

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

DISTRICT OF COLUMBIA,
a municipal corporation,
441 4th Street, N.W.
Washington, D.C. 20001,

Plaintiff,

v.

CURTIS INVESTMENT GROUP, INC.,
5620 Linda Lane
Camp Springs, MD 20748,

Serve on:
GYFB INC.
Registered Agent
1200 New Hampshire Ave., N.W.
Suite 555
Washington, D.C. 20036,

Defendant.

Case No.:

COMPLAINT

Plaintiff the District of Columbia (the District) brings this action against defendant Curtis Investment Group, Inc. (Curtis) for violation of the District of Columbia Human Rights Act (DCHRA), D.C. Code §§ 2-1401.01, *et seq.* In support of its claim, the District states as follows.

INTRODUCTION

1. The availability of affordable housing in Washington, D.C. has fallen dramatically in recent years. Affordable housing stock has trended downward while rents have trended upward—a pressure that is particularly felt by low-income

tenants. Approximately 10,500 low-income District households depend on federally funded Housing Choice Vouchers, which are also called Section 8 vouchers. Section 8 and other housing-assistance programs provide needed rental assistance to these low-income households and are a crucial lifeline in alleviating rent burdens, allowing participants to allocate spending toward non-housing necessities, such as food, transportation, and clothing. This assistance is critical in a city where many households are severely rent burdened and spend more than half of their monthly income on rent.

2. The District brings this action against Curtis, which owns, operates, and leases residential real estate in the District, because Curtis discriminates against housing-assistance participants in leasing rental housing. Specifically, Curtis has posted advertisements for a residential property in the District that expressly states that it does not accept vouchers and other housing assistance.

3. Curtis's conduct violates District of Columbia law. The DCHRA prohibits discrimination based on source of income in the rental housing market. D.C. Code § 2-1402.21(a)(1). The DCHRA also prohibits posting advertisements that suggest that a housing provider discriminates based on source of income. D.C. Code § 2-1402.21(a)(5). By posting discriminatory advertisements, Curtis has violated the DCHRA.

4. The District seeks injunctive relief and civil penalties to prevent and deter Curtis from engaging in these and similar discriminatory practices.

JURISDICTION

5. The Attorney General for the District of Columbia brings this action on behalf of the District of Columbia to uphold the public interest and enforce District law, here, the DCHRA. *See District of Columbia v. ExxonMobil Oil Corp.*, 172 A.3d 412 (D.C. 2017); D.C. Code § 1-301.81(a)(1) (“The Attorney General for the District of Columbia ... shall be responsible for upholding the public interest.”).

6. This Court has subject matter jurisdiction over the claims and allegations in the Complaint. *See* D.C. Code § 11-921(a).

7. This Court has personal jurisdiction over Curtis because Curtis owns property and transacts business in the District. *See* D.C. Code § 13-423.

PARTIES

8. Plaintiff 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 conducts all of the District’s legal business and is responsible for upholding the public interest. D.C. Code § 1-301.81(a)(1).

9. Curtis is a full-service real estate company with its principal place of business in Maryland. Curtis owns and leases commercial and residential real estate in the District. Curtis’s residential real estate in the District includes:

- a. Camelot Square, 3200 E Street, S.E., Washington, D.C., 20020;
- b. Cornerstone, 1800 Minnesota Avenue, S.E., Washington, D.C., 20020;

- c. Wheeler Park, 3211-3221 Wheeler Road, S.E., Washington, D.C., 20032; and
- d. Oxon Run Manor, 207 Mississippi Ave., S.E., Washington, D.C. 20032.

FACTS

Housing Assistance And The Rental Housing Market In The District

10. The United States Department of Housing and Urban Development administers the federally funded Housing Choice Voucher Program. The Housing Choice Voucher Program is a successor to the Section 8 Rental Voucher Program, but Housing Choice Vouchers are still commonly referred to as Section 8 vouchers. For ease of reference, this Complaint adopts the Section 8 terminology to refer to the present-day Housing Choice Voucher Program.

11. In the District, Section 8 vouchers are locally administered by the District of Columbia Housing Authority (DCHA). Section 8 vouchers are tenant-based subsidies that enable participants to rent housing on the private market at market rates. Section 8 voucher participants pay a portion of the rent based on a percentage of the participant's household income, and the remainder of the rent is paid by DCHA directly to the landlord.

