IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA Civil Division

DISTRICT OF COLUMBIA, a municipal corporation, 441 Fourth Street, N.W. Washington, D.C. 20001,	
Plaintiff,	Case No.:
v.	
THE BURRELLO GROUP, LLC D/B/A BURRELLO INVESTMENT GROUP, 3443 Annandale Road Falls Church, VA 22042, Serve on: José Burrello	
Registered Agent 3443 Annandale Road Falls Church, VA 22042,	
JOSÉ BURRELLO, Independent Broker I.D. #IB100646 3443 Annandale Road Falls Church, VA 22042,	
Defendants.	

COMPLAINT

Plaintiff the District of Columbia (the District) brings this action against defendants The Burrello Group, LLC, d/b/a Burrello Investment Group, and José Burrello, a District-licensed real estate broker and agent of The Burrello Group, LLC. Defendants are liable for discriminatory practices that limit affordable housing and violate the District of Columbia Human Rights Act (DCHRA), D.C. Code §§ 2-1401.01, *et seq.* In support of its claims, the District states as follows.

INTRODUCTION

1. The District of Columbia faces a housing crisis. Affordable housing stock has trended downward while rents have trended upward, squeezing out low-income tenants. Housing-assistance programs that subsidize rent are a core pillar of the District's response to these pressures. By subsidizing rent, housing assistance programs help the District's lowest-income populations avoid homelessness and maintain a foothold in private housing. This assistance is critical in the District, where many tenants spend more than half of their monthly income on rent.

2. The District brings this action against a District licensed real estate brokerage who posted multiple advertisements that stated that housing assistance would not be accepted as rental payment for a property in the District.

3. Although housing discrimination is problematic in any form, it is even more concerning when perpetuated by the real estate profession. Real estate professionals—including brokers, salespersons and property managers—play an integral role in connecting customers to housing, including low-income tenants seeking an affordable place to live. They may dispense advice to property owners on how to market properties, and they act as gatekeepers for renters and buyers. When a broker discriminates against potential tenants who use housing assistance programs, he not only violates his professional licensing standards but lends dangerous credibility to discriminatory practices.

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4. Defendants' discriminatory online advertisements for rental housing lend professional credence to the idea that turning away tenants based on their source of income is not only acceptable but lawful. In the District, it is neither. Instead, it is a DCHRA violation that is prohibited not only as source-of-income discrimination but, because of the large number of African Americans enrolled in housing assistance programs, as racial discrimination as well.

5. Consequently, the District seeks declaratory and injunctive relief, damages, civil penalties and costs and attorney's fees to prevent and deter defendants from engaging in discriminatory practices that mislead District residents and limit access to housing for vulnerable District residents.

JURISDICTION

6. 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, e.g., 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.").

7. This Court has subject matter jurisdiction over the claims and allegations in the Complaint. *See* D.C. Code § 11-921(a) (2001).

8. This Court has personal jurisdiction over the defendants because the defendants are owners within the meaning of the DCHRA, conducted transactions in real property in the District and had the actual or perceived right to rent or lease 131 R Street, N.E., Washington, D.C. 20002 (the property). D.C. Code § 2-1402.23; *see* §

2-1401.02(20) (identifying "owners" to include managing agents or other persons having the right of ownership or possession of, or the right to sell, rent or lease any real property); *see also* § 2-1401.02(30) (defining a "transaction in real property" as the "advertising ... [of] any interest in real property"). This Court also has personal jurisdiction over the defendants because the defendants have caused tortious injury in the District and transact business in the District of Columbia. § 13-423.

PARTIES

9. Plaintiff the District of Columbia, a municipal corporation, 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 the District's legal business and is responsible for upholding the public interest. D.C. Code § 1-301.81(a)(1); *District of Columbia v. ExxonMobil Oil Corp.*, 172 A.3d 412 (D.C. 2017).

10. Defendant José Burrello is a District-licensed broker who leases residential real estate in the District and surrounding areas. Mr. Burrello also maintains broker licensures in Virginia and Maryland.

11. Defendant The Burrello Group, LLC is a business operating in the District, Virginia, and Maryland, whose primary business address is 3443 Annandale Road, Falls Church, VA 22042.

FACTS

Housing Assistance and the Rental Housing Market in the District

12.The ability to access affordable housing free from discrimination is District residents' top civil rights concern. Office of the Attorney General for the District of Columbia, Community Voices: Perspectives on Civil Rights in the District of Columbia 4 (2019) <u>https://oag.dc.gov/sites/default/files/2019-11/Civil-Rights-</u> Report.pdf. In 2018, more than 23% of the District's tenant households spent more than half of their monthly income on rent. Tom Acitelli, Nearly half of D.C.-area *'cost-burdened,' report says,* renter households Curbed (Oct. 15, 2019), https://dc.curbed.com/2019/10/15/20915332/dc-renter-households-burdened. In recent years, the District's rental housing market has become more expensive while the availability of affordable rental housing has plunged. WES RIVERS, DC FISCAL POLICY INSTITUTE, GOING, GOING, GONE: DC'S VANISHING AFFORDABLE HOUSING https://www.dcfpi.org/wp-content/uploads/2015/03/Going-Going-Gone-Rent-(2015).Burden-Final-3-6-15format-v2-3-10-15.pdf. Housing-assistance programs are a core pillar of the District's response to the growing affordable-housing crisis.

