

**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,

v.

JAMES ALSTON
633 Audrey Lane,
Oxon Hill, Maryland 20745

And

CHANTESE ALSTON
4427 Hayes Street, NE
Washington, DC 20019

Defendants.

Case No.: _____

JURY TRIAL DEMANDED

FALSE CLAIMS ACT COMPLAINT AND JURY DEMAND

The District of Columbia, by its Office of the Attorney General, brings this action against Defendants James Alston and Chantese Alston under D.C. Code § 2-381.02(a), seeking treble damages and civil penalties, and the common law. The District alleges as follows:

Jurisdiction

1. This Court has subject matter jurisdiction over this case pursuant to D.C. Code § 11-921, as this action is brought by the District, and D.C. Code § 2-381.02, as the District asserts claims arising under the False Claims Act.

2. This Court has personal jurisdiction over Defendants pursuant to D.C. Code § 13-423(a)(1) and (3).

The Parties

3. Plaintiff the District of Columbia (District), 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 brings this action 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), 2-381.03. The Attorney General is specifically authorized to enforce the District's False Claims Act, pursuant to D.C. Code § 2-381.03(a).

4. Defendant James Alston is an individual residing at 633 Audrey Lane, Oxon Hill, Maryland 20745.

5. Defendant Chantese Alston is an individual residing at 4427 Hayes Street, NE, Washington, DC 20019.

Defendant's Children

6. Defendants have a daughter, N.A., who attended Maury Elementary School (Maury Elementary), a District of Columbia Public Schools (DCPS) school, for the spring semester of the 2009-2010 school year and the entirety of the 2010-2011, 2011-2012, 2012-2013, 2013-2014, and 2014-2015 school years. Furthermore, N.A. was enrolled to attend Eliot-Hine Middle School, a DCPS school, for the 2015-2016 school year, and subsequently transferred her enrollment to Parkside Middle, a District of Columbia public charter school, which she attended for the 2015-2016 school year.

7. Defendants have a son, C.A., who attended Maury Elementary for the spring semester of the 2009-2010 school year and the entirety of the 2010-2011, 2011-2012, 2012-2013, 2013-2014, and 2014-2015 school years. Furthermore, C.A. attended Shining Stars Montessori Academy, a District of Columbia public charter school, for the 2015-2016 school year.

District of Columbia False Claims Act

8. The District of Columbia Procurement Reform Amendment Act (the District's False Claims Act) provides for the award of treble damages and civil penalties for, *inter alia*, knowingly making or causing to be made false statements to conceal, avoid, or decrease an obligation to pay money to the District. D.C. Code § 2-381.02(a) (2011 Supp.).

9. The District's False Claim Act was amended in 2013 by the Medicaid Enforcement and Recovery Amendment Act of 2012 (2013 Amendments). 59 D.C. Reg. 13632-41 (2012). The 2013 Amendments became effective on March 19, 2013. 60 D.C. Reg. 9261 (2013).

10. Prior to 2013, the District's False Claims Act stated in relevant part:

(a) Any person who commits of the following acts shall be liable to the District for 3 times the amount of damages which the District sustains

because of the act of that person. A person who commits any of the following acts shall also be liable to the District for the costs of a civil action brought to recover penalties or damages, and may be liable to the District for a civil penalty of not less than \$5,000, and not more than \$10,000, for each false claim for which the person:

- (1) Knowingly presents, or causes to be presented, to an officer or employee of the District a false claim for payment or approval;

D.C. Code § 2-381.02(a) (1) (2011 Supp.).

11. Section 2-381.01(3)(A) of the pre-2013 False Claims Act defined “knowing” or “knowingly” to mean that “a person, with respect to information, does any of the following: (i) Has actual knowledge of the falsity of the information; (ii) Acts in deliberate ignorance of the truth or falsity of the information; or (iii) Acts in reckless disregard of the truth or falsity of the information.” Proof of specific intent to defraud was not required to establish a “knowing” violation under the DC False Claims Act. D.C. Code § 2-381.01(3)(B).

12. The post-2013 version of the District’s False Claims Act includes the following pertinent provisions:

(a) Any person who commits any of the following acts shall be liable to the District for 3 times the amount of damages which the District sustains because of the act of that person. A person who commits any of the following acts shall also be liable to the District for the costs of a civil action brought to recover penalties or damages, and may be liable to the District for a civil penalty of not less than \$5,500, and not more than \$11,000, for each false or fraudulent claim for which the person:

* * *

- (1) Knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval;

* * *

(6) Knowingly makes, uses, or causes to be made or used, a false record or statement material to an obligation to pay or transmit money or property to the District, or knowingly conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the District . . .