12. The District of Columbia Department of Human Services (DHS) administers rapid-rehousing programs that provide rental assistance to help individuals and families exit homelessness and transition to permanent housing. After participants sign a lease, DHS pays rent directly to the landlord for up to 12-months, and participants reimburse the District for a portion of the rent. Participants

also receive case management and connections to support services over the course of the lease.

13. One goal of housing-assistance programs is to provide low-income households opportunities to access rental housing outside areas of concentrated poverty. Housing assistance provides a household with options and choices that are not available in traditional public housing.

14. For low-income residents in the District, housing assistance is a critical lifeline; by subsidizing rent, households can reallocate spending on other necessities, such as food, transportation, and clothing.

15. Housing assistance is particularly crucial in a city like the District, where high rents consume a disproportionate share of household expenditure. According to one study, in 2016, over 22% of the District's tenant households spent more than half of their monthly income on rent. Tom Acitelli, *Rent-burdened in D.C.: About half city's tenant households confront crushing costs*, Curbed (Sept. 26, 2018), <https://dc.curbed.com/2018/9/26/17902304/rent-burdened-dc>. In addition, in recent years, the District's rental housing market has become more expensive while the availability of affordable rental housing has plunged. Housing assistance is thus increasingly important to low-income District tenants seeking to obtain affordable housing and navigate the city's high cost of living.

16. Many tenants in the District—including those who receive housing assistance—rely on online postings to find housing. Postings and advertisements that

discourage tenants who receive housing assistance from applying for housing create barriers in the rental market.

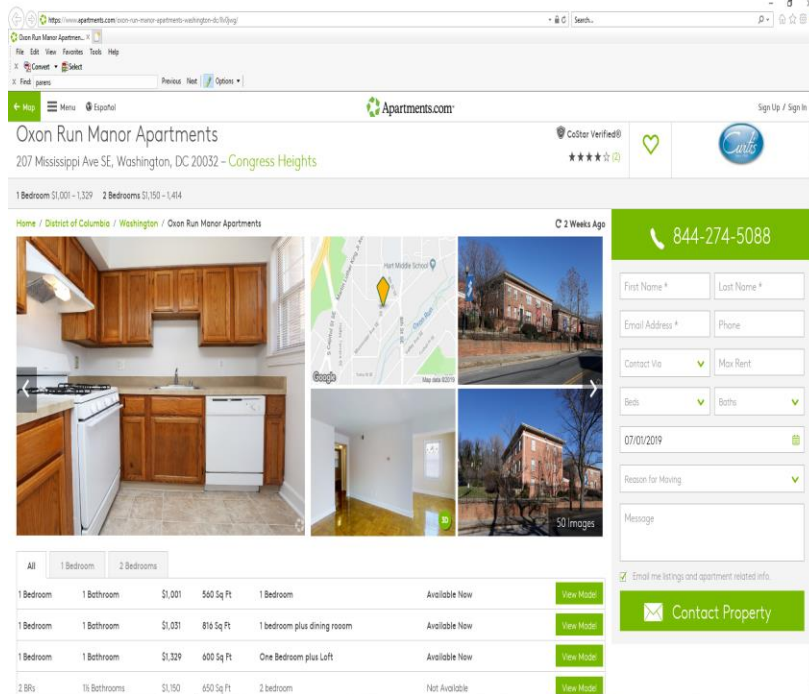
Curtis's Discriminatory Rental Policies And Practices

17. Curtis offers multiple residential buildings for lease in the District, including Oxon Run Manor and Cornerstone.

18. Curtis advertises Oxon Run Manor on its website, <http://curtisinvestments.com/property/oxon-run-manor/>. A screenshot of this website is attached as Exhibit 1.