13. Housing assistance programs, including subsidized rent programs, are particularly crucial in the District, where high rents consume a disproportionate share of household expenditures. D.C. Housing Authority, *Housing Choice Voucher Program*,

https://www.dchousing.org/topic.aspx?topid=2&AspxAutoDetectCookieSupport=1 (last visited June 18, 2020). These programs are therefore increasingly important to low-income District tenants seeking to obtain affordable housing and navigate the city's high cost of living.

14. Housing vouchers are one form of housing assistance available to lowincome residents, referred to here as housing voucher holders, and are available through multiple District and District-area agencies and organizations. Housing voucher holders may use their voucher to pay all or part of their monthly rent to subsidize housing costs consistent with their housing voucher programs' requirements. District housing voucher programs include Housing Choice (commonly referred to as Section 8) and Rapid Re-Housing, among others. When discussing housing vouchers, housing providers and advocates often refer to them simply as "vouchers."

15.In the District, over 90 percent of housing voucher holders are African American, although they only account for 48 percent of the total population. See Aastha Uprety and Kate Scott, "In the District, Source of Income Discrimination is Race Discrimination Too," Equal Rights Center (Oct. 12, 2018) https://equalrightscenter.org/source-of-income-and-race-discrimination-dc/ (last visited June 2, 2020). Given the disproportionate number of African Americans using Housing Choice Vouchers in the District, any discrimination based on source of income is 71 times more likely to discriminate against an African American renter rather than a white renter in the District. Id.

Real Estate Professionals Face Myriad Licensing Requirements to Protect Consumers from Discrimination

16. Tenants use many sources to identify affordable housing in the District, including real estate agents and online housing resources. A real estate broker is a firm or person who offers properties for sale, lease or rent. Brokers have responsibility for the actions of any real estate salespersons hired to undertake these activities. *See* D.C. Code § 47-2853.161.

17. A real estate salesperson is someone employed by a licensed real estate broker to offer properties for sale, lease or rent. *See* D.C. Code § 47-2853.171.

18. Recognizing the critical role that real estate professionals play in the housing market, including the market for affordable housing, the District of Columbia Regulatory Affairs' Real Estate Commission requires these professionals to adhere to standards that mandate equitable treatment of housing consumers. *See, e.g.*, D.C. Code § 47-2853.02(d)(1) (requiring a license to "protect the public"); 17 DCMR 2609.1 ("A licensee shall not discriminate or assist any party in discriminating in the sale, rental, leasing, exchange, or transfer of property.")

19. Real estate professionals are reminded of the District's nondiscrimination laws and their obligations during the fair housing training they must take every two years to maintain their licenses. *See* D.C. Code § 47-2853.13.

20. Under their licensing standards, a real estate broker who violates the DCHRA may have her real estate license revoked and face civil—or even criminal—penalties. *See* D.C. Code §§ 47-2843.01, *et seq.*

Discriminatory Advertising

21. Many tenants in the District—including those who receive housing assistance—rely on online housing advertisements to locate rental housing. An apartment-industry survey showed that at least 83 percent of apartment hunters used an online resource to search for housing. J Turner Research, The Internet Adventure: The Influence of Online Ratings on a Prospect's Decision Making 3 (2016), https://www.jturnerresearch.com/hubfs/Docs/J_Turner_Research-

The_Internet_Adventure_Nov2016.pdf. Among the most popular online resources is Craigslist, a website where housing providers can list available units. Approximately 17 percent of all tenants rely on Craigslist to find an apartment. J Turner Research, Marketing to Different Generations: Emerging Online, Language, and Lifestyle Trends 12 (2015), https://www.jturnerresearch.com/courting-the-baby-boomers. Online internet platforms, such as Craigslist, act as a third-party website where housing providers can post listings at no or low cost.

22. More prospective tenants turning to online advertising has led to new opportunities for discriminatory advertising. In 2017 alone, more than 120 advertisements contained language suggesting that the housing provider discriminated based on source of income in the District. Equal Rights Center, *The Equal Rights Center Annual Report 2018* 6 (2018), https://equalrightscenter.org/wp-content/uploads/6.20.19-annual-report-2018-final.pdf.

23. Discriminatory postings and advertisements create permanent barriers in the rental market each day the advertisements are visible. Unlike temporary

restrictions such as "no one-bedroom units available," warnings like "no vouchers accepted" send a lasting message to voucher holders and are likely to permanently discourage them from pursuing that housing opportunity. *Cf.* John M. Yinger et al., *The Status of Research into Racial Discrimination and Segregation in American Housing Markets*, 6 OCCASIONAL PAPERS IN HOUSING AND COMMUNITY AFF. 60 (1979), <u>https://tinyurl.com/housingresearchagenda</u> (describing discrimination that discourages housing seekers from considering certain areas).

