

# Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

## INFORMATION SHEET

District of Columbia \_\_\_\_\_

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

vs

Date: December 19, 2018

220 Hamilton Street LLC, et al.

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

Name: <i>(Please Print)</i> <b>Monique Cobb</b>	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____
Firm Name: <b>Office of the Attorney General</b>	
Telephone No.: _____ Six digit Unified Bar No.: _____ <b>(202) 727-3012</b> <b>1531175</b>	

TYPE OF CASE:  Non-Jury  6 Person Jury  12 Person Jury  
 Demand: \$ \_\_\_\_\_ Other: \_\_\_\_\_

**PENDING CASE(S) RELATED TO THE ACTION BEING FILED**

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar #: \_\_\_\_\_

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar#: \_\_\_\_\_

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

**A. CONTRACTS**

**COLLECTION CASES**

- |   |  |   |
|---|--|---|
| <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<br>Award (Collection Cases Only) |   |

**B. PROPERTY TORTS**

- |   |   |                                      |
|---|---|--------------------------------------|
| <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) |   |                                      |

**C. PERSONAL TORTS**

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> 01 Abuse of Process                      | <input type="checkbox"/> 10 Invasion of Privacy                              | <input type="checkbox"/> 17 Personal Injury- (Not Automobile,<br>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,<br>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"/> 09 Special Writ/Warrants<br>(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,<br>Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication                        | <input type="checkbox"/> 29 Merit Personnel Act (OHR)   |
| <input type="checkbox"/> 11 Writ of Replevin                            | <input type="checkbox"/> 31 Housing Code Regulations  |
| <input type="checkbox"/> 12 Enforce Mechanics Lien                      | <input type="checkbox"/> 32 Qui Tam   |
| <input checked="" type="checkbox"/> 16 Declaratory Judgment             | <input type="checkbox"/> 33 Whistleblower   |

## II.

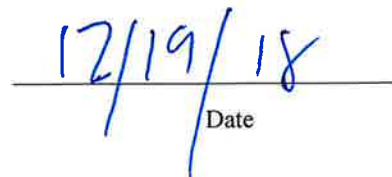
- |  |   |  |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name                                 | <input type="checkbox"/> 15 Libel of Information                                    | <input type="checkbox"/> 21 Petition for Subpoena<br>[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic                      | <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)<br>(Perpetuate Testimony)  |
| <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       |
| <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 \_\_\_\_\_

220 Hamilton 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.

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.

Monique Cobb

*Clerk of the Court*

Name of Plaintiff's Attorney

441 4th Street, NW, Suite 630 South

By \_\_\_\_\_

Address

Deputy Clerk

Washington, D.C. 20001

202-727-3012

Date \_\_\_\_\_

Telephone

如需翻译,请打电话 (202) 879-4828

Veillez 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

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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: \_\_\_\_\_

220 Hamilton Street, 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 veintinueve (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.

Monique Cobb

*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante

441 4th Street, NW, Suite 630 South

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

Dirección

Subsecretario

Washington, D.C. 20001

202-727-3012

Fecha \_\_\_\_\_

Teléfono

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반려물구함사민(202) 879-4828

국선외국사민

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 pedir ayuda al respecto.

Vea al dorso el original en inglés  
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**CIVIL DIVISION**  
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**500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001**  
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District of Columbia

\_\_\_\_\_  
 Plaintiff

vs.

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

Vision Realty Management, 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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Monique Cobb

*Clerk of the Court*

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

441 4th Street, NW, Suite 630 South

By \_\_\_\_\_

Deputy Clerk

Address

Washington, D.C. 20001

202-727-3012

Date \_\_\_\_\_

Telephone

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District of Columbia  
 \_\_\_\_\_  
 Demandante

contra

Vision Realty Management, LLC  
 \_\_\_\_\_  
 Demandado

Número de Caso: \_\_\_\_\_

**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 veintinueve (29) 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.

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Monique Cobb  
 \_\_\_\_\_  
 Nombre del abogado del Demandante

*SECRETARIO DEL TRIBUNAL*

441 4th Street, NW, Suite 630 South  
 \_\_\_\_\_  
 Dirección  
 Washington, DC 20001  
 \_\_\_\_\_

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

202-727-3012  
 \_\_\_\_\_  
 Teléfono

Fecha \_\_\_\_\_

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**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 \_\_\_\_\_

Vivienne Awasum

Defendant

**SUMMONS**

To the above named Defendant:

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Monique Cobb

*Clerk of the Court*

Name of Plaintiff's Attorney

441 4th Street, NW, Suite 630 South

By \_\_\_\_\_

Address

Washington, D.C. 20001

Deputy Clerk

202-727-3012

Date \_\_\_\_\_

Telephone

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**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA**  
**DIVISIÓN CIVIL**  
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District of Columbia

Demandante

contra

Número de Caso: \_\_\_\_\_

Vivienne Awasum

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.

