

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.

EVOLVE, LLC

1375 Maryland Ave. N.E.
Unit-H
Washington, D.C. 20002

Serve on:

JEFFREY PRINTZ

Registered Agent

1375 G Street N.E.

Loft J

Washington, D.C. 20002, and

EVOLVE PROPERTY MGMT., LLC

1334 H Street N.E.
Washington, D.C. 20002

Serve on:

CHRISTOPHER P. SWANSON

Registered Agent

1344 H Street N.E.

Washington, D.C. 20002

Defendants.

Case No.:

COMPLAINT

Plaintiff District of Columbia (District), by the Office of the Attorney General, brings this action against Defendants Evolve, LLC (Evolve) and Evolve Property Management, LLC (EPM) (together, "Defendants") for violations of the District of Columbia Consumer Protection

Procedures Act (CPPA), D.C. Code §§ 28-3901, *et seq.* In support of its claims, the District states as follows:

Introduction

1. The availability of affordable housing in Washington, DC (DC) 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 DC households depend on federally funded Housing Choice Vouchers (commonly and in this Complaint referred to as “Section 8 vouchers”). Section 8 vouchers provide needed rental assistance to low-income DC tenants 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 Defendants Evolve and EPM, companies engaged in the business of owning, operating, and leasing residential real estate in DC, because Defendants have, and continue to, unlawfully discriminate against Section 8 voucher participants in their leasing of rental housing.

3. For example, Defendants prevent Section 8 participants from scheduling a showing of available rental properties through their website. Prospective tenants may schedule showings of a rental property by submitting an online form, which includes fields such as name, contact information, and whether the prospective tenants “intend to use a Section 8 Voucher to pay [their] monthly rent” (the “Section 8 Question”). At all times relevant to this Complaint, a prospective tenant that answered “yes” in response to the Section 8 Question was automatically denied a showing of the rental property. If the prospective tenant switched the response to “no,”

Defendants' online system would automatically schedule and confirm a showing of the rental property.

4. In addition, Defendants' representatives have verbally communicated their policy that they do not lease their properties to Section 8 participants.

5. Defendants' conduct violates District of Columbia law. The District of Columbia Human Rights Act (HRA) prohibits discrimination on the basis of source of income in the rental housing market. D.C. Code § 2-1402.21(a)(1). Defendants, through their direct and indirect exclusion of Section 8 participants from their rental properties, have engaged in illegal discrimination in violation of the HRA.

6. By offering rental housing—a consumer good—in a discriminatory manner that violates the HRA, Defendants have engaged in unlawful trade practices in violation of the CPPA.

7. The District seeks injunctive relief to prevent Defendants from engaging in these and similar unlawful trade practices, civil penalties and costs to deter Defendants from engaging in these and similar unlawful trade practices, and restitution for consumers.

Jurisdiction

8. This Court has jurisdiction over the subject matter of this case pursuant to D.C. Code §§ 11-921, and 28-3909.

9. This Court has personal jurisdiction over Defendants pursuant to D.C. Code § 13-423(a).

10. The Attorney General for the District of Columbia brings this action pursuant to the authority granted by D.C. Code § 28-3909.

Parties

11. 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 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 specifically authorized to enforce the District's consumer protection laws, including the CPPA, pursuant to D.C. Code § 28-3909.

12. Defendant Evolve, LLC (Evolve) is a Washington, DC limited liability company with its principal place of business in Washington, DC. Evolve, LLC engages in the business of owning and operating residential real estate in DC.

13. Defendant Evolve Property Management, LLC (EPM) is a Washington, DC limited liability company with its principal place of business in Washington, DC. EPM engages in the business of leasing and managing residential real estate to consumers in DC.

Facts

Section 8 Vouchers and the Rental Housing Market in the District

14. 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.

15. In DC, 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 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.

16. One goal of the Section 8 program is to provide low-income households opportunities to access rental housing outside areas of concentrated poverty. A Section 8 voucher provides a household with options and choices that are not available in traditional public housing.