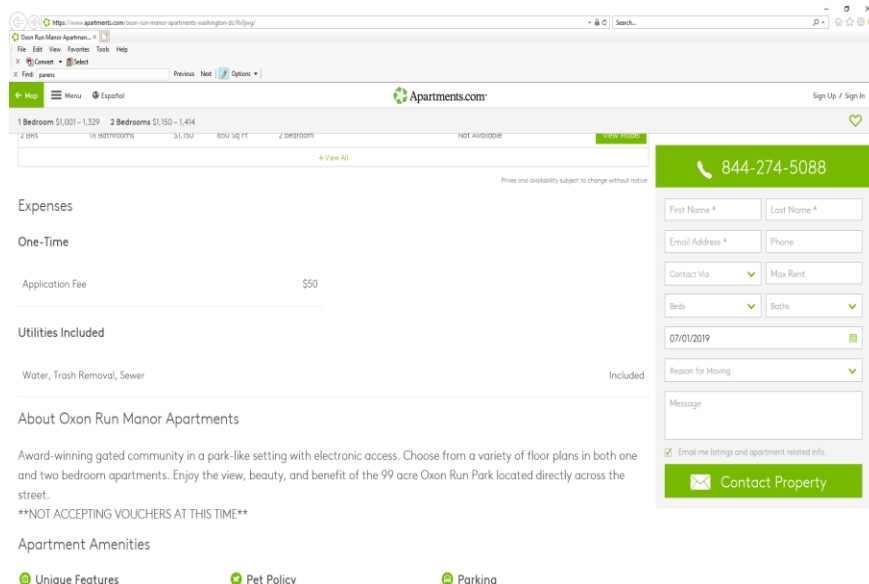
19. That website in turn links to a third-party listing service, Apartments.com.

20. Curtis's Apartments.com listing of Oxon Run Manor includes several pictures of the property, and, as of June 21, 2019, listed several available units in the building, as reflected in this screenshot and in Exhibit 2:



21. The listing also includes a description of the property under a section titled “About Oxon Run Manor Apartments.”

22. The description of the property expressly states that Curtis is “**NOT ACCEPTING VOUCHERS AT THIS TIME**” as reflected in this screenshot:

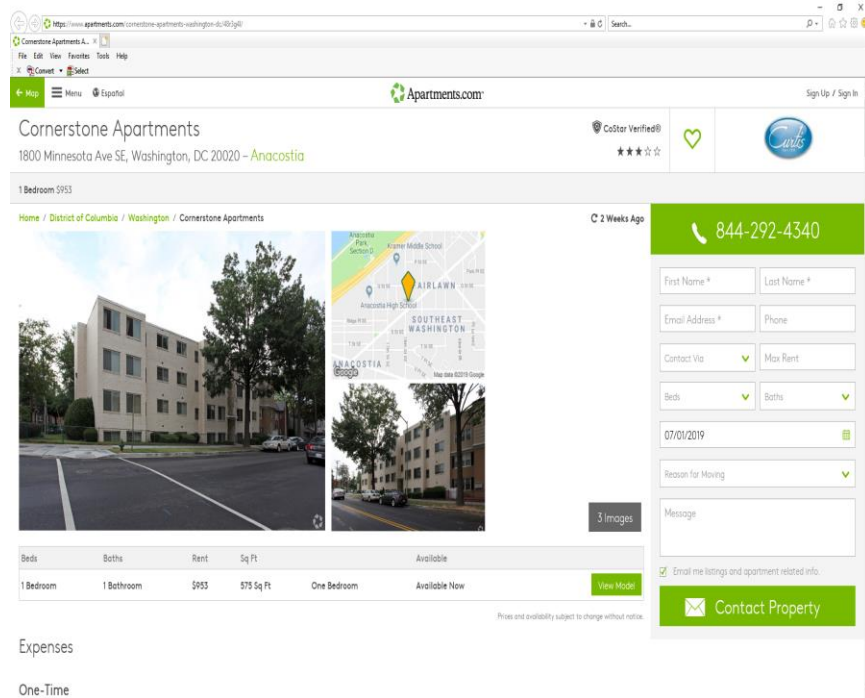


23. This advertisement has been posted since at least June 2019.

24. Curtis also advertises Cornerstone on its website, <http://curtisinvestments.com/property/cornerstone/>. A screenshot of this website is attached as Exhibit 3.