Monique Cobb

*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante

441 4th Street, NW, Suite 630 South

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

Dirección

Washington, D.C. 20001

202-727-3012

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 pedirayuda al respecto.

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



**IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

DISTRICT OF COLUMBIA )  
441 4th Street, N.W. )  
Washington, D.C. 20001 )

*Plaintiff,* )

Civ. No.:

v. )

220 HAMILTON STREET, LLC )  
9104 Tuckahoe Lane )  
Adelphi, M.D. 20783 )

**SERVE ON Registered Agent:** )  
VIVIENNE AWASUM )  
901 R Street, Apt. #1, N.W. )  
Washington, D.C. 20010 )

and )

VISION REALTY MANAGEMENT, LLC )  
6325 Woodside Court, Ste. 230 )  
Columbia, M.D. 21046 )

**SERVE ON Registered Agent:** )  
DELORES TUCKER )  
3128 Sherman Avenue, Apt. #10, N.W. )  
Washington, D.C. 20010 )

and )

VIVIENNE AWASUM )  
***In her individual capacity*** )  
901 R Street, Apt. #1, N.W. )  
Washington, D.C. 20010 )

*Defendants.* )

---

**COMPLAINT FOR APPOINTMENT OF RECEIVER AND VIOLATIONS OF THE  
CONSUMER PROTECTION PROCEDURES ACT<sup>1</sup>**

The District of Columbia (the “District”) files suit against 220 Hamilton Street, LLC, Vision Realty Management, LLC and Vivienne Awasum (collectively, “Defendants”), seeking the appointment of a receiver at 220 Hamilton Street N.W., Washington, D.C., 20011 in accordance with the Tenant Receivership Act, D.C. Code §§ 42-3651.01 - .08 (“TRA”) and restitution, civil penalties, costs, attorney’s fees and injunctive relief pursuant to the Consumer Procedures Act (“CPA”), D.C. Code §§ 28-3901, 3913. The District alleges as follows:

**PRELIMINARY STATEMENT**

1. The TRA authorizes this Court to appoint a receiver for a rental housing accommodation in the District of Columbia in order to safeguard the health, safety, and security of tenants from a landlord’s continued failure to abate hazardous housing conditions. Receivership is statutorily authorized where either (a) the landlord has failed to timely abate violations of title 14, chapters 1-16 of the District of Columbia Municipal Regulations (the “housing code”) issued by the Department of Consumer and Regulatory Affairs (“DCRA”) or (b) the landlord has demonstrated a “pattern of neglect” toward the property that poses a serious threat to the health, safety, or security of the tenants for a period of thirty consecutive days.

2. The District files this action to appoint a receiver in order to compel prompt abatement of the hazardous housing conditions that Defendants have failed to abate. This action also seeks to provide injunctive relief, disgorge rental payments, assess penalties, and collect reasonable

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<sup>1</sup> While the Tenant Receivership Act references a “Petition” for Appointment of Receiver and refers to relevant parties as “Petitioner” and “Respondents,” the District has captioned that matter as a “Complaint,” given its other claims, and will refer to parties throughout this matter as “Plaintiff” or “Defendants.”

attorney's fees and costs for violations of the CPPA, and to deter such violations from occurring in the future.

3. 220 Hamilton Street N.W., Washington, D.C. 20011 (the "Property") is a semi-detached apartment building with a total of thirty-four units located within the District of Columbia that Defendants own, operate, manage, and otherwise control. When Defendants offered and leased the rental housing accommodation to their tenants, they represented that they would maintain the Property in accordance with District of Columbia laws and regulations, including the District's housing code. Defendants have failed to do so.

**Background on 220 Hamilton Street N.W.**

4. The building located at 220 Hamilton Street N.W. was built in 1936. Rufus Stancil and the Stancil family ("the Stancils"), the previous owners, bought the Property in 1996. (*See* Ex. 1, Stancil Deed).