Defendants' Discriminatory Practices

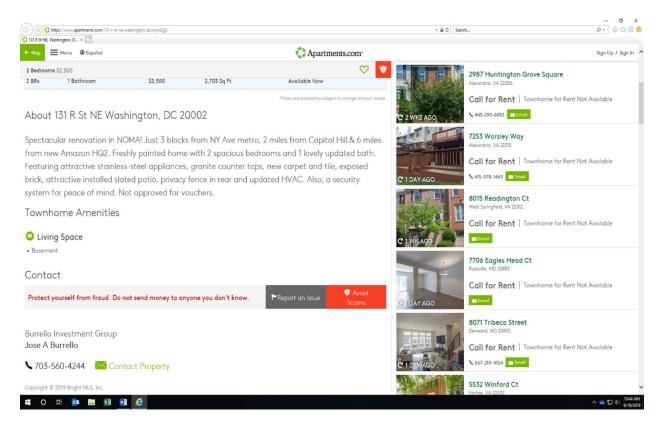
24. Defendants are a real estate broker and his related company. Upon information and belief, Mr. Burrello is the sole real estate broker at The Burrello Group.

25. Beginning on or about September 19, 2019, defendants began advertising for the property, in which there are two rental units, Unit A and Unit B.

26. Defendants used an online listing service to ensure their advertisements for the property were far-reaching. Advertisements for the property were posted on at least seven online platforms between September and November 2019: ColdwellBanksHomes.com, ForRent.com, Apartments.com, Trulia.com, Hotpads.com, Zumper.com and MarylandRealEstateSearch.com. Screenshots of those advertisements are included as Exhibit A.

27. The property's advertisements listed defendants as the point of contact for the property. In each of these advertisements, defendants stated the property was

"Not approved for vouchers." A screenshot of one of the advertisements with the discriminatory language is included below.



28.At least one of the property's rental units remained available through at least February 2020, and discriminatory advertisements for the property using the same "Not approved for vouchers" language appeared on at least five online platforms through ColdwellBankerHomes.com, February 2020: ApartmentList.com, Apartments.com, Compass.com and ForRent.com. Screenshots of these advertisements are attached as Exhibit B.

29. Defendants are aware of their obligations to comply with District and federal anti-discrimination laws.

30. As part of his real estate licensing requirements, Mr. Burrello participated in mandatory fair housing training.

31. Defendants violated the DCHRA each time they posted a discriminatory advertisement. Defendants' discriminatory advertisements discourage potential tenants of the property based on their source of income.

COUNTS I-IX DISCRIMINATORY ADVERTISEMENT IN VIOLATION OF THE DCHRA (Against All Defendants)

32. Paragraphs 1–31 are incorporated here as if repeated in full.

33. Defendant José Burrello, a District-licensed real estate broker and agent of The Burrello Group, LLC, and defendant The Burrello Group, LLC both are responsible for the discriminatory advertisements posted for the property.

34. Defendants posted discriminatory advertisements for the property on at least the following nine online platforms: ColdwellBanksHomes.com, ForRent.com, Apartments.com, Trulia.com, Hotpads.com, Zumper.com, MarylandRealEstateSearch.com, ApartmentList.com and Compass.com.

35. Under the DCHRA it is an "unlawful discriminatory practice" to make "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).

36. Rental payment from a housing voucher is a source of income under the DCHRA. *See* OHR Guidance No. 16-01 (stating that source of income includes "shortand long-term rental subsidies" such as "Housing Choice Vouchers"); *see also* D.C. Code § 2-1402.21(e) (the DCHRA expressly defines "source of income" broadly to

encompass income from all legal sources, including funding from "section 8 of the United States Housing Act of 1937[.]"; D.C. Code § 2-1402.21(29) (expressly defining "source of income" to include "federal payments").

37. Defendants' statements on the online platforms identified in paragraph 34 of this Complaint that the units in the property were "Not approved for vouchers" are discriminatory advertisements based on the actual or perceived source of income of individuals in violation of D.C. Code § 2-1402.21(a)(5).

38. Defendants violated the DCHRA each time they posted a discriminatory advertisement. Defendants' discriminatory advertisements discourage potential tenants of the property based on their source of income.

COUNTS X-XIX DISPARATE IMPACT BASED ON RACE IN VIOLATION OF THE DCHRA (Against All Defendants)

39. Paragraphs 1-38 are incorporated here.

40. Defendants posted discriminatory advertisements on at least nine online platforms: ColdwellBanksHomes.com, ForRent.com, Apartments.com, Trulia.com, Hotpads.com, Zumper.com, MarylandRealEstateSearch.com, ApartmentList.com and Compass.com.

41. 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 ... race ... of any individual." D.C Code § 2-1402.21(a)-(a)(1).

42. Over 90 percent of voucher holders in the District are African American. Defendants' refusal to accept voucher holders also is a discriminatory practice against African Americans.

43. Defendants' policy to discriminate against voucher holders disparately impacts African Americans in the District and is a violation of D.C. Code § 2-1402.21(a)-(a)(1).