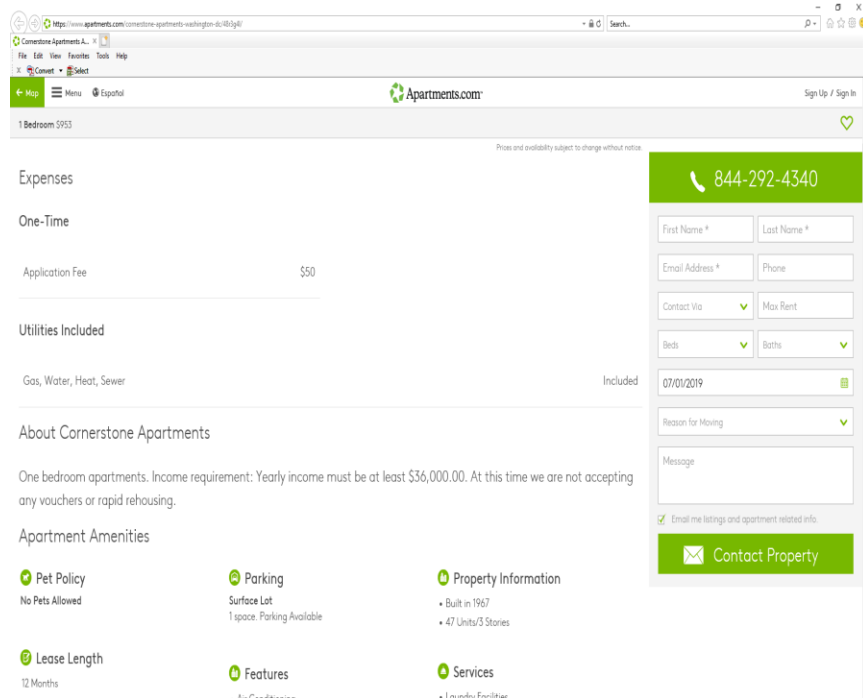
25. That website in turn links to Apartments.com.

26. Curtis’s Apartments.com listing of Cornerstone includes pictures of the property, and, as of June 21, 2019, listed one available unit in the building, as reflected in this screenshot and in Exhibit 4:



27. The listing also includes a description of the property under a section titled “About Cornerstone Apartments.”

28. The description of the property states that “[a]t this time we are not accepting any vouchers or rapid rehousing” as reflected in this screenshot:



29. This advertisement has been posted since at least June 2019.

30. A representative for Curtis verbally confirmed that Curtis does not accept payments from the rapid re-housing program at its properties.

COUNT I VIOLATION OF THE DCHRA

31. Paragraphs 1-30 are incorporated here.

32. Under the DCHRA, it is an “unlawful discriminatory practice” to “refuse or fail to initiate or conduct any transaction in real property” where such refusal or failure is “wholly or partially ... based on the actual or perceived ... source of income ... of any individual.” D.C Code § 2-1402.21(a)-(a)(1).

33. The DCHRA also defines an “unlawful discriminatory practice” to include the making of “any ... statement, or advertisement, with respect to a transaction, or proposed transaction, in real property ... [that] unlawfully indicates

or attempts unlawfully to indicate any preference, limitation, or discrimination based on ... source of income ... of any individual.” D.C. Code § 2-1402.21(a)(5).

34. The DCHRA defines “source of income” broadly to include income from all sources and expressly includes funding from Section 8 vouchers. D.C. Code § 2-1402.01(29) (defining “source of income” to include “federal payments”); *see also* D.C. Code § 2-1402.21(e) (“The monetary assistance provided to an owner of a housing accommodation under section 8 of the United States Housing Act of 1937 ... shall be considered a source of income under this section.”).

35. Curtis’s statement in its advertisement that it would not rent to housing-voucher participants is a discriminatory advertisement based on the actual or perceived source of income of individuals in violation of D.C. Code § 2-1402.21(a)(5).

36. Curtis’s policy of refusing to accept certain forms of housing assistance as rent payments is a discriminatory refusal to initiate or conduct a transaction in real property based on the actual or perceived source of income of individuals in violation of D.C. Code § 2-1402.21(a)(1).

PRAYER FOR RELIEF

WHEREFORE, the District requests this Court enter judgment in its favor and grant relief against Curtis as follows:

- (a) Injunctive and declaratory relief;
- (b) Civil penalties; and
- (c) Such other and further relief as this Court deems appropriate.

JURY DEMAND

The District of Columbia demands a jury trial.

Dated: June 24, 2019.