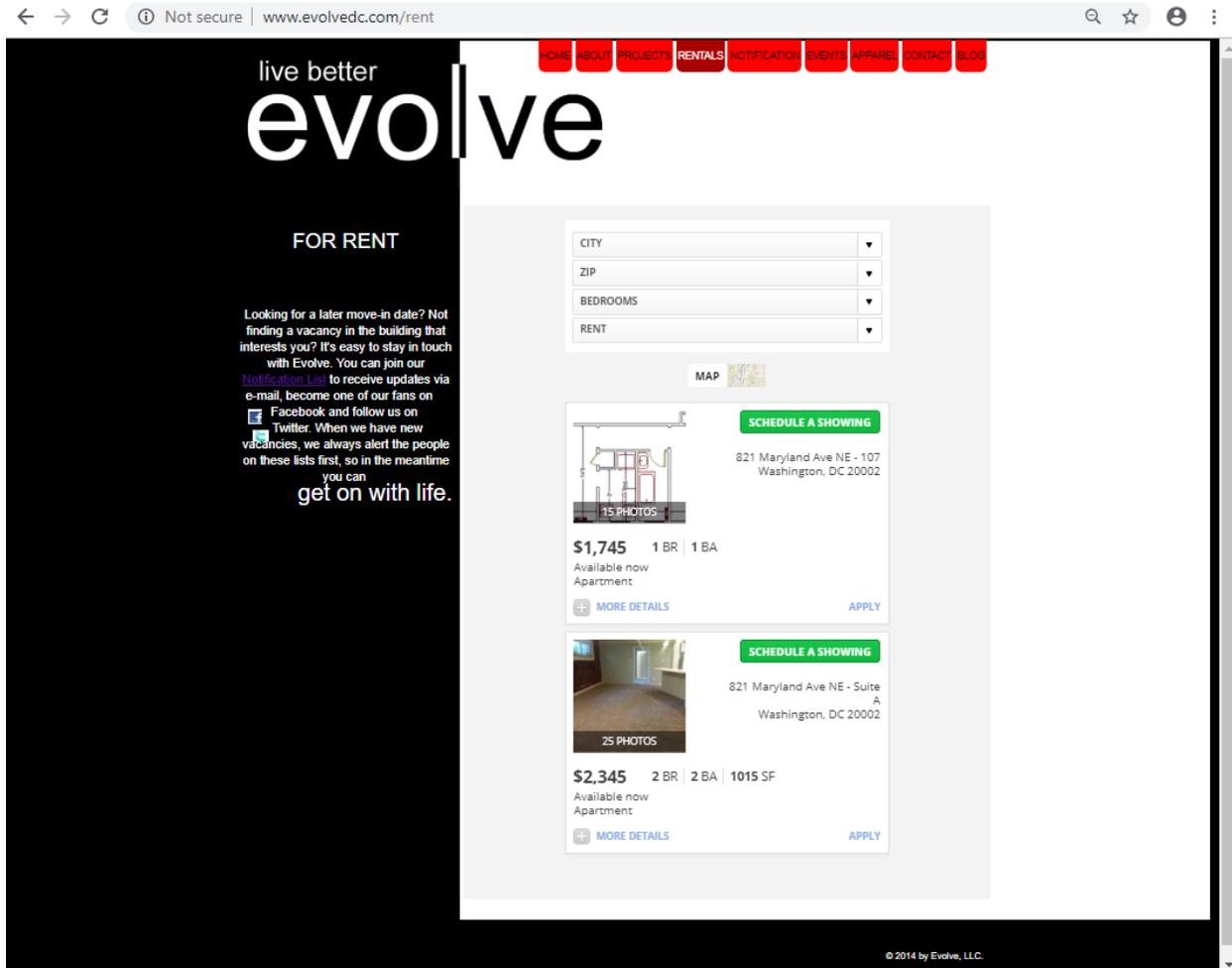
17. For DC's low-income residents, Section 8 assistance is a critical lifeline—by subsidizing rent, households can reallocate spending on other necessities, such as food, transportation, and clothing.

18. Section 8 assistance is particularly crucial in a city like DC, where high rents consume a disproportionate share of household expenditure. According to one study, in 2016, over 22% of DC's tenant households spent more than half of their monthly income on rent. In addition, in recent years, DC's rental housing market has become more expensive while the availability of affordable rental housing has plunged. Section 8 assistance is thus increasingly important to low-income DC tenants seeking to obtain affordable housing and navigate the city's high cost of living.

Defendants' Discriminatory Rental Policies and Practices

19. Defendants are real estate companies based in DC that own and operate rental housing properties. Defendants have offered multiple apartments for lease in DC, including units at an apartment building located at 821 Maryland Avenue NE.

20. Defendants advertise their apartments on their website, www.evolvedc.com, as well as third-party listing services, such as Craigslist. The following screenshot shows how listings appeared on Defendants’ rental website (www.evolvedc.com/rent) as of November 28, 2018:



21. At all relevant times, Defendants have offered, and continue to offer, prospective tenants the opportunity to schedule a showing of each apartment listing on their website. By clicking a “Schedule a Showing” button, the prospective tenant is taken to a separate website, which provides an online form to schedule the showing. The form includes open fields for the prospective tenant to complete, which requests the prospective tenant’s name, phone number, email address, and desired showing times. The form also requires the prospective tenant to answer questions, which include, most critically: “Do you intend to use a Section 8 Voucher to pay your

monthly rent?” (the “Section 8 Question”). A prospective tenant answers this question using a drop-down menu, which includes only two options: “yes” and “no.” Answering this question is required to schedule a showing.