44. Defendants violated the DCHRA each time they posted a discriminatory advertisement.

COUNTS XX-XXIX ACTS OF DISCRIMINATION BY A REAL ESTATE BROKER IN VIOLATION OF THE DCHRA (Against Defendant Burrello)

45. Paragraphs 1-44 are incorporated here.

46. Defendant Burrello is a licensed real estate broker in the District of Columbia who posted and acted as the point of contact for discriminatory advertisements for the property.

47. The discriminatory language was published on at least nine online platforms: ColdwellBanksHomes.com, ForRent.com, Apartments.com, Trulia.com, Hotpads.com, Zumper.com, MarylandRealEstateSearch.com, ApartmentList.com and Compass.com.

48. It is an "unlawful discriminatory practice" to make "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). *See* D.C. Code § 2-1402.23 (identifying any real estate broker who violates the discrimination provisions of the DCHRA as a danger to the public interest).

49. Defendant Burrello violated the DCHRA at least nine times when he posted advertisements with discriminatory language on the online platforms identified in paragraph 47 of this Complaint. The advertisements violated the DCHRA on the basis of source of income and race.

50. As a registered real estate broker, defendant Burrello's discriminatory acts violate the DCHRA and therefore have endangered the public interest.

51. Defendant Burrello's violations of the DCHRA also violate D.C. Code § 2-1402.23.

COUNTS XXX-XXXIX ACTS OF DISCRIMINATION BY A REAL ESTATE BROKER IN VIOLATION OF THE DCHRA (Against Defendant The Burrello Group, LLC)

52. Paragraphs 1-51 are incorporated here.

53. Defendant The Burrello Group, LLC is a real estate firm, and through its agent defendant Burrello, posted discriminatory advertisements for the property.

54. The discriminatory language was published on at least nine online platforms: ColdwellBanksHomes.com, ForRent.com, Apartments.com, Trulia.com, Hotpads.com, Zumper.com, MarylandRealEstateSearch.com, ApartmentList.com and Compass.com.

55. It is an "unlawful discriminatory practice" to make "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). *See* D.C. Code § 2-1402.23 (identifying any real estate broker who violates the discrimination provisions of the DCHRA as a danger to the public interest).

56. Defendant The Burrello Group, LLC violated the DCHRA at least nine times when its agent defendant Burrello posted advertisements with discriminatory language on the online platforms identified in paragraph 54 of this Complaint. The advertisements violated the DCHRA on the basis of source of income and race.

57. As a real estate brokerage, defendant The Burrello Group, LLC's discriminatory acts violate the DCHRA and therefore have endangered the public interest.

58. Defendant The Burrello Group, LLC's violations of the DCHRA also violate D.C. Code § 2-1402.23.

PRAYER FOR RELIEF

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

- (a) Injunctive and declaratory relief;
- (b) Damages;
- (c) Civil penalties;
- (d) The District's reasonable attorney's fees and costs and

(e) Such other and further relief as this Court deems appropriate based on the facts and applicable law.

JURY DEMAND

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

Dated: July 1, 2020.

Respectfully submitted,

KARL A. RACINE Attorney General for the District of Columbia

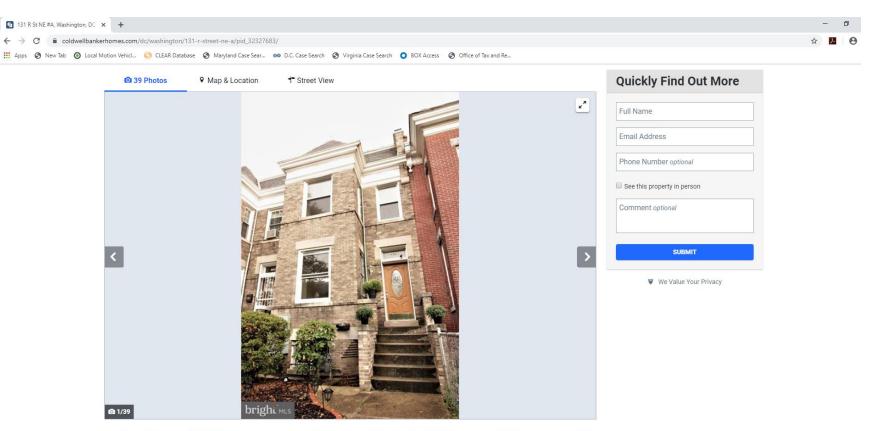
TONI MICHELLE JACKSON Deputy Attorney General Public Interest Division

<u>/s/ Michelle D. Thomas</u> MICHELLE D. THOMAS [993514] Chief, Civil Rights Section Public Interest Division

<u>/s/ Kate L. Vlach</u> KATE L. VLACH [1671390] Assistant Attorney General 441 Fourth Street, N.W., Suite 630 South Washington, D.C. 20001 Tel: (202) 724-6617 Fax: (202) 759-0854 Email: <u>kate.vlach@dc.gov</u>

Counsel for the District of Columbia

EXHIBIT A



Spectacular renovation in NOMA! Just 3 blocks from NY Ave metro, 2 miles from Capitol Hill & 6 miles from new Amazon HQ2. Freshly painted home with 3 spacious bedrooms and 2.5 lovely updated baths. Featuring attractive stainless-steel appliances, granite counter tops, new carpet and tile, gleaming original hardwood floors, exposed brick, warm fireplace, attractive newly painted deck, privacy fence in rear and updated HVAC. Also, a security system for peace of mind. Not approved for vouchers.