5. In 2008, the Office of the Attorney General ("OAG") sued the Stancils for their failure to maintain the Property, for subjecting tenants of limited means to "dangerous and serious housing code violations," and for "intentionally allow[ing] their buildings to deteriorate to inhumane conditions in a cynical effort to force their tenants to vacate...220 Hamilton Street N.W." (*See* Ex. 2, OAG/Stancil Complaint). The Stancils agreed to address the housing code violations cited by DCRA, but no major effort was taken to address the broader and more serious conditions at the Property.

6. In March 2017, the Property was acquired by 220 Hamilton Street, LLC in a bankruptcy proceeding in the United States Bankruptcy Court for the District of Columbia. (*See* Ex. 3, 220 Hamilton, LLC Deed). The Defendants knew about the substantial housing code violations at the

time of the transfer, but similar to the previous owners, no major effort was taken to address the serious conditions of the Property.

7. On November 27, 2017, shortly after acquisition of the Property through bankruptcy sale, 220 Hamilton Street, LLC and Vivienne Awasum (“Owners”), applied for a substantial rehabilitation petition requesting to increase the rent of the tenants, who have lived in deteriorating conditions for years. (See Ex. 4, Excerpt of 220 Hamilton Street Substantial Rehabilitation Petition). In the petition, the Owners admitted that the building is in desperate need of “structural repairs,” noting how leaks have severely damaged the floor boards. (*Id.* at 5). The Owners also admitted that the units at the Property have extensive water damage, that the existing electrical system is marginally providing adequate power and that there are “frequent power outages.” (*Id.* at 6). The Owners also admitted that the units are poorly heated with the current boiler system. (*Id.*).

8. Attached as an exhibit to the Owners’ November 2017 Substantial Rehabilitation Petition was a Conditions Assessment of the Property performed in June of 2016 by Soto Architecture and Urban Design, PLLC. (See Ex. 5, 220 Hamilton Conditions Assessment). The Conditions Assessment provided that there was a need of immediate repairs that threatened the life and safety of the tenants at the Property, noting the “need of immediate structural, plumbing and life safety repairs.” (*Id.* at 4) Specifically, the assessment noted that: a) there was extensive structural damage to the wood framed floors caused by water damage; b) that the structural joist in the crawlspace were temporary and that more extensive structural reinforcement was needed; c) that the cast iron sewage pipes in the building were broken and leaked sewage and rainwater into the building, furthering the structural issues at the Property; and d) the building did not meet life safety codes, as there was only one exterior exit and that the windows “were very hard to operate” and cannot

be considered emergency exits. (*Id.*) Upon information and belief, the Owners were put on notice of the June 2016 Condition Assessment when they purchased the Property in March 2017.

9. There have been no major updates at the Property for years and for all time periods relevant to the Complaint. The tenants have also lived in these conditions for years and for all time periods relevant to the Complaint.

10. Moreover, the Owners have admitted that they have no immediate plans to make the repairs at the Property. On August 27, 2018, the Owners submitted a plan to the District admitting that they were awaiting the judgment of the 2017 Substantial Rehabilitation Petition before making many of the repairs at the Property (that include many of the life, health and safety repairs at issue in this case). (*See Ex. 6, Violations Corrections Timelines*).

#### **2018 Housing Code Violations**

11. On July 27, 2018, the Department of Consumer and Regulatory Affairs (“DCRA”) conducted a property-wide inspection. At this property inspection, DCRA cited one hundred and seventy-three (173) violations; ninety-eight (98) of which were severe violations that threaten the health, life and safety of the tenants at the Property. DCRA conducted housing code re-inspections for the one (1) day and thirty (30) day violations and of the one hundred and seventy-three (173) DCRA violations cited on July 27, 2018, one hundred and thirteen (113) were not abated. (*See Ex. 7, DCRA Inspection Reports*).

12. The record shows that the Property suffers from a demonstrated history of neglect and indifference resulting from the actions or omissions of Defendants. Defendants’ pattern of neglect at the Property stretches for nearly two years. The tenants at the Property have suffered from numerous dangerous conditions, including:

- 1) a severe rodent and insect infestation;

- 2) leaks from the roof, plumbing, windows and unknown sources;
- 3) heating and insulation issues; and
- 4) structural issues and inadequate flooring.