22. Defendants’ web-based scheduling system automatically denies showings to any prospective tenant that answers “yes” to the Section 8 Question. Any prospective tenant who answers “yes” to the Section 8 Question and requests a showing automatically receives a message that states, “We’re sorry, but you do not meet one or more of the requirements for the listing.”

23. The response to the Section 8 Question is dispositive—by simply switching that response to “no” and holding all other responses constant in resubmitting the showing request, Defendants’ scheduling website schedules and confirms a showing for the desired date. This discriminatory practice on Defendants’ website has been in effect since at least April 2018.

24. In addition, at relevant times to this Complaint, Defendants have posted advertisements for rental housing properties in DC that expressly indicated as a condition for the rental that Defendants would not accept Section 8 participants.

25. Defendants’ representatives have also verbally communicated their policy refusing to lease rental housing properties to Section 8 participants.

Defendants’ Discriminatory Rental Policies and Practices Violate the HRA

26. Under the HRA, 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).

27. The HRA 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).

28. The HRA expressly defines “source of income” to include funding from Section 8 vouchers. D.C. Code § 2-1402.02(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.”).

29. Defendants’ statements in advertisements that they would not rent to Section 8 participants 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).

30. Defendants’ policy that bars individuals intending to use Section 8 vouchers from scheduling showings of their rental properties through Defendants’ website 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).

31. Defendants’ policy refusing to accept Section 8 vouchers as payment for their rental properties 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).

Count I: Violations of the Consumer Protection Procedures Act

32. The District incorporates the allegations set forth in the foregoing paragraphs into this Count.

33. The CPPA is a remedial statute that is to be broadly construed. It establishes an enforceable right to enjoin unlawful trade practices regarding consumer goods and services that are or would be purchased, leased, or received in DC.

34. The rental housing that Defendants offer consumers are for personal, household, or family purposes and, therefore, are consumer goods and services.

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

36. DC residents or other individuals who would rent Defendants’ rental housing properties are “consumers” under the CPPA because they are persons who “would [] lease [] consumer goods,” such as the rental housing properties offered by Defendants. D.C. Code § 28-3901(a)(2).

37. Defendants maintain policies and practices with respect to advertising, showing, and/or leasing their rental housing that violate the anti-discrimination provisions of the HRA, which are therefore “unfair or deceptive trade practices” prohibited by the CPPA. D.C. Code § 28-3904; *see also District Cablevision Ltd. Partnership v. Bassin*, 828 A.2d 714, 723 (D.C. 2003) (“Trade practices that violate other laws, including the common law, also fall within the purview of the CPPA.”).

38. Defendants’ failure to disclose to consumers that their policies and practices with respect to advertising, showing, and/or leasing their rental housing properties violate the HRA are material facts, the omission of which tended to mislead consumers and are unfair and deceptive trade practices that violate the CPPA. D.C. Code § 28-3904(f).

Prayer for Relief

WHEREFORE, the District of Columbia respectfully requests this Court enter a judgment in its favor and grant relief against Defendants Evolve, LLC and Evolve Property Management, LLC as follows:

- (a) Enjoin Defendants, pursuant to D.C. Code § 28-3909(a) from violating the CPPA;
- (b) Order Defendants to pay restitution pursuant to D.C. Code § 28-3909(a);
- (c) 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); and
- (d) Award the District the costs of this action and reasonable attorney's fees pursuant to D.C. Code § 28-3909(b); and grant such further relief as the Court deems just and proper.

Jury Demand

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

Respectfully submitted,

Dated: November 28, 2018

KARL A. RACINE
Attorney General for the District of Columbia

ROBYN R. BENDER
Deputy Attorney General
Public Advocacy Division

TONI M. JACKSON
Deputy Attorney General
Public Interest Division

JIMMY R. ROCK
Assistant Deputy Attorney General
Public Advocacy Division

/s/ Benjamin M. Wiseman

BENJAMIN M. WISEMAN [1005442]
Director, Office of Consumer Protection
Public Advocacy Division

/s/ Randolph T. Chen

RANDOLPH T. CHEN [1032644]
Acting Section Chief, Housing & Community Justice
Public Advocacy Division

/s/ Amanda Montee

AMANDA MONTEE [1018326]
STEPHON D. WOODS [1025232]
Assistant Attorneys General

441 4th Street, N.W.
Washington, D.C. 20001
(202) 442-9854 (Phone)
(202) 730-0623 (Fax)
randolph.chen@dc.gov
stephon.woods@dc.gov
amanda.montee@dc.gov

Attorneys for the District of Columbia

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

INFORMATION SHEET

District of Columbia _____ Case Number: _____

vs Date: Nov. 28, 2018

Evolve, LLC and Evolve Property Mgmt., LLC One of the defendants is being sued in their official capacity.