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

TONI MICHELLE JACKSON
Deputy Attorney General
Public Interest Division

/s/ Michael A. Tilghman II
MICHAEL A. TILGHMAN II [988441]
VIKRAM SWARUUP*
Assistant Attorneys General
441 Fourth Street, N.W., Suite 600 South
Washington, D.C. 20001
Tel: (202) 727-6247
Fax: (202) 741-8776
Email: michael.tilghman@dc.gov

Counsel for Plaintiff District of Columbia

* Practicing in the District of Columbia under the direct supervision of Toni Michelle Jackson, a member of the D.C. Bar. *See* D.C. Court of Appeals Rule 49(c).

EXHIBIT 1



Oxon Run Manor

📍 207 Mississippi Ave., SE, Washington, D.C., 20032

This award-winning, gated community offers an inviting, warm environment for you and your family. From its beautiful one- and two-bedroom garden style apartments to the peaceful, natural setting of the 99-acre park directly across the street, Oxon Run Manor is the perfect place to call home.

At Oxon Run Manor, you have a choice from eight floor plans that include all the amenities you would expect from an award-winning community, including sun-filled dining rooms, bright new kitchens and beautiful hardwood floors.

You will have plenty to keep you and your family busy with the Oxon Run Swim Club, tennis courts, ball park, recreation center, tot lot, walking and biking trails and picnic areas. Enjoy easy access to shopping, entertainment, restaurants and convenient access to commuter thoroughfares such as I-495 and I-295.

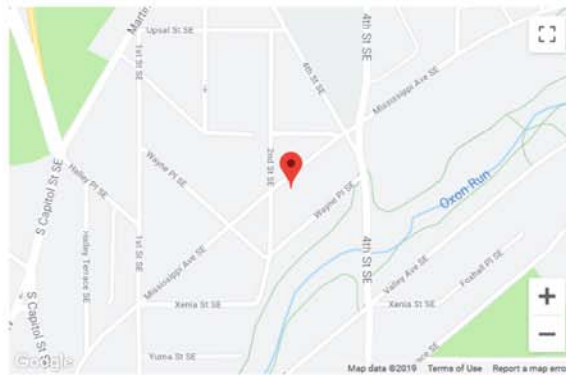
Bedrooms: 1- and 2-Bedrooms

Bathrooms: 1 – 2.5

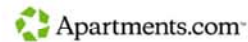
Number of Floors: 2

Parking: Card access parking & on-street parking

Furnished: no



Leasing Information:



FEATURING:

- Full kitchens with gas oven/range, eat-in kitchen, dishwasher, disposal, granite countertops, refrigerator
- Sun-filled dining room
- Beautiful parquet hardwood floors
- Insulated glass, thermal-break windows fold out easily for cleaning
- Individually controlled AC and energy-efficient gas heating
- Cable ready
- Beautiful landscaping with interior private walkways
- Laundry Facilities
- Gated with card access
- Patio



EXHIBIT 2



1 Bedroom \$1,001 - 1,329 2 Bedrooms \$1,150 - 1,414

| All | 1 Bedroom | 2 Bedrooms | | | | |
|-----------|--------------|------------|-------------|----------------------------|---------------|----------------------------|
| 1 Bedroom | 1 Bathroom | \$1,001 | 560 Sq Ft | 1 Bedroom | Available Now | View Model |
| 1 Bedroom | 1 Bathroom | \$1,031 | 816 Sq Ft | 1 bedroom plus dining room | Available Now | View Model |
| 1 Bedroom | 1 Bathroom | \$1,329 | 600 Sq Ft | One Bedroom plus Loft | Available Now | View Model |
| 2 BRs | 1½ Bathrooms | \$1,150 | 650 Sq Ft | 2 bedroom | Not Available | View Model |
| 2 BRs | 1 Bathroom | \$1,279 | 816 Sq Ft | 2 bedroom-Dining Room | Not Available | View Model |
| 2 BRs | 1 Bathroom | \$1,329 | 816 Sq Ft | 2 Bedroom NEWLY REMODELED | Not Available | View Model |
| 2 BRs | 2½ Bathrooms | \$1,414 | 1,100 Sq Ft | 2 Bedroom/Private Entrance | Not Available | View Model |

[View Less](#)

Prices and availability subject to change without notice.