13. All of these conditions “pose a serious threat” to the health, safety, and security of the tenants. Tenants repeatedly informed Defendants of these hazardous conditions, yet Defendants allowed the conditions to remain unabated for almost two years—well above the thirty-day threshold necessary to warrant receivership under D.C. Code § 42-3651.02(b). The refusal of the Defendants to address health, safety, and security issues in a timely manner is particularly troubling in light of the fact that all of the tenants have modest financial means, and therefore lack ready alternatives to the unsafe and unhealthy rental accommodations inflicted upon them by the Defendants.

14. Finally, Defendants’ misrepresentations that they would maintain the Property in accordance with the District’s housing code constitute violations of the CPPA.

15. Accordingly, the District of Columbia petitions the Court for entry of the following relief:

- (a) Appoint a receiver pursuant to D.C. Code § 42-3651.05-.06 to develop and supervise a viable repair plan for the satisfactory rehabilitation of the Property;
- (b) Order that the Defendant contribute funds in excess of the rents collected from the rental housing accommodation, pursuant to D.C. Code § 42-3651.05(f), as necessary for the rehabilitation of the Property;
- (c) Award restitution and other authorized relief for Defendants’ violations of the CPPA; and
- (d) Provide any other relief deemed appropriate by the Court.

## **I. Jurisdiction**

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

17. The Court has personal jurisdiction pursuant to D.C. Code § 13-423.

## **II. Parties**

18. Plaintiff the District of Columbia, a municipal corporation empowered to sue and be sued, is the local government for the territory constituting the permanent seat of the government of the United States. The District is represented by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and conduct of all legal business of the District and all suits initiated by and against the District and is responsible for upholding the public interest. D.C. Code § 1-301.81(a)(1). The Attorney General is also specifically authorized to enforce both the TRA and the CPPA. *See* D.C. Code § 42-3651.03; *see also* D.C. Code § 28-3909.

19. Defendant 220 Hamilton Street, LLC is a limited liability company organized under the laws of the District of Columbia and maintains a principal place of business at 901 R Street, N.W., Apt. #1, Washington, D.C. 20010. 220 Hamilton Street, LLC is the owner of the apartment building located at 220 Hamilton Street, N.W. 220 Hamilton Street, LLC is engaged in the business of real estate, renting and leasing. Vivienne Awasum is the governor of 220 Hamilton Street, LLC. (*See* Ex. 8, 220 Hamilton LLC Corporate Filings).

20. Defendant Vision Realty Management, LLC (“Vision Realty”) is a limited liability company organized under the laws of Maryland and maintains a principal place of business at 6325 Woodside Court, Suite #230, Columbia, MD 21046. Defendant Vision Realty is the property management company for 220 Hamilton Street N.W. Vision Realty is engaged in the business of real estate management. Mario Lloyd is the governor of Vision Realty. (*See* Ex. 9, Vision Realty LLC Corporate Filings).

21. Defendant Vivienne Awasum is the principal and entity governor of 220 Hamilton Street, LLC. At all times material to this Complaint, Ms. Awasum directed, controlled, had the authority to control, participated in, or with knowledge approved of the acts or practices of 220 Hamilton Street, LLC, including the acts and practices set forth in this Complaint.

### **III. Facts**

22. The Property is a two-story apartment building consisting of thirty-four units, located in Northwest Washington, D.C. (*See* Ex. 3, 220 Hamilton, LLC Deed).

23. Defendant 220 Hamilton Street, LLC acquired legal title to the Property on March 22, 2017 through bankruptcy sale. (Case No. 16-00589 and Adv. Proc. No. 17-10001). *Id.*

24. At all relevant times, Defendant Vision Realty has acted as an agent for 220 Hamilton Street, LLC and has been responsible for managing Property.

25. After acquiring the Property, 220 Hamilton Street, LLC assumed responsibility for all of the existing tenants' residential leases.

26. After acquiring the Property, 220 Hamilton Street, LLC leased units in the Property to tenants through lease agreements. Each lease agreement contained an implied warranty of habitability that obligated Defendants to maintain the Property in a livable condition and in compliance with District law. Defendants then collected, and continue to collect, rent from tenants/consumers without disclosing that Defendants would not maintain the Property consistent with the District's laws and regulations—including the District's housing code and mold laws—or in a habitable condition. (*See* Ex. 10, 220 Hamilton Lease).

27. On July 27, 2018, the Department of Consumer and Regulatory Affairs (“DCRA”) conducted initial housing code inspections. During this inspection, DCRA identified one hundred and seventy-three (173) housing code violations. (*See* Ex. 7, DCRA Inspection Reports).