D.C. Code § 2-381.02(a) (2013).

13. The District’s False Claims Act defines “[k]nowing” or “knowingly” to mean “[t]hat a person, with respect to information, does any of the following: (i) Has actual knowledge of the information; (ii) Acts in deliberate ignorance of the truth or falsity of the information; or (iii) Acts in reckless disregard of the truth or falsity of the information.”

D.C. Code § 2-381.01(7)(A) (2013). Proof of specific intent to defraud is not required for an act to be knowing. D.C. Code § 2-381.01(7)(B) (2013).

14. The District’s False Claims Act defines “[m]aterial” to mean “having a natural tendency to influence, or be capable of influencing, the payment or receipt of money or property.” D.C. Code § 2-381.01(8).

15. The District’s False Claims Act defines “obligation” to mean “an established duty, whether or not fixed, arising from . . . statute or regulation, or from the retention of any overpayment.” D.C. Code § 2-381.01(9).

Nonresident Tuition

16. D.C. Code § 38-302(a)(2) requires that nonresident tuition be paid for each student who attends a District public school and does not have a parent, guardian, custodian, or other primary caregiver who resides in the District. *See also* D.C. Code § 38-1800.02(25). Nonresident tuition rates are set by the District’s Office of the State Superintendent of Education as the amount necessary to cover all expenses incurred by the District of Columbia public schools or public charter schools for the purpose of educating the student. D.C. Code at § 38-302(b).

17. “Parent” is defined as “natural parent, stepparent, or parent by adoption who has custody or control of a student, including joint custody.” D.C. Code § 38-301(11).

18. Public charter schools in the District are funded by the District and are “open to all students who are residents of the District of Columbia, and, if space is available,” to nonresident students for whom tuition is paid. D.C. Code § 38-1802(6)(a).

19. Nonresidents are required to pay tuition to enroll nonresident children in District public schools because public funds are appropriated to DCPS for the sole purpose of educating children and youth who are residents of D.C. D.C. Code § 38-2902.

District’s Medicaid Program

20. In 1965, Congress established Section XIX of the Social Security Act, 42 U.S.C. §§ 301 *et seq.*, creating a program commonly known as Medicaid. The Medicaid program is a joint federal-state program that provides medical benefits “on behalf of families with dependent children and of aged, blind, or disabled individuals, whose income and resources are insufficient to meet the costs of necessary medical services...” 42 U.S.C. § 1396-1.

21. The District enacted a Medicaid plan that provides Medicaid benefits to “eligible individuals who are residents of the [District].” District’s Medicaid Plan § 2.1. Under this plan, the District makes payments for the covered medical expenses of enrollees. 42 U.S.C. § 1396B.

22. To qualify as a District resident under the District’s Medicaid Program, an individual must be “currently living” in the District, and either (i) intend to remain there permanently or for an indefinite period,” or (ii) have entered the District “with a job commitment or seeking employment.” 42 C.F.R. § 435.403(I)(1).

District's Temporary Assistance for Needy Families (TANF) Program

23. In 1996, Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, which provides block grants to states to establish and operate Temporary Assistance for Needy Families (TANF) programs. 42 U.S.C. §§601 et seq. The TANF program provides cash assistance to help heads-of-households provide for their minor children. D.C. Code § 4-202.01 established TANF as a category of public assistance in the District.

24. To be eligible for public assistance from the District, recipients must be residents of the District. "Recipients of assistance from the District who move to another jurisdiction with intent to remain in that State shall be ineligible to receive assistance from the District immediately upon the date of the recipient's last day of residency in the District of Columbia." D.C. Code § 4-205.04.

Defendants' Children's Attendance at a DCPS School from 2009 through 2014

25. In February 2010, while N.A. and C.A. were attending Maury Elementary, Defendants Chantese Alston and James Alston and their children moved from the District of Columbia to Capital Heights, Maryland. Prior to moving to Maryland, Defendants and their children were residents of the District of Columbia.

26. After moving to Maryland, Defendants maintained N.A. and C.A.'s enrollment as District resident students at Maury Elementary for the duration of the 2009-2010 school year. N.A. and C.A. remained enrolled at Maury Elementary tuition-free, as if they were District residents, for the entirety of the 2010-2011, 2011-2012, 2012-2013, and 2013-2014 school years.