844-274-5088

First Name * Last Name *

Email Address * Phone

Contact Via Max Rent

Beds Baths

07/01/2019

Reason for Moving

Message

Email me listings and apartment related info.

[Contact Property](#)

Expenses

One-Time

Application Fee \$50

Utilities Included

Water, Trash Removal, Sewer Included

About Oxon Run Manor Apartments

Award-winning gated community in a park-like setting with electronic access. Choose from a variety of floor plans in both one and two bedroom apartments. Enjoy the view, beauty, and benefit of the 99 acre Oxon Run Park located directly across the street.

****NOT ACCEPTING VOUCHERS AT THIS TIME****

Apartment Amenities

Unique Features

- Breakfast Bar
- enclosed parking

Services

- Laundry Facilities
- Controlled Access
- Property Manager on Site

Kitchen

- Dishwasher
- Disposal
- Granite Countertops
- Eat-in Kitchen
- Kitchen
- Oven
- Range
- Refrigerator

Pet Policy

No Pets Allowed

Property Information

- Built in 1984
- Renovated in Jan 1988
- 165 Units/3 Stories

Features

- Air Conditioning
- Heating
- Ceiling Fans
- Cable Ready
- Tub/Shower
- Handrails
- Intercom

Security

- Controlled Access
- Property Manager on Site

Parking

Surface Lot

1 space. One time fee of \$50 for Key Card for access

Lease Length

12 months

Outdoor Space

- Gated
- Patio

Living Space

- Hardwood Floors
- Carpet
- Tile Floors
- Vinyl Flooring
- Dining Room
- Walk-In Closets
- Linen Closet
- Double Pane Windows
- Window Coverings

EXHIBIT 3



Cornerstone

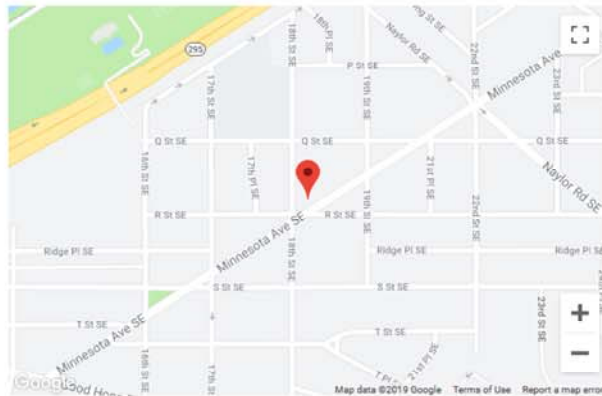
📍 1800 Minnesota Avenue, SE, Washington, DC 20020

This apartment complex offers an inviting, warm environment. Our beautiful one-bedroom apartments are within close proximity to Pennsylvania Avenue and just minutes from Capitol Hill, making Cornerstone the perfect place to call home.

At Cornerstone, our apartments include separate dining rooms, fully-equipped kitchens and convenient laundry facilities.

Enjoy easy access to shopping, schools, restaurants and convenient to commuter locations such as Anacostia Metro Rail.

Bedrooms: 1 **Parking:** Off-street parking
Bathrooms: 1 **Furnished:** No
Number of Floors: 3



Leasing Information:



FEATURING:

- Glass entrance doors with security locks
- Central heat/AC
- Self-controlled energy efficient thermostats
- Sparkling hardwood or parquet floors with some carpet
- Telephone and cable pre-wiring
- Off-street private parking
- Beautiful landscaping
- Laundry facility in each building
- All with separate dining rooms
- Bathrooms with ceramic tile floors and walls
- Fully equipped kitchens



5620 Linda Lane | Camp Springs, MD 20748
301.702.3200 | fax: 301.702.3206

EXHIBIT 4

Cornerstone Apartments

1800 Minnesota Ave SE, Washington, DC 20020 - Anacostia

CoStar Verified®
★★★★☆



1 Bedroom \$953

Home / District of Columbia / Washington / Cornerstone Apartments

C 2 Weeks Ago

844-292-4340



3 Images

| Beds | Baths | Rent | Sq Ft | Available |
|-----------|------------|-------|-----------|---------------------------|
| 1 Bedroom | 1 Bathroom | \$953 | 575 Sq Ft | One Bedroom Available Now |

[View Model](#)

Prices and availability subject to change without notice.