28. DCRA conducted housing code re-inspections for one (1) day and thirty (30) day violations. *Id.* Out of the one hundred and seventy-three (173) housing code violations, one hundred and thirteen (113) were not abated. *Id.*

29. Virtually all of the tenants are low income individuals and most tenants are monolingual Spanish speakers. Many of these tenants have made the difficult decision to continue residing at the Property despite hazardous and dangerous conditions simply because they lack the means to seek other residential options.

30. Defendants' inaction in abating serious and hazardous housing conditions demonstrates a pattern of neglect.

**A. The Defendants Have Demonstrated a Pattern of Neglect for the Property that Threatens the Health, Safety, and Security of the Tenants**

31. Five current tenants of the Property have submitted affidavits in connection with this Complaint that detail the representative conditions that tenants at the Property have experienced:

- **Maurice Tesheira**, a tenant who has resided at 220 Hamilton Street N.W. for 27 years. (Ex. 11, Aff. of Maurice Tesheira ("Tesheira Aff.") ¶¶ 2-3.);
- **Lesley Andrews**, a tenant who has resided at 220 Hamilton Street N.W. for 11 years. (Ex. 12, Aff. of Lesley Andrews ("Andrews Aff.") ¶¶ 2-3.);
- **Andre Owens**, a tenant who has resided at 220 Hamilton Street N.W. for 5 years. (Ex. 13, Aff. of Andre Owens ("Owens Aff.") ¶¶ 2-3.);
- **Janet Martinez**, a tenant who has resided at 220 Hamilton Street N.W. for 5 years. (Ex. 14, Aff. of Janet Martinez ("Martinez Aff.") ¶¶ 2-3.);
- **Yesica Licona**, a tenant who has resided at 220 Hamilton Street N.W. for 3 years. (Ex. 15, Aff. of Yesica Licona ("Licona Aff.") ¶¶ 2-3.).

32. All five of these representative tenants have resided at the Property during the entire time that 220 Hamilton Street, LLC has owned the building and all five continue to reside at the Property.

33. All five of these representative tenants have suffered from a multitude of unsafe and unsanitary conditions. Defendants failed to remedy the conditions even after being notified of the conditions by the tenants. The ongoing failure to abate these hazardous conditions for months and years at a time demonstrates a pattern of neglect at the Property. Evidence of this pattern of neglect includes:

**i. Pest Infestation**

34. The Property suffers from a severe mice and rat infestation. (*See* Tesheira Aff. ¶ 6; Andrews Aff. ¶ 7; Licona Aff. ¶ 6; Owens Aff. ¶ 7).

35. Tenants have repeatedly raised their concerns about the mice infestation to Defendants. (*E.g.*, “I have a mice, bed bugs, roaches, and rodent infestation. I have had rats and mice in my kitchen since I moved in. I called Vision twice and they did nothing. I went out and bought rat traps... I still have mice, bed bugs, roaches and rodent issues in my apartment.” Owens Aff. ¶ 7; “I have had rodents, roaches and bedbugs ever since I moved in. I have complained a lot of times about the infestation in my apartment. Vision never responded to my complaints, and I had to take it upon myself to get products to exterminate. I still have mice and bed bugs, but I have gotten tired of reporting this problem because I know that Vision will not do anything about it.” Licona Aff. ¶ 6; *see also* Tesheira Aff. ¶ 6, Andrews Aff. ¶ 7, Martinez Aff. ¶ 4). Despite the many complaints from tenants, the rodent, cockroach and bedbug infestation is an ongoing issue at the Property.

**ii. Water Damage**

36. On July 27, 2018, DCRA cited 25 instances of water damage, dampness in the walls, and water infiltration at the Property. *See* Ex. 7, DCRA Inspection Reports.

37. Moreover, tenants on multiple occasions suffered and currently suffer from leaks, ceiling collapses, and damp walls at the Property despite reporting these issues to Defendants. (*E.g.*, “I have had a leak in my apartment since the end of 2016. The leak was in the wall in my bathroom – my walls were turning brown. I called Vision, the property manager, and told them of this leak more than 15 times and neither management nor the owner fixed this issue for 8 months...I had to live like this for a very long time before anything was done.” Andrews Aff. ¶ 6; “Since September 2017, my kitchen ceiling had a crack and water came into my apartment through the ceiling when it rained. I called [Vision], the property manager, and told them of this crack and the water coming into my apartment in September, October and November of 2017; however, it was never fixed. In April 2018, my kitchen ceiling collapsed.” Owens Aff. ¶ 5; “I had a ceiling leak in my bedroom for 5 months in 2017. The ceiling was sinking in and the dry wall was breaking apart as if the ceiling was going to cave in. I complained to Vision about this leak 5 times and nothing was done. The ceiling leak messed up a lot of my clothing and I would have to get towels to dry up the water. After 5 months, Vision repaired the leak by patching up the roof but many of my belongings were damaged because it took so long for the repairs to be made.” Andrews Aff. ¶ 10).

