

# Superior Court of the District of Columbia

## CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

District of Columbia Case Number: \_\_\_\_\_

vs

Date: February 2, 2018

Sanford Capital, LLC , et al.

One of the defendants is being sued in their official capacity.

Name: <i>(Please Print)</i> Jimmy Rock		Relationship to Lawsuit
Firm Name: D.C. Office of the Attorney General Housing and Community Justice		<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: (202) 741- 0770	Six digit Unified Bar No.: 493521	<input type="checkbox"/> Self (Pro Se)
		<input type="checkbox"/> Other: _____

TYPE OF CASE:  Non-Jury  6 Person Jury  12 Person Jury  
Demand: \$ Civil penalties and restitution Other: \_\_\_\_\_

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: 2016 CA 000162 B Judge: Mott Calendar #: \_\_\_\_\_

Case No.: 2016 CA 007767 B Judge: Mott Calendar#: \_\_\_\_\_

NATURE OF SUIT: *(Check One Box Only)*

<b>A. CONTRACTS</b>		<b>COLLECTION CASES</b>	
<input type="checkbox"/> 01 Breach of Contract	<input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent	<input type="checkbox"/> 16 Under \$25,000 Consent Denied	
<input type="checkbox"/> 02 Breach of Warranty	<input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent	<input type="checkbox"/> 18 OVER \$25,000 Consent Denied	
<input type="checkbox"/> 06 Negotiable Instrument	<input type="checkbox"/> 27 Insurance/Subrogation	<input type="checkbox"/> 26 Insurance/Subrogation	
<input type="checkbox"/> 07 Personal Property	Over \$25,000 Pltf. Grants Consent	Over \$25,000 Consent Denied	
<input type="checkbox"/> 13 Employment Discrimination	<input type="checkbox"/> 07 Insurance/Subrogation	<input type="checkbox"/> 34 Insurance/Subrogation	
<input type="checkbox"/> 15 Special Education Fees	Under \$25,000 Pltf. Grants Consent	Under \$25,000 Consent Denied	
	<input type="checkbox"/> 28 Motion to Confirm Arbitration Award (Collection Cases Only)		
<b>B. PROPERTY TORTS</b>			
<input type="checkbox"/> 01 Automobile	<input type="checkbox"/> 03 Destruction of Private Property	<input type="checkbox"/> 05 Trespass	
<input type="checkbox"/> 02 Conversion	<input type="checkbox"/> 04 Property Damage		
<input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a)			
<b>C. PERSONAL TORTS</b>			
<input type="checkbox"/> 01 Abuse of Process	<input type="checkbox"/> 10 Invasion of Privacy	<input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice)	
<input type="checkbox"/> 02 Alienation of Affection	<input type="checkbox"/> 11 Libel and Slander	<input type="checkbox"/> 18 Wrongful Death (Not Malpractice)	
<input type="checkbox"/> 03 Assault and Battery	<input type="checkbox"/> 12 Malicious Interference	<input type="checkbox"/> 19 Wrongful Eviction	
<input type="checkbox"/> 04 Automobile- Personal Injury	<input type="checkbox"/> 13 Malicious Prosecution	<input type="checkbox"/> 20 Friendly Suit	
<input checked="" type="checkbox"/> 05 Deceit (Misrepresentation)	<input type="checkbox"/> 14 Malpractice Legal	<input type="checkbox"/> 21 Asbestos	
<input type="checkbox"/> 06 False Accusation	<input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death)	<input type="checkbox"/> 22 Toxic/Mass Torts	
<input type="checkbox"/> 07 False Arrest	<input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice)	<input type="checkbox"/> 23 Tobacco	
<input type="checkbox"/> 08 Fraud		<input type="checkbox"/> 24 Lead Paint	