First Name * Last Name *

Email Address * Phone

Contact Via Max Rent

Beds Baths

07/01/2019

Reason for Moving

Message

Email me listings and apartment related info.

[Contact Property](#)

Expenses

One-Time

Application Fee \$50

Utilities Included

Gas, Water, Heat, Sewer Included

About Cornerstone Apartments

One bedroom apartments. Income requirement: Yearly income must be at least \$36,000.00. At this time we are not accepting any vouchers or rapid rehousing.

Apartment Amenities

Pet Policy
No Pets Allowed

Parking
Surface Lot
1 space. Parking Available

Property Information
• Built in 1967
• 47 Units/3 Stories

Lease Length
12 Months

Features
• Air Conditioning
• Heating
• Cable Ready
• Tub/Shower
• Handrails

Services
• Laundry Facilities
• Laundry Service

Kitchen
• Dishwasher
• Disposal
• Kitchen
• Oven
• Range
• Refrigerator

Living Space
• Hardwood Floors
• Carpet
• Tile Floors
• Vinyl Flooring
• Dining Room



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 _____

CURTIS INVESTMENT GROUP, INC.

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.

Michael A. Tilghman II

Clerk of the Court

Name of Plaintiff's Attorney

441 Fourth Street, N.W., Suite 600 South

Address

Washington, D.C. 20001

(202) 727-6247

Telephone

By _____

Deputy Clerk

Date _____

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
 Veá 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: _____

_____ Demandado
CURTIS INVESTMENT GROUP, INC.

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.

Michael A. Tilghman II
Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

441 Fourth Street, N.W., Suite 600 South
Dirección
Washington, D.C. 20001

Por: _____
Subsecretario

(202) 727-6247
Teléfono

Fecha _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
반영을 원하시면 (202) 879-4828 로 전화하십시오 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
See reverse side for English original

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

INFORMATION SHEET

DISTRICT OF COLUMBIA _____ Case Number: _____

vs _____ Date: June 24, 2019

CURTIS INVESTMENT GROUP, INC. One of the defendants is being sued in their official capacity.

| | |
|--|---|
| Name: <i>(Please Print)</i> Michael A. Tilghman II | Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff |
| Firm Name: Office of the Attorney General for the District of Columbia | <input type="checkbox"/> Self (Pro Se) |
| Telephone No.: <u> </u> Six digit Unified Bar No.: (202) 727-6247 <u> </u> 988441 | <input type="checkbox"/> Other: _____ |

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$ Civil Penalties in an amount to be determined Other: Injunctive relief

PENDING CASE(S) RELATED TO THE ACTION BEING FILED
 Case No.: _____ Judge: _____ Calendar #: _____
 Case No.: _____ Judge: _____ Calendar#: _____

| | | |
|---|--|--|
| NATURE OF SUIT: <i>(Check One Box Only)</i> | | |
| A. CONTRACTS | COLLECTION CASES | |
| <input type="checkbox"/> 01 Breach of Contract <input type="checkbox"/> 02 Breach of Warranty <input type="checkbox"/> 06 Negotiable Instrument <input type="checkbox"/> 07 Personal Property <input type="checkbox"/> 13 Employment Discrimination <input type="checkbox"/> 15 Special Education Fees | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent <input type="checkbox"/> 27 Insurance/Subrogation <input type="checkbox"/> 07 Insurance/Subrogation <input type="checkbox"/> 28 Motion to Confirm Arbitration Award (Collection Cases Only) | <input type="checkbox"/> 16 Under \$25,000 Consent Denied <input type="checkbox"/> 18 OVER \$25,000 Consent Denied <input type="checkbox"/> 26 Insurance/Subrogation <input type="checkbox"/> Over \$25,000 Consent Denied <input type="checkbox"/> 34 Insurance/Subrogation <input type="checkbox"/> Under \$25,000 Consent Denied |
| 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, 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 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) (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, Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 09 Special Writ/Warrants (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 checked="" 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 [Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as Judgment [D.C. Code § 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | <input type="checkbox"/> 20 Master Meter (D.C. Code § 42-3301, et seq.) | <input type="checkbox"/> 23 Rule 27(a)(1) (Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage Certificate | | <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

June 24, 2019

Date