### **iii. Heat and Insulation Issues**

38. There is a lack of heat in the winter at the Property. (*E.g.*, “Last winter, I had problems with the heat in my unit. The heat would go in and out some nights and it was very cold. It is also very unsafe when the heat goes out because often times the tenants would start to turn on their stove or use space heaters to heat up their apartments.” Tesheira Aff. ¶ 9; “From November 2017 through January 2018, many residents here had no heat. My apartment was so cold. I complained about this issue at least 10 times to Vision. DCRA eventually brought heaters to the tenants because the owner did nothing about the lack of heat in our building. It was so cold that I caught pneumonia

and I was in the hospital for two weeks.” Andrews Aff. ¶ 9; “Last winter the heat went out in my unit multiple times and it was very cold... The heat still goes out every year since I have lived here.” Owens Aff. ¶ 10; “For five years, I have had issues with my heaters in the living room and the kitchen. I do not have heat in the whole apartment because the heat radiators in my apartment do not work... On cold days, I have to use a space heater and move it from room to room for warmth.” Martinez Aff. ¶ 5).

39. The Property is also not properly insulated. Windows at the Property are in a state of disrepair. (*E.g.*, “My windows were falling out of my apartment and the glass was falling out of the window panes. When it rained, a lot of water came through my window. When it was cold, a lot of cold air came into my bedroom and living room. I complained to Vision about this issue more than 7 times and I personally told Vivienne about this issue... there is still some cold air coming in.” Andrews Aff. ¶ 8; “I have issues with the windows in my apartment... The windows in my apartment are in terrible condition and I can feel outside air coming in. The windows have not been replaced or changed since I moved into the apartment in 1993.” Tesheira Aff. ¶ 10; “[W]hen I try to open the kitchen window, it falls down. I reported this issue to Vision two times and they never came to fix it.” Licona Aff. ¶ 10).

#### **iv. Structural Issues and Inadequate Flooring**

40. There are number of structural issues at the Property. On July 27, 2018, DCRA identified nine (9) serious structural issues at the Property, citing weak floors and foundation problems, among others. *See Ex. 7, DCRA Inspection Reports.*

41. Tenants at the Property have also noticed structural issues. (*E.g.*, “I also have issues with the floor in my apartment. The floor in the kitchen is sinking. I have complained about my floor three times and nothing has been done to repair my flooring issue. I also noticed that the wood

floor in the bedroom shows signs of termites eating away at it.” Tesheira Aff. ¶ 8; “The kitchen floor has holes.” Licona Aff. ¶ 10; “The tiles of the floor [in the common areas] are deteriorating and there is a small hole in the floor where you can see into the basement.” Owens Aff. ¶ 12; “The common areas are in bad condition. The floors are uneven and are missing pieces. The tiles on the floor are deteriorating.” Andrews Aff. ¶ 12).

42. Walls and ceilings in the apartments are crumbling. (*E.g.*, “The ceiling in the bedroom is cracked and has remained cracked for over a year.... I called Vision about the cracked ceiling ... about two different times. Although Vision came to repair it, they did a poor job because this is still a problem today.” Licona Aff. ¶ 9).

**v. Other Evidence of Pattern of Neglect**

43. The common areas are in bad condition. (*E.g.*, “The floors are uneven and are missing pieces. The tiles on the floor are deteriorating. There are also water leaks in the hallways and on the stairwells.” Andrews Aff. ¶ 12; “For about three or four years, every time it rains, there is a water leakage in the stairwell leading to the second floor. I have reported this issue many times; however, they never made the repair. This is still a problem today, and this is a very dangerous condition because people can slip and fall. My daughter slipped and fell the other day.” Martinez Aff. ¶ 8; *see also* Tesheira ¶ 11, Owens Aff. ¶ 12).