SEE REVERSE SIDE AND CHECK HERE IF USED

# Information Sheet, Continued

## C. OTHERS

- |   |   |
|---|---|
| <input type="checkbox"/> 01 Accounting                                  | <input type="checkbox"/> 17 Merit Personnel Act (OEA)<br>(D.C. Code Title 1, Chapter 6)                     |
| <input type="checkbox"/> 02 Att. Before Judgment                        | <input type="checkbox"/> 18 Product Liability   |
| <input type="checkbox"/> 05 Ejectment                                   | <input type="checkbox"/> 24 Application to Confirm, Modify,<br>Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 09 Special Writ/Warrants<br>(DC Code § 11-941) | <input type="checkbox"/> 29 Merit Personnel Act (OHR)   |
| <input type="checkbox"/> 10 Traffic Adjudication                        | <input type="checkbox"/> 31 Housing Code Regulations  |
| <input type="checkbox"/> 11 Writ of Replevin                            | <input type="checkbox"/> 32 Qui Tam   |
| <input type="checkbox"/> 12 Enforce Mechanics Lien                      | <input type="checkbox"/> 33 Whistleblower   |
| <input type="checkbox"/> 16 Declaratory Judgment                        |   |

## II.

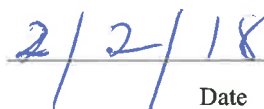
- |  |   |  |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name                                 | <input type="checkbox"/> 15 Libel of Information                                    | <input type="checkbox"/> 21 Petition for Subpoena<br>[Rule 28-I (b)]                     |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic                      | <input type="checkbox"/> 19 Enter Administrative Order as<br>Judgment [ D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien                                       |
| <input type="checkbox"/> 08 Foreign Judgment/International                 | 2-1802.03 (h) or 32-151 9 (a)]  | <input type="checkbox"/> 23 Rule 27(a)(1)  |
| <input type="checkbox"/> 13 Correction of Birth Certificate                | <input type="checkbox"/> 20 Master Meter (D.C. Code §                               | <input type="checkbox"/> 24 Petition for Structured Settlement<br>(Perpetuate Testimony) |
| <input type="checkbox"/> 14 Correction of Marriage<br>Certificate          | 42-3301, et seq.)   | <input type="checkbox"/> 25 Petition for Liquidation                                     |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle)  |   |  |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) |   |  |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other)    |   |  |

## D. REAL PROPERTY

- |  |  |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate                | <input type="checkbox"/> 08 Quiet Title                                  |
| <input type="checkbox"/> 12 Specific Performance                     | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted           |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain)            | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied            |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale       | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) |  |



Attorney's Signature



Date



**Superior Court of the District of Columbia  
CIVIL DIVISION  
Civil Actions Branch  
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001  
Telephone: (202) 879-1133 Website: www.dccourts.gov**

**DISTRICT OF COLUMBIA**

Plaintiff \_\_\_\_\_

vs.

Case Number \_\_\_\_\_

**SANFORD CAPITAL, LLC**

Defendant \_\_\_\_\_

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

**JIMMY ROCK**

*Clerk of the Court*

Name of Plaintiff's Attorney \_\_\_\_\_

**441 4TH STREET, NW, 6TH FLOOR**

By \_\_\_\_\_

Address \_\_\_\_\_

Deputy Clerk

**WASHINGTON, D.C. 20001**

**(202) 741 - 0770**

Date \_\_\_\_\_

Telephone \_\_\_\_\_

如需翻译,请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Đề có một bài dịch, hãy gọi (202) 879-4828

번역을 원하시면, (202) 879-4828로 전화주세요. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation  
Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
**500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001**  
**Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

DISTRICT OF COLUMBIA

\_\_\_\_\_ Demandante  
 contra \_\_\_\_\_

Número de Caso: \_\_\_\_\_

SANFORD CAPITAL, LLC  
 \_\_\_\_\_ Demandado

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

JIMMY ROCK  
 \_\_\_\_\_  
 Nombre del abogado del Demandante

*SECRETARIO DEL TRIBUNAL*

441 4TH STREET, NW, 6TH FLOOR  
 \_\_\_\_\_  
 Dirección  
 WASHINGTON, D.C. 20001  
 \_\_\_\_\_

Por: \_\_\_\_\_  
 Subsecretario

(202) 741- 0770  
 \_\_\_\_\_  
 Teléfono

Fecha \_\_\_\_\_

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**IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.**

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés  
 See reverse side for English original



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**DISTRICT OF COLUMBIA**

Plaintiff \_\_\_\_\_

vs.