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131 R St NE Townhome ♡

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3 Bedrooms	3 Bathrooms	\$4,000	Available Now

Message	
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Prices and availability subject to change without notice.

Contact

Protect yourself from fraud. Do not send money to anyone you don't know. Avoid Scams Report An Issue

Townhome Features

- Dishwasher
- Fireplace

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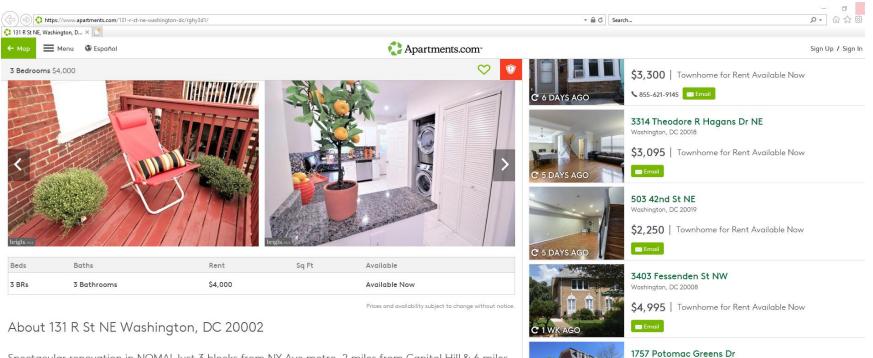
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Living in NoMa provides easy access to Ronald Reagan Washington National, located just 15 minutes from 131 R St NE Townhome.	There are 3 military bases near Washington, DC including US Soldiers & Airmens Home, Marine Corps Barracks and Washington Navy		First Name*	Last Name*	
Other nearby airports include Baltimore- Washington International, located 30.3 miles	Yard. The closest is US Soldiers & Airmens Home which is 2.1 miles away from 131 R St		Email*	Phone	
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131 R St NE Townhome is located in Washington, District of Columbia in the 20002 zip code.





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Townhome Amenities

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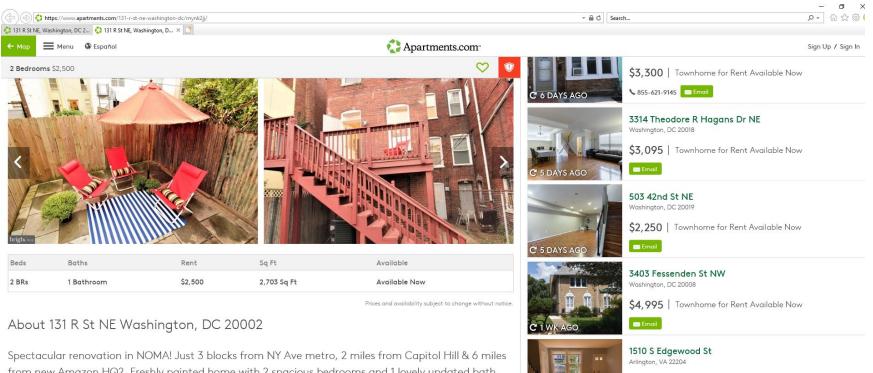
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Silver Spring, MD 20902