27. During this time, both children resided with Defendants in Maryland.

**Defendants' Failure to Pay Nonresident Tuition Owed to a DCPS School from
2009 through 2014**

28. Nonresident tuition for N.A. to attend Maury Elementary a portion of the 2009-2010 school year and the 2010-2011, 2011-2012, 2012-2013, and 2013-2014 school years totals \$41,416.00.

29. Nonresident tuition for C.A. to attend Maury Elementary for a portion of the 2009-2010 school year and the 2010-2011, 2011-2012, 2012-2013, and 2013-2014 school years totals \$45,917.00.

30. To date, Defendants Chantese Alston and James Alston have not paid any of the nonresident tuition they owe to the District for their children to attend Maury Elementary School, nor have any tuition payments been made on their behalf.

**Defendant Chantese Alston's False Statements to a DCPS School
(2014-2015 School Year)**

31. On April 25, 2014, Defendant Chantese Alston submitted to DCPS Annual Student Enrollment Profile Forms to enroll N.A. and C.A. at Maury Elementary for the 2014-2015 school year.

32. On the Enrollment Profile Forms, Defendant Chantese Alston stated that N.A. and C.A. resided with Defendants at 756 19th Street N.E., Washington, D.C. 20002, and verified that this address was accurate. Defendant Chantese Alston checked the box declaring that she as parent or guardian and the children were D.C. residents. Defendant Chantese Alston signed the form, certifying that the information provided was accurate and that she understood that "providing false information for the purpose of defrauding the government is punishable by law."

33. On April 30, 2014, to complete N.A.'s and C.A.'s enrollment at Maury Elementary for the 2014-2015 school year, Defendant Chantese Alston submitted two DC Residency Verification Forms, one for N.A. and one for C.A.

34. On both Residency Verification Forms, Defendant Chantese Alston indicated that she was the "parent/guardian/caregiver" of N.A. and C.A. She affirmed her District residency at 756 19th Street, N.E., Washington, D.C. 20002, in each form. Defendant Chantese Alston signed both forms, stating that she understood that enrollment of N.A. and C.A. was based on her representation of District residency, and that if the information in the verification forms was false, she would be liable for payment of tuition for N.A. and C.A. for the 2014-2015 school year.

35. Defendant Chantese Alston knew that the information provided on both Enrollment Profile Forms and Residency Verification Forms was false because, at the time in which she submitted the forms, N.A. and C.A. resided with their parents, the Defendants, in Maryland at their family home and not the District address listed on the enrollment and Residency Verification Forms.

36. Relying on the information in the enrollment and Residency Verification Forms submitted by Defendant Chantese Alston, Maury Elementary enrolled N.A. and C.A. as students for the 2014-2015 school year. They were enrolled as District residents.

Defendant Chantese Alston's False Statements to District Schools
(2015-2016 School Year)

37. On April 4, 2015, Defendant Chantese Alston submitted to DCPS an Annual Student Enrollment Profile Form and Residency Verification Form to enroll N.A. into Eliot-Hine Middle School for the 2015-2016 school year. N.A. was subsequently transferred from Eliot-Hine Middle School to Parkside Middle School, a District public

charter school. On May 29, 2015, Defendant Chantese Alston submitted another DC Residency Verification form to complete the transfer of N.A. from Eliot-Hine Middle School to Parkside Middle School.

38. On N.A.'s Enrollment Profile Form, Defendant Chantese Alston stated Joanne Meeks was Defendant Chantese Alston's mother and N.A.'s grandmother. Defendant Chantese Alston further stated that she and N.A. resided with Ms. Meeks at 4605 Bass Place S.E., Washington, D.C. Defendant Chantese Alston checked the box declaring that she was that she was the enrolling parent or guardian and that she and her daughter were D.C. residents. Defendant Chantese Alston signed the form, certifying that the information provided was accurate and that she understood that "providing false information for the purpose of defrauding the government is punishable by law."

39. On August 12, 2015, Defendant Chantese Alston submitted to Shining Start Montessori Academy, a District of Columbia public charter school, an Annual Student Enrollment Profile Form and Residency Verification Form to enroll C.A. into Shining Star Montessori School for the 2015-2016 school year.

40. On C.A.'s Enrollment Profile Form, Defendant Chantese Alston stated that she and C.A. resided at 4605 Bass Place S.E., Washington, D.C. Defendant Chantese Alston signed the enrollment form confirming D.C. residency.