Case Number \_\_\_\_\_

**4951 G STREET, LLC**

Defendant \_\_\_\_\_

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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**JIMMY ROCK**

*Clerk of the Court*

Name of Plaintiff's Attorney \_\_\_\_\_

**441 4TH STREET, NW, 6TH FLOOR**

By \_\_\_\_\_

Address \_\_\_\_\_

Deputy Clerk

**WASHINGTON, D.C. 20001**

**(202) 741 - 0770**

Date \_\_\_\_\_

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DISTRICT OF COLUMBIA

\_\_\_\_\_ Demandante  
 contra

4951 G STREET, LLC

\_\_\_\_\_ Demandado

Número de Caso: \_\_\_\_\_

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le require entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le require presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

JIMMY ROCK  
 Nombre del abogado del Demandante

*SECRETARIO DEL TRIBUNAL*

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 Subsecretario

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Fecha \_\_\_\_\_

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 本法院于本月初(202)879-4828 与 本法院于本月初      የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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CIVIL DIVISION  
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Telephone: (202) 879-1133 Website: www.dccourts.gov**

**DISTRICT OF COLUMBIA**

Plaintiff \_\_\_\_\_

vs.

Case Number \_\_\_\_\_

**OAKMONT MANAGEMENT GROUP LLC**

Defendant \_\_\_\_\_

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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**JIMMY ROCK**

*Clerk of the Court*

Name of Plaintiff's Attorney

**441 4TH STREET, NW, 6TH FLOOR**

By \_\_\_\_\_

Address

**WASHINGTON, D.C. 20001**

Deputy Clerk

**(202) 741 - 0770**

Date \_\_\_\_\_

Telephone

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**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
**500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001**  
**Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

DISTRICT OF COLUMBIA

\_\_\_\_\_ Demandante  
 contra

Número de Caso: \_\_\_\_\_

OAKMONT MANAGEMENT GROUP LLC  
 \_\_\_\_\_ Demandado

**CITATORIO**

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JIMMY ROCK  
 \_\_\_\_\_  
 Nombre del abogado del Demandante

*SECRETARIO DEL TRIBUNAL*

441 4TH STREET, NW, 6TH FLOOR  
 \_\_\_\_\_  
 Dirección  
 WASHINGTON, D.C. 20001

Por: \_\_\_\_\_  
 Subsecretario

(202) 741- 0770  
 \_\_\_\_\_  
 Teléfono

Fecha \_\_\_\_\_

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 如需翻译, 请打电话 (202) 879-4828      如需翻译, 请打电话 (202) 879-4828      የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.**

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

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**Superior Court of the District of Columbia**  
**CIVIL DIVISION**  
**Civil Actions Branch**  
**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
**Telephone: (202) 879-1133 Website: www.dccourts.gov**

**DISTRICT OF COLUMBIA**

Plaintiff \_\_\_\_\_

vs.

Case Number \_\_\_\_\_

**AUBREY CARTER NOWELL**

Defendant \_\_\_\_\_

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

**JIMMY ROCK**

*Clerk of the Court*

Name of Plaintiff's Attorney \_\_\_\_\_

**441 4TH STREET, NW, 6TH FLOOR**

By \_\_\_\_\_

Address

Deputy Clerk

**WASHINGTON, D.C. 20001**

**(202) 741 - 0770**

Date \_\_\_\_\_

Telephone

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번역을 원하시면, (202) 879-4828 로 전화주세요. የአግርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
**Sección de Acciones Civiles**  
**500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001**  
**Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

DISTRICT OF COLUMBIA

\_\_\_\_\_ Demandante  
 contra

Número de Caso: \_\_\_\_\_

AUBREY CARTER NOWELL  
 Demandado

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le require entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintidós (22) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le require presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

JIMMY ROCK  
 Nombre del abogado del Demandante  
 \_\_\_\_\_  
441 4TH STREET, NW, 6TH FLOOR  
 Dirección  
 \_\_\_\_\_  
WASHINGTON, D.C. 20001  
 \_\_\_\_\_  
(202) 741- 0770  
 Teléfono

*SECRETARIO DEL TRIBUNAL*  
 \_\_\_\_\_  
 Por: \_\_\_\_\_  
 Subsecretario  
 \_\_\_\_\_  
 Fecha \_\_\_\_\_

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 電話翻譯請打(202)879-4828      電話翻譯請打(202)879-4828      የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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Vea al dorso el original en inglés  
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IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

DISTRICT OF COLUMBIA  
441 4th Street NW  
Washington, D.C. 20001

*Plaintiff,*

v.