44. Tenants at the Property have issues with bathroom facilities and are often unable to access hot water or control the water temperature and pressure. (*E.g.*, “For three or four years, my toilet has been broken and leaking... This is still a problem today, and I have spent my own money on repairs.” Martinez Aff. ¶ 6; “I have a mold and mildew in my bathroom. The water coming from the bathroom is always brown. My toilet lost pressure and stopped flushing. I now have to fill up the toilet tank with water from the bathtub to flush the toilet. I told Vivienne this during the DCRA

re-inspection of my bathroom issues on September 19, 2018, but nothing has been done to repair any of these issues.” Owens Aff. ¶ 9; “I have an issue with mold in my apartment for at least two years. The mold grows up the walls in my bathroom. I have called Vision and complained, but they have done nothing. Eventually, I took it upon myself to put bleach on the mold in my apartment. My family now assists me with cleaning the mold in my unit.” Andrews Aff. ¶ 11; *see also* Licona Aff. ¶ 8).

45. Tenants have faulty kitchen hardware and appliances and despite putting the management and owners on notice, tenants have not received repairs. (*E.g.*, “The conditions of the kitchen cabinets have deteriorated over the years. The kitchen cabinets recently fell off the wall. I first reported this issue with my kitchen cabinets over two years ago; however, this issue is still not fixed. I moved the broken kitchen cabinet into the hallway and it [is] still there to this day.” Martinez Aff. ¶ 7).

#### **IV. Statutory Basis for Appointment of Receiver**

46. In accordance with D.C. Code § 42-3651.03, the Attorney General for the District of Columbia may petition the Court to appoint a receiver over a rental housing accommodation that “has been operated in a manner that demonstrates a pattern of neglect for the property for a period of 30 consecutive days and such neglect poses a serious threat to the health, safety, or security of the tenants.” D.C. Code § 42-3651.02(b). The term “pattern of neglect” includes “all evidence that the owner, agent, lessor, or manager of the rental housing accommodation has maintained the premises in a serious state of disrepair, including vermin or rat infestation, filth or contamination, inadequate ventilation, illumination, sanitary, heating or life safety facilities, inoperative fire suppression or warning equipment, or any other condition that constitutes a hazard to its occupants or to the public.” *Id.*

47. The D.C. Council enacted the TRA to protect tenants in instances where the landlord has refused to remedy dangerous housing code violations despite efforts to compel abatement. As stated in the 2008 Committee Report recommending adoption of the legislation:

Despite the existence of an inspections process, many tenants live in unsanitary and unsafe conditions without meaningful options for remedies. For example, reports abound of tenants living in housing units infested with vermin, of children developing respiratory problems caused by mold buildup, and of people living without heat or hot water. In the absence of a meaningful remedy, tenants are typically confronted with an impossible choice: persist in unsanitary conditions or move out. Disturbingly, some landlords have used the lack of a meaningful remedy to their advantage. Recently, the *Washington Post* reported that some landlords purposely neglected apartment units in the hope that conditions would become so intolerable that tenants would be forced to vacate their homes. Once vacant, buildings command higher prices on the market because they are more easily converted to lucrative condominiums.

Comm. Rep., B17-0729, Abatement of Nuisance Properties and Tenant Am. Act of 2008, at 2 (Nov. 14, 2008) [the “Committee Report”].

48. Once appointed, the receiver shall, among other things: “Take charge of the operation and management of the rental housing accommodation and assume all rights to possess and use the building, fixtures, furnishings, records, and other related property and goods that the owner or property manager would have if the receiver had not been appointed . . . .” D.C. Code § 42-3651.06(1).

**COUNT I**  
**(Petition for Appointment of a Receiver under the Tenant Receivership Act)**

49. The District incorporates by reference Paragraphs 1 through 48.

50. Defendants have operated the Property in a manner that demonstrates a pattern of neglect under D.C. Code § 42-3651.02(b). The Property has suffered from infestations of bedbugs,

roaches, and mice as well as serious health concerns from mold growth and contamination at the Property.

51. The aforementioned and ongoing pattern of neglect has been established well beyond the statutory period of 30 consecutive days. Defendants have ignored repeated complaints from tenants. Defendants have shown themselves unwilling and incapable of undertaking the necessary actions to abate and eliminate these unhealthy and unsafe conditions.

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

52. The District incorporates by reference paragraphs 1 through 51.

53. The District of Columbia Consumer Protection Procedures Act (“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). Defendants offer and leasing of apartments to tenants are consumer goods and services under the CPPA.