10281 Green Holly Terrace

\$4,200 | Townhome for Rent Available Now

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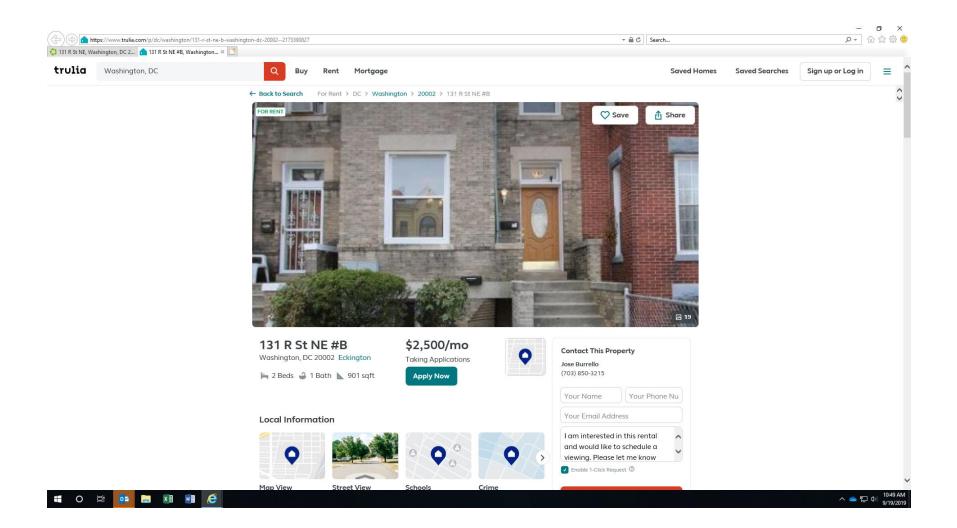
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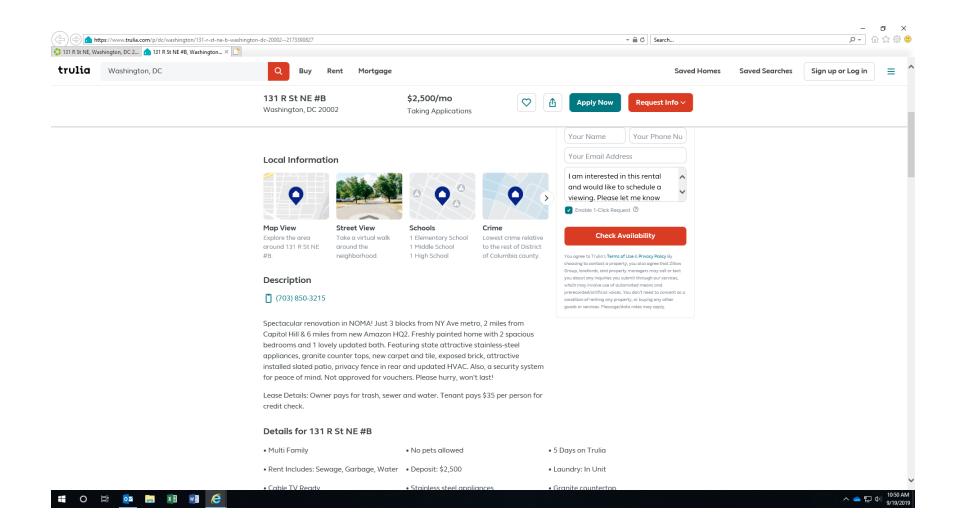
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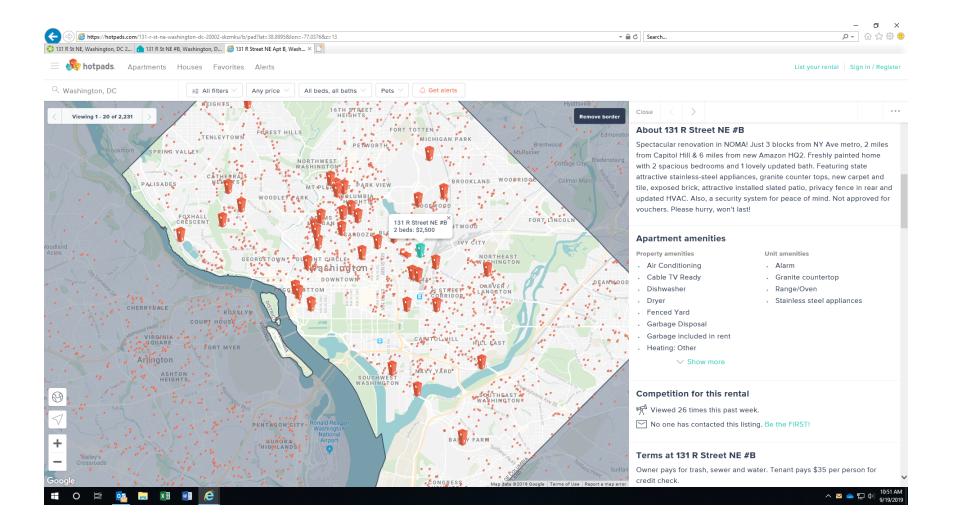