SANFORD CAPITAL, LLC  
7605 Arlington Road, Suite 250  
Bethesda, MD 20814

**Serve on: Registered Agent**  
C T CORPORATION SYSTEM  
1015 15th Street, NW, Suite 1000  
Washington, DC 20005

and

4951 G STREET, LLC  
7605 Arlington Rd, Suite 250  
Bethesda, MD 20814

**Serve on: Registered Agent**  
C T CORPORATION SYSTEM  
1015 15th Street, NW, Suite 1000  
Washington, DC 20005

and

OAKMONT MANAGEMENT GROUP LLC  
7605 Arlington Road, Suite 250  
Bethesda, MD 20814

**Serve on: Registered Agent**  
C T CORPORATION SYSTEM  
1015 15th Street, NW, Suite 1000  
Washington, DC 20005

and

Civ. No. 2018-CA-\_\_\_\_\_

**COMPLAINT FOR VIOLATIONS OF  
THE CONSUMER PROTECTION  
PROCEDURES ACT**

**JURY TRIAL DEMANDED**

AUBREY CARTER NOWELL  
*In his individual capacity*  
6807 Bradley Boulevard  
Bethesda, MD 20817

*Defendants.*

---

**COMPLAINT FOR VIOLATIONS OF THE  
CONSUMER PROTECTION PROCEDURES ACT**

The District of Columbia (the “District”) files suit against Defendants Sanford Capital, LLC, 4951 G Street, LLC, Oakmont Management Group LLC, and Aubrey Carter Nowell (collectively, “Defendants”) pursuant to the Consumer Protection Procedures Act (“CPPA”), D.C. Code § 28-3901, *et seq.* In support of its Complaint, the District alleges as follows:

---

**INTRODUCTION**

1. The District brings this action to address Defendants’ misrepresentations that they would provide safe and habitable housing to the tenants who rented residential units at 4951-57 G Street, SE (“the Property” or “G Street Apartments”), a 48-unit apartment complex spread across four separate buildings and located in Washington, D.C. From October 2009 until December 2017, Defendants were the owners, managers and operators of the G Street Apartments. During that time, Defendants engaged in a pattern of pervasive neglect of the Property, causing tenants to endure vermin and bug infestations, inadequate sanitary, heating and life safety facilities, and other hazardous conditions, including unchecked criminal activity resulting from a lack of basic security measures. Defendants’ pattern of neglect continued even after the District filed a public nuisance action concerning the property in 2014, and Defendants committed in a Consent Agreement resolving that case to address outstanding Housing Code and security issues at the Property.

2. When Defendants offered and leased apartments to their tenants, Defendants represented that they would maintain the Property in a habitable condition, including in compliance with the District's laws and regulations (including the District's Housing Code). *See, e.g.*, D.C. Reg. 14-3011; *Javins v. First Nat'l Realty Corp.*, 428 F.2d 1071 (D.C. 1970). Defendants' failure to do so, while continuing to charge and collect rent from tenants, is an unlawful trade practice in violation of the CPPA. To remedy Defendants' violations of the CPPA, provide tenants restitution for past harm, and deter such violations in the future, the District seeks to disgorge rental payments, assess penalties, and collect reasonable fees and costs.

### **JURISDICTION**

3. The Court has subject matter jurisdiction over this matter pursuant to D.C. Code § 11-921 and § 28-3909.

4. The Court has personal jurisdiction over Defendants pursuant to D.C. Code § 13-423.

### **PARTIES**

5. Plaintiff, the District, a municipal corporation that is authorized to sue and be sued, is the local government for the territory constituting the seat of the government for the United States of America. The District brings this action, through its Office of Attorney General, pursuant to the CPPA, D.C. Code § 28-3909, which authorizes the Attorney General to bring court actions to enforce the District's consumer protection laws, including the CPPA.