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

55. 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).

56. 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 § 28-3904.” D.C. Code § 28-3909(a).

57. Under the CPPA, it is an unlawful trade practice for any person to:

(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.

58. Here, Defendants committed unlawful trade practices under the CPPA when, among other acts, they:

- a. implicitly represented to tenants/consumers, through the offering and entering into of leases and other acts, that the Property was habitable and would be maintained in compliance the District's laws and regulations (including the District's housing code) when, in fact, the Property is not habitable and Defendants have not maintained the Property in a manner consistent with the District's laws and regulations;
- b. implicitly represented to tenants/consumers 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/consumers when, in fact, Defendants have not done so; and
- c. collected rent from tenants/consumers while failing to inform them that Defendants would continuously and systematically fail to maintain the Property in a habitable condition.

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

60. 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.

61. Tenants/consumers in the District have suffered substantial injury because of Defendants' violations of the CPPA. In particular, tenants/consumers have paid, and continue to pay, full rent to Defendants while being forced to live in apartments with substantial housing code violations.

Defendants have continued to collect full rent payments from tenants/consumers despite Defendants' false representations, 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.

62. Where the Attorney General establishes a violation of the CPPA, the Court may, among other relief, award restitution, issue a temporary or permanent injunction against the use of the unlawful method act or practice, and award a civil penalty for each violation, the costs of the action, and reasonable attorney's fees. D.C. Code § 28-3909(a)-(b).

63. Defendants 220 Hamilton Street, LLC, Vision Realty Management, LLC and Vivienne Awasum, in her personal capacity, are liable under the CPPA even for acts that may have been performed in the name of corporations they controlled because they possessed and/or exercised the authority to control the policies and trade practices of the corporate Defendants; they were responsible for creating and implementing the alleged unfair and deceptive policies and trade practices that are described herein; participated in the alleged unfair and deceptive trade practices that are described herein; directed or supervised employees who participated in the alleged unfair and deceptive trade practices that are described herein; and knew or should have known of the unfair and deceptive trade practices that are described herein 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) Appoint a receiver who has demonstrated to the Court the expertise to develop and supervise a viable financial and repair plan for the satisfactory rehabilitation of the multi-unit rental housing accommodations which are the subject of this lawsuit;

(b) Order that the Defendants, jointly and severally, contribute funds in excess of the rents collected from the rental housing accommodation for the purposes of abating housing code violations and assuring that any conditions that are a serious threat to the health, safety, or security of the occupants or public are corrected pursuant to D.C. Code § 42-3651.05(f);

(c) Award restitution to disgorge the rent amounts that Defendants charged tenants while the Property was in violation of the District's housing code or otherwise uninhabitable under D.C. Code § 28-3909(a);

(d) Award civil penalties in an amount to be proven at trial and as authorized per violation of the CPPA pursuant to D.C. Code § 28-3909(b);

(e) Enter injunctive relief as appropriate against Defendants for the use of any unlawful trade practices pursuant to D.C. Code § 28-3909(a);

(f) Award all allowable costs;

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

(h) Provide any other relief deemed appropriate by the Court, including a permanent injunction against any further violation of the CPPA.

Dated: December 19, 2018

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*Attorneys for the District of Columbia*

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

DISTRICT OF COLUMBIA	)	
	)	
<i>Plaintiff,</i>	)	Civ. No.:
	)	
v.	)	
	)	
220 Hamilton Street, LLC, <i>et al.</i>	)	
	)	
<u><i>Defendants.</i></u>	)	

**ORDER TO SHOW CAUSE**

Upon consideration and review of the Petition for Appointment of Receiver, it is by this Court this \_\_\_\_ day of \_\_\_\_\_, 2019, pursuant to D.C. Code § 42-3651.04, hereby

**ORDERED** that Respondents 220 Hamilton Street, LLC, Vision Realty Management, LLC and Vivienne Awasum shall appear on the \_\_\_\_ day of \_\_\_\_\_, 2019 at \_\_\_\_\_ to show cause why a receiver should not be appointed. Respondents are advised that the court will consider, in addition to the grounds for receivership set forth in D.C. Code § 42-3651.02, a plan submitted by the Respondents to abate the conditions alleged in the petition.

**SO ORDERED** this \_\_\_\_ of \_\_\_\_\_, 2019.

\_\_\_\_\_  
**Judge**