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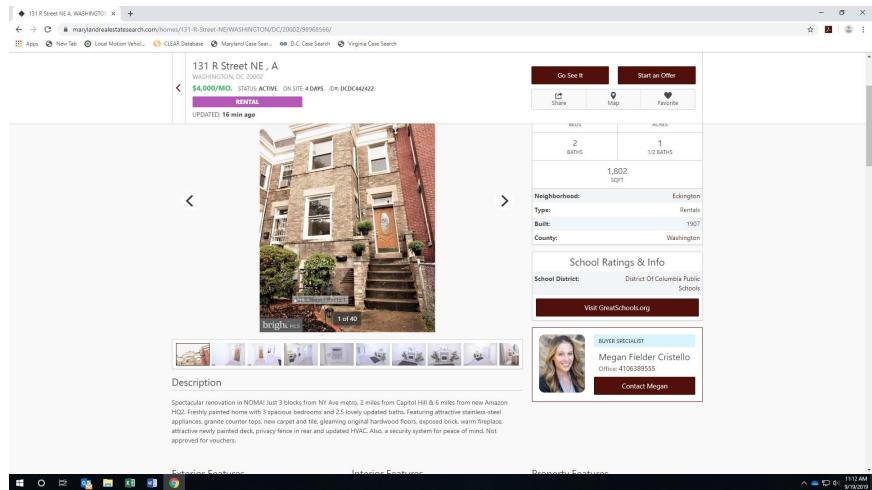
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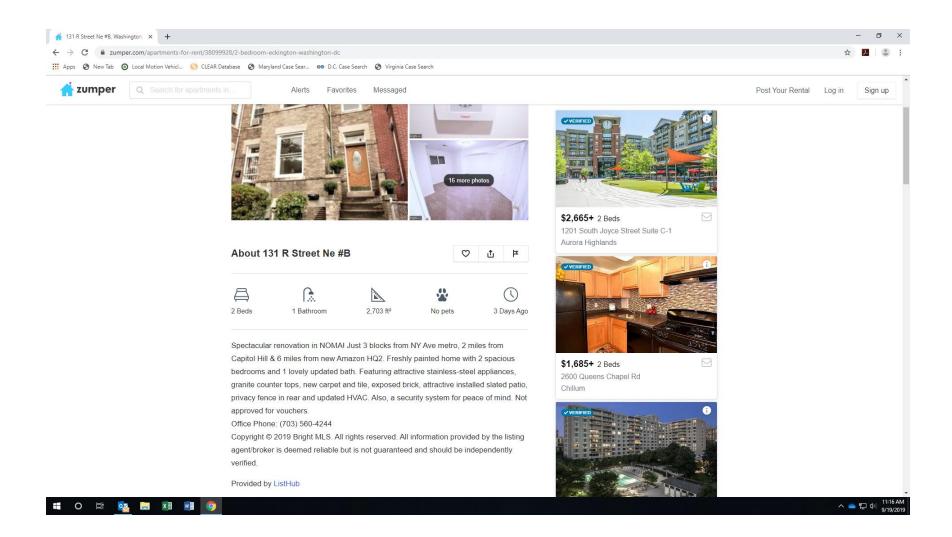
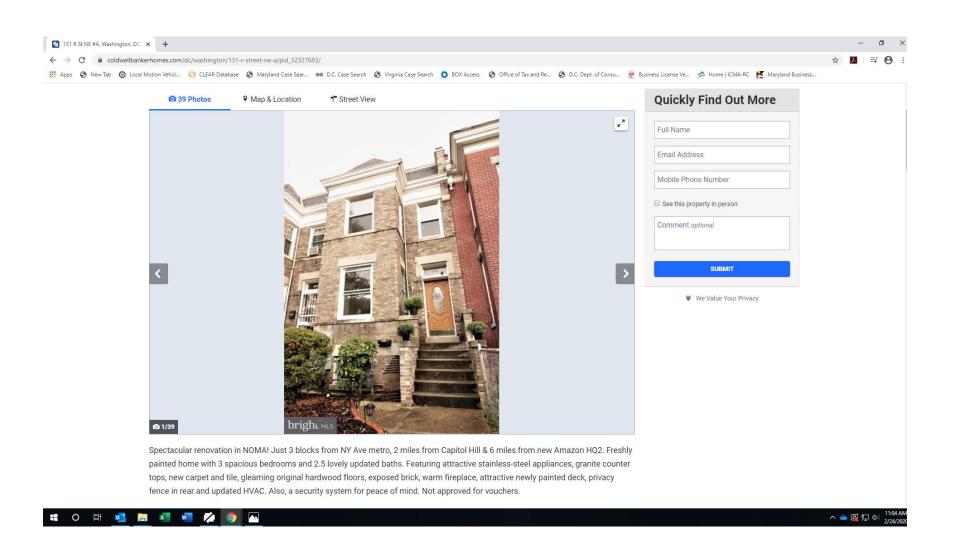
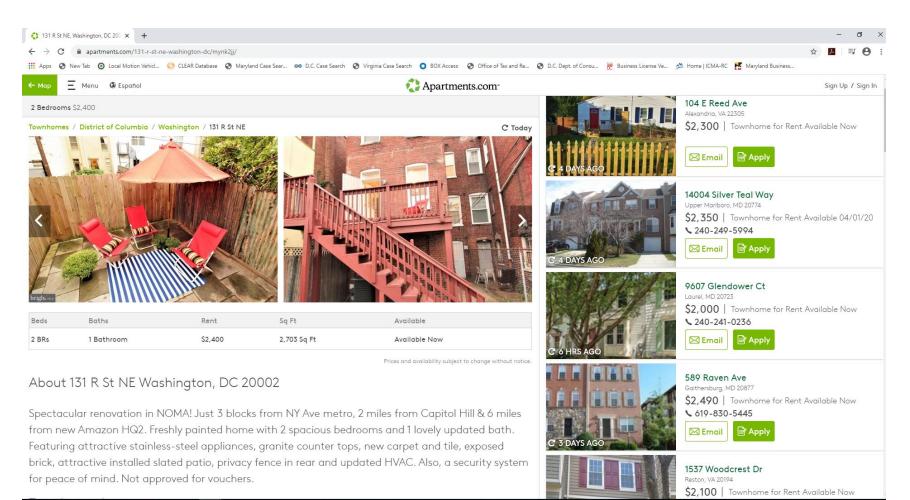