6. Defendant Sanford Capital, LLC ("Sanford") is a limited liability company organized under the laws of the state of Delaware and maintains a principal place of business at 7605 Arlington Road, Suite 250, Bethesda, MD 20814. Sanford is a residential real estate development and investment firm that owns and operates rental properties in Washington, D.C.,

including the Property. The Property is held in the name of a separate single-asset LLC under the ownership and control of Sanford and Defendant Aubrey Carter Nowell.

7. Defendant 4951 G Street, LLC (“4951 G Street”) is a single-asset, limited liability company operating in the District of Columbia organized under the laws of the state of Delaware. 4951 G Street maintains a principal place of business at 7605 Arlington Road, Suite 250, Bethesda, MD 20814. 4951 G Street held legal title to the Property from October 2009 to December 2017.

8. Defendant Oakmont Management Group LLC (“Oakmont”) is a limited liability company organized under the laws of the state of Delaware and maintains a principal place of business at 7605 Arlington Road, Suite 250, Bethesda, MD 20814. Oakmont was responsible for the property management of 4951 G Street and acts as the agent for 4951 G Street and Sanford.

9. Defendant Nowell is a principal, founder, and managing partner of Sanford, the managing member of 4951 G Street, and the managing member of Oakmont. At all times relevant to this Complaint, Nowell formulated, directed, controlled, had the authority to control, participated in, or with knowledge approved of the acts or practices of Sanford, 4951 G Street, and Oakmont, including the acts and practices set forth in this Complaint. Nowell resides in Bethesda, Maryland.

### **FACTS**

10. After acquiring the Property in October 2009, Defendants leased units in the Property to tenants through lease agreements. By operation of law, through their lease agreements, and in their direct dealings with tenants, Defendants represented to tenants, both expressly and implicitly, that they would maintain the Property in a safe and habitable condition, in compliance with the District’s Housing Code and other laws and regulations, when in fact they

did not. Defendants then collected rent from tenants without disclosing that Defendants were either unable or unwilling to maintain the Property in a safe and habitable condition, consistent with their obligations under their leases, as well as the District's housing laws and regulations.

### **Persistent Health, Safety, and Security Issues at the Property**

11. During the time that Defendants owned, managed and controlled the Property, and at all times relevant to this Complaint, the Property has been in a serious state of disrepair, and suffered from a multitude of health, safety and security issues, including those described below in paragraphs 12 through 19.

12. During periods relevant to this Complaint, the Property was infested with mice, rats, cockroaches and bedbugs. These infestations presented an unsanitary hazard for the tenants of the Property. Tenants repeatedly and consistently complained to Defendants regarding the rodent and bug infestations. Despite the tenants' repeated complaints, Defendants failed to take measures to abate the infestations.

13. During periods relevant to this Complaint, the Property lacked heat during the winter. This lack of heat forced tenants to rely on other, unsafe sources of heat, including relying on kitchen gas ovens or space heaters, which were provided by Defendants in lieu of fixing the Property's heating system. Tenants repeatedly and consistently complained to Defendants about the lack of heating, and Defendants failed to take measures to properly abate this issue.

14. During periods relevant to this Complaint, the Property's plumbing routinely leaked, causing flooding in tenants' units that threatened the tenants' health and safety. Tenants routinely notified Defendants of these leaks. However, Defendants either failed to address these leaks, or only addressed them in a superficial way that failed to fix the source of the leak. This

flooding itself presented a hazard and also created additional health hazards such as mold growth.

15. During periods relevant to this Complaint, tenants observed mold growth in their apartments. Tenants reported the growth of mold in their units to Defendants, who either failed to respond to the complaints, or made superficial repairs that failed to address the underlying problem.

16. During periods relevant to this Complaint, the Property's plumbing was frequently blocked, which resulted in the hazardous backup of raw sewage into tenants' units.

17. During periods relevant to this Complaint, Defendants repeatedly failed to clean common areas at the Property, resulting in trash buildup and foul odors.

18. During periods relevant to this Complaint, tenants faced the threat of drug and firearm-related activity at the Property. Loiterers often congregated on the Property in large groups and squatters routinely resided in the Property's vacant units. The vacant units, hallways and parking lots in the property were often used for illicit activities, including the sale and use of drugs and the discharge of firearms. These activities threatened the safety of the Defendants tenants. Despite being made aware of these safety issues, Defendants failed to implement proper security measures. In fact, during periods relevant to this Complaint, the Property has lacked basic safety measures, such as locks on the Property's front door, adequate lighting in and around the Property, working locks on vacant units, security cameras, and security guards.