Name: <i>(Please Print)</i> Randolph T. Chen	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>202-442-9854</u> Six digit Unified Bar No.: <u>1032644</u>	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$Restitution and civil penalties 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 Over \$25,000 Pltf. Grants Consent <input type="checkbox"/> 07 Insurance/Subrogation Under \$25,000 Pltf. Grants Consent <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 Over \$25,000 Consent Denied <input type="checkbox"/> 34 Insurance/Subrogation 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 checked="" type="checkbox"/> 05 Deceit (Misrepresentation) <input type="checkbox"/> 14 Malpractice Legal <input type="checkbox"/> 21 Asbestos <input type="checkbox"/> 06 False Accusation <input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death) <input type="checkbox"/> 22 Toxic/Mass Torts <input type="checkbox"/> 07 False Arrest <input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice) <input type="checkbox"/> 23 Tobacco <input type="checkbox"/> 08 Fraud <input type="checkbox"/> 24 Lead Paint		

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

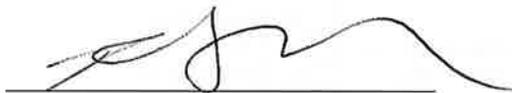
- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
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 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
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
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)
(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
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

Nov. 28, 2018

Date



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

DISTRICT OF COLUMBIA

441 4th Street, NW, Suite 630S Plaintiff

Washington, DC 20001 vs. Case Number _____

EVOLVE, LLC

1375 Maryland Ave. NE, Unit H Defendant

Washington, DC 20002

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 (20) 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 party 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 five (5) 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.

Randolph T. Chen
Name of Plaintiff's Attorney

Clerk of the Court

Office of the Attorney General for DC
Address 441 4th Street, NW, Suite 630 South

By _____
Deputy Clerk

Washington, DC. 20001

(202) 442-9854
Telephone

Date _____

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

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

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

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



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
 500 Indiana Avenue, N.W., Suite 5000
 Washington, D.C. 20001 Teléfono: (202) 879-1133

DISTRICT OF COLUMBIA

441 4th Street, NW, Suite 630S ^{contra} Demandante
 Washington, DC 20001

Número de Caso: _____

EVOLVE, LLC

1375 Maryland Ave. NE, Unit H Demandado
 Washington, DC 20002

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 veinte (20) 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 cinco (5) 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.

Randolph T. Chen
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

Office of the Attorney General for DC
 Dirección 441 4th Street, NW, Suite 630 South
 Washington, DC. 20001
 (202) 442-9854
 Teléfono

Por: _____
 Subsecretario

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
 번역을 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, PODRÍAN RETENERLE SUS INGRESOS, O PODRÍAN TOMAR SUS BIENES PERSONALES O RAÍCES Y VENDERLOS 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 afrontar el costo de 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 de 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
500 Indiana Avenue, N.W., Suite 5000
Washington, D.C. 20001 Telephone: (202) 879-1133**

DISTRICT OF COLUMBIA

441 4th Street, NW, Suite 630S

Plaintiff

Washington, DC 20001

vs.

Case Number _____

EVOLVE PROPERTY MGMT., LLC

1344 H Street NE

Defendant

Washington, DC 20002

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 (20) 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 party 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 five (5) 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.

Randolph T. Chen

Name of Plaintiff's Attorney

Clerk of the Court

Office of the Attorney General for DC

Address 441 4th Street, NW, Suite 630 South

Washington, DC. 20001

(202) 442-9854

Telephone

如需翻译,请打电话 (202) 879-4828

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

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하시면, (202) 879-4828 로 전화하십시오

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

By _____

Deputy Clerk

Date _____

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

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

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



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
 500 Indiana Avenue, N.W., Suite 5000
 Washington, D.C. 20001 Teléfono: (202) 879-1133

DISTRICT OF COLUMBIA

441 4th Street, NW, Suite 630S Demandante
 Washington, DC 20001 contra

Número de Caso: _____

EVOLVE PROPERTY MGMT., LLC
 1344 H Street NE Demandado
 Washington, DC 20002

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 veinte (20) 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 cinco (5) 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.

Randolph T. Chen
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

Office of the Attorney General for DC
 Dirección 441 4th Street, NW, Suite 630 South
 Washington, DC. 20001
 (202) 442-9854
 Teléfono

Por: _____
 Subsecretario

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
 번역을 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, PODRÍAN RETENERLE SUS INGRESOS, O PODRÍAN TOMAR SUS BIENES PERSONALES O RAÍCES Y VENDERLOS 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 afrontar el costo de 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 de otros lugares donde puede pedir ayuda al respecto.

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