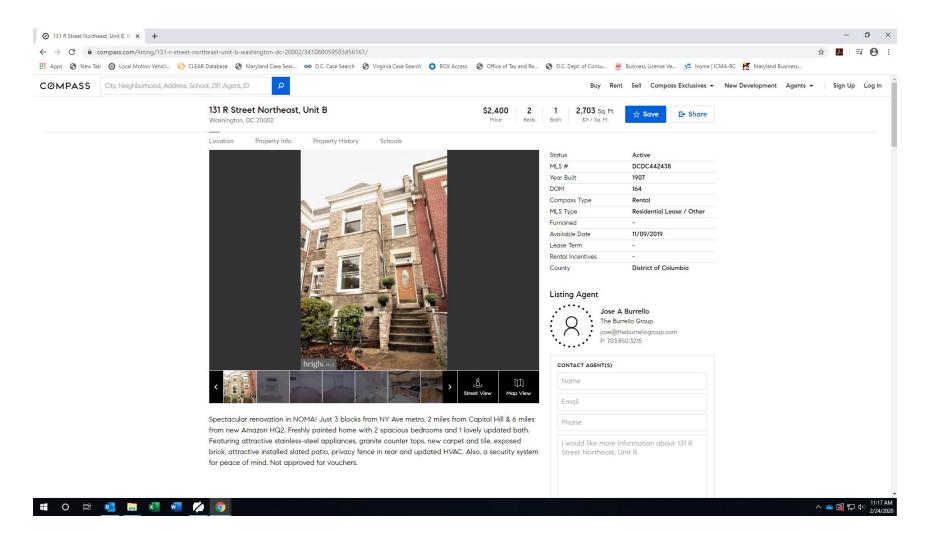
EXHIBIT B



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= Apartment 🕅 List	LIST WITH US	SIGN UP	LOG) IN
	Overview Location Price Amenities Nitty Gritty Neighborhood In reingreau Image: Reingreau Image: Reingreau Image: Reingreau Neighborhood Image: Staniess Steel Image: Reingreau Image: Reingreau Image: Reingreau Neighborhood Spectacular renovation in NOAI Just 3 blocks from NY Ave metro, 2 miles from Capitol Hill & 6 miles Image: Reingreau Image: Reingreau Spectacular renovation in NOAI Just 3 blocks from NY Ave metro, 2 miles from Capitol Hill & 6 miles Image: Reingreau Image: Reingreau Spectacular renovation in NOAI Just 3 blocks from NY Ave metro, 2 miles from capitol Hill & 6 miles Image: Reingreau Image: Reingreau Spectacular renovation in NOAI Just 3 blocks from NY Ave metro, 2 miles from capitol Hill & 6 miles Image: Reingreau Image: Reingreau reingreau Maxeming attractive submity painted decks, privacy fence in reingreau Image: Reingreau Image: Reingreau reingreau Maxeming and updated HVAC. Also, a security system for peace of mind. Not approved for vouchers. Image: Reingreau Image: Reingreau Schools Total Move-In Cost Schools Total Move-In Cost Schools Rein Specials			
	Nitty Gritty How would you like them to get back to you? Income Requirement: Must have 3x the rent in total household income (before taxes, include income from all adults) Full Name Utilities: Renter responsible for all utilities Email Address Pets not allowed Phone Move-in Date			
	Explore the Neighborhood			
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← Map ForRent.com [®] Washin	ngton, DC	Q		Español Add a Listing 🚍
Moving to NoMa, Washington, D			((703) 560-4244
	Military Bases		First Name*	Last Name*
With a TransitScore of 75, 131 R St NE	There are 3 military bases near Washington,			
Townhome has excellent transit, including 1 transit stop within 1.7 miles. Transit options	DC including US Soldiers & Airmens Home, Marine Corps Barracks and Washington Navy		Email*	Phone
include Union Station. Pedestrians can reach	Yard. The closest is US Soldiers & Airmens		Move-in Date	
Union Station with a walk.	Home which is 2.1 miles away from 131 R St NE Townhome.		03/ 01/ 2020	
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Schools				Email Property
Public Schools Private Schools		L Attendance Zone J Nearby O Property Identified	Encil ma listing and a	
Dunbar High School	Mckinley Middle School	Langley Elementary School	Email me listings and a	partment related into.
Grades 9-12	Grades 6-8	Grades PK-5		
617 Students (202) 698-3762	241 Students (202) 281-3950	284 Students (202) 724-4223		
3 out of 10 🗜	4 out of 10 👤	2 out of 10 g		
School data provided by GreatSchools 2				
Property Details				
bedrooms and 2.5 lovely updated baths. Featuring	ng attractive stainless-steel appliances, granite counte	from new Amazon HQ2. Freshly painted home with 3 spacious r tops, new carpet and tile, glearning original hardwood floors, Also, a security system for peace of mind. Not approved for		
131 R St NE Townhome is located in Washington	n, District of Columbia in the 20002 zip code.			



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