19. During periods relevant to this Complaint, the Property suffered from unabated fire hazards, including lack of working fire exit signs, lack of fire extinguishers and lack of working smoke detectors.



20. Defendants' failure to maintain the Property free from health, safety and security issues caused the District, in 2014, to bring a public nuisance suit against Defendants 4951 G Street and Sanford to abate drug and firearm nuisance activities at the Property. To resolve that case, Defendants 4951 G Street, Sanford and Nowell entered into a Consent Agreement in which they agreed to correct outstanding Housing Code violations and security issues at the Property. Despite this Consent Agreement, Defendants continued to fail to maintain the property free from health, safety and security issues.

21. Many of the Property's tenants are low-income individuals. These tenants made the difficult decision to continue residing at the Property despite the hazardous and dangerous conditions caused by Defendants' failure to maintain the property because these tenants lacked the means to move to another location.

#### **Inspections of Property Confirm Health, Safety, and Security Issues**

22. Defendants' failure to maintain the Property free from health, safety and security issues has been repeatedly confirmed by inspections of the Property, which uncovered widespread instances of Housing Code and other violations, many of which Defendants have failed to abate.

23. For instance, in December 2016 and January 2017, the Department of Consumer and Regulatory Affairs ("DCRA") inspected the Property and cited Defendants for a total of 151 Housing Code violations, 94 of which constituted a serious threat to tenants' health, safety, or security. In February, March and April 2017, DCRA returned for re-inspections of the Property, and while DCRA was only able to re-inspect 71 out of the 94 serious violations that were issued in January of 2017, it found that Defendants had failed to abate at least 57 of these 94 serious violations.

24. On June 23, 2017, the D.C. Fire and EMS Department (“FEMS”) similarly conducted a building-wide inspection of the Property. From this inspection, FEMS cited Defendant 4951 G Street for 36 fire code violations, including exposed wiring, exit light needed securing, removing storage on the third floor, the absence of alarm and smoke detectors, unsecured vacant units, defective emergency lights, and unsecured hand rails. On July 22, 2017 FEMS re-inspected the Property. None of the violations were abated; rather FEMS found that the cited conditions had worsened.

**COUNT I**  
**(Violations of the Consumer Protection Procedures Act)**

25. The District incorporates by reference paragraphs 1 through 24.

26. The CPPA prohibits unlawful trade practices in connection with the offer, lease and supplying of consumer goods and services. D.C. Code § 28-3901(a)(6). The District may enforce the CPPA in the arena of landlord-tenant relations, such as presented in this case. D.C. Code § 28-3909(d).

27. The tenants in the Property are consumers, as defined by the CPPA, because they rented their units in the Property for personal, household, or family purposes. D.C. Code §28-3901(a)(2).

28. Defendants, in the ordinary course of business, offer to lease or supply consumer goods and services and, therefore, are merchants under the CPPA. D.C. Code § 28-3901(a)(3).

29. The CPPA authorizes the Attorney General to file suit against any person the Attorney General has reason to believe “is using or intends to use any method, act, or practice [that is an unlawful trade practice] in violation of ... D.C. Code § 38-3904.” D.C. Code § 28-3909(a).

30. It is an unlawful trade practice under the CPPA for any person to do any of the following:

- (a) represent that goods or services have a source, sponsorship, approval, certification, or connection that they do not have [...];
- (d) represent that goods or services are of particular standard, quality, grade, style, or model, if in fact they are of another;
- (e) misrepresent as to a material fact which has a tendency to mislead; [or]
- (f) fail to state a material fact if such failure tends to mislead [...]

D.C. Code § 28-3904.

31. Here, Defendants committed unlawful trade practices under the CPPA when they:

- i. expressly and implicitly represented to tenants that the units Defendants offered to lease and did lease are or would be maintained in a safe and habitable condition, and in compliance with the District's laws and regulations (including the District's Housing Code) when, in fact, the units were not safe and habitable and were not maintained in a manner consistent with the District's laws and regulations;
- ii. expressly and implicitly represented to tenants that the Property was safe and habitable and would be maintained in compliance the District's laws and regulations (including the District's Housing Code) when, in fact, the Property was not safe and habitable and Defendants have not maintained the Property in a manner consistent with the District's laws and regulations;
- iii. expressly and implicitly represented to tenants that Defendants have abated or will abate all Housing Code violations and any other material defects that pose a serious threat to the health, safety, or security of the tenants when, in fact, Defendants would not do so; and
- iv. collected rent from tenants while failing to inform them that Defendants would continuously and systematically fail to maintain the Property in a safe and habitable condition and in a manner consistent with the District's laws and regulations.

32. Defendants' misrepresentations and material omissions of fact both had the capacity and tendency to mislead consumers in violation of §28-3904(a), (d), (e) and (f) of the CPPA.

33. Defendants' failure to abate the numerous Housing Code violations found within their buildings constitute violations of 16 DCMR § 3305. Such violations are also unlawful trade practices that violate § 28-3904(dd) of the CPPA.

34. Tenants have suffered substantial injury because of Defendants' violations of the CPPA. In particular, tenants have paid full rent to Defendants while being forced to live in apartments with unsafe or insanitary conditions and substantial Housing Code violations. Defendants continued to collect full rent payments from tenants despite Defendants' misrepresentations and material omissions about the conditions of the Property and their willingness to maintain it. As such, Defendants have been unjustly enriched by their unlawful acts or practices.

35. Where the Attorney General establishes a violation of the CPPA, the Court may, among other relief, award "restitution for property lost or damages suffered," issue a temporary or permanent injunction against the use of the unlawful "method act or practice," and award "a civil penalty of not more than \$1,000 for each violation, the costs of the action, and reasonable attorney's fees." D.C. Code § 28-3909(a)-(b).

36. Defendant Nowell is personally liable under the CPPA because he possessed and/or exercised the authority to control the policies and trade practices of Defendants 4951 G Street, Oakmont, and Sanford; was responsible for creating and implementing the alleged deceptive policies and trade practices of Defendants 4951 G Street, Oakmont, and Sanford that are described in this Complaint; participated in the alleged deceptive trade practices that are described in this Complaint; directed or supervised those employees of Defendants 4951 G Street, Oakmont, and Sanford who participated in the alleged deceptive trade practices that are described in this Complaint; and knew or should have known of the deceptive trade practices that

are described in this Complaint and had the power to stop them, but rather than stopping them, promoted their use.

**RELIEF REQUESTED**

Wherefore, Plaintiff, the District of Columbia, respectfully requests that the Court:

(a) Award restitution, pursuant to D.C. Code § 28-3909(a), against Defendants, jointly and severally, sufficient to disgorge the rent amounts that were unlawfully charged to tenants while the Property was uninhabitable, unsafe, in violation of the District's Housing Code, or otherwise deceptively offered and leased;

(b) Award damages pursuant to D.C. Code § 28-3909(a) against Defendants to compensate the Defendants' tenants who were harmed while residing in the Property because it was not safe or habitable due to the Defendants' neglect;

(c) Award civil penalties against Defendants, jointly and severally, in an amount up to \$1,000 per violation of the CPPA pursuant to D.C. Code § 28-3909(b);

(d) Award the District all allowable costs;

(e) Award reasonable attorney's fees pursuant to D.C. Code § 28-3909(b); and

(f) Provide any other relief deemed appropriate by the Court.

**JURY DEMAND**

The District of Columbia hereby demands a trial by jury by the maximum number of jurors permitted by law.

Dated: February 2, 2018

Respectfully Submitted,

KARL A. RACINE  
Attorney General for the District of Columbia

ROBYN BENDER  
Deputy Attorney General  
Public Advocacy Division

PHILIP ZIPERMAN  
Director, Office of Consumer Protection



---

JIMMY R. ROCK  
Assistant Deputy Attorney General  
Public Advocacy Division  
Bar. No. 493521



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JANE LEWIS\*  
Chief, Housing and Community Justice Section



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MONIQUE COBB\*  
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*Attorneys for the District of Columbia*

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\* Practicing in the District of Columbia pursuant to Ct. App. R. 49(c)(4) and under the supervision of a member of the D.C. Bar.