41. On the Residency Verification Forms for both N.A. and C.A., Defendant C. Alston indicated that she was the "parent/guardian/caregiver" of the children. She affirmed her District residency at 4605 Bass Place, S.E., Apt. 202, Washington, D.C. 20019, in each form. Alston signed both forms, stating that she understood that enrollment of N.A. and C.A. was based on her representation of District residency, and

that if the information in the verification forms was false, she would be liable for payment of tuition for N.A. and C.A. for the 2015-2016 school year.

42. Relying on the information in the enrollment and Residency Verification Forms submitted by Defendant Chantese Alston, Eliot-Hine Middle School and Parkside Middle School enrolled N.A. and Shining Star Montessori Academy enrolled C.A. as students for the 2015-2016 school year. They were enrolled as District residents.

43. Defendant Chantese Alston knew that the information provided on the Enrollment Profile Forms and Residency Verification Forms were false because, at the time in which she submitted all relevant documents, N.A. and C.A. resided with their parents, the Defendants, in Maryland at their family home and not the District address listed on the enrollment and Residency Verification Forms.

44. N.A. and C.A. remained enrolled in these District schools as District residents through at least November 30, 2015. After that approximate time, they relocated with their mother Defendant Chantese Alston from Maryland to the District of Columbia.

**Defendant James Alston's Knowing Avoidance of an Obligation to Pay
District Nonresident Tuition**

45. Defendant James Alston, a resident of Maryland, knew he was obligated to pay nonresident tuition for his children to attend DCPS schools and a District public charter school because he knew that he and his family resided in Maryland and not in the District of Columbia.

46. Defendant James Alston also knew that, by failing to notify OSEE, DCPS, Maury Elementary School, Parkside Middle School, or Shining Star Montessori Academy that he, Defendant Chantese Alston, and their children were Maryland residents, he improperly avoided an obligation to pay nonresident tuition to the District, thereby

concealing, avoiding or decreasing his obligation to pay the District by causing the District to decline to charge nonresident tuition for N.A. and C.A.'s attendance at District schools during the 2014-2015 and part of the 2015-2016 school years.

**Defendant's Failure to Pay Nonresident Tuition Owed to District Schools
(2014-2015 and 2015-2016 School Years)**

47. Nonresident tuition for N.A. to attend Park Side Middle School a District public charter school for the 2014-2015 school year and a portion of the 2015-2016 school year until November 30, 2015 totals \$12,925.50.

48. Nonresident tuition for C.A. to attend Shining Star Montessori Academy a District public charter school for the 2014-2015 school year and a portion of the 2015-2016 school year until November 30, 2015 totals \$12,671.50.

49. To date, Defendants Chantese Alston and James Alston have not paid any of the nonresident tuition they owe to the District for their children to attend District schools in these years, nor have any tuition payments been made on their behalf.

**Defendant James Alston's Receipt of Medicaid and TANF Benefits
from the District**

50. Defendant James Alston began receiving benefits as a District resident in 2004. In February 2010, Mr. Alston relocated from the District to Maryland, and in October 2010, he submitted a new application to the District of Columbia Department of Health Services Income Maintenance Division (DHS) using a false District address to resume Medicaid and TANF benefit assistance.

51. From October 2010 through November 2018, Defendant James Alston received Medicaid benefits from the District. James Alston also received TANF benefits from the District from October 2010 through September 2015.

52. From October 2010 through November 2018, the District of Columbia Department of Health Care Finance (DHCF) made monthly capitation payments to a managed care organization (MCO) to finance Mr. Alston's healthcare benefits. These monthly capitation payments totaled \$45,894.32, DHCF also paid \$24,276.93 to the MCO to cover Defendant Alston's health care claims. Furthermore, from October 2010 through September 2015, Defendant James Alston received TANF benefits in the amount of \$11,403.00.

53. In total, from October 2010 through November 2018, Defendant James Alston received Medicaid and TANF benefits in the amount of \$81,574.25. Mr. Alston was not eligible to receive these benefits during these dates because he resided in Maryland and not in the District.

54. To date, Defendant James Alston has not reimbursed the District for any of the Medicaid or TANF benefits he accepted while he was a resident of the state of Maryland, nor have any payments been made on his behalf.

**Defendant James Alston's False Statements to the District in 2013 and 2014
to Receive Medicaid and TANF Benefits**

55. On March 13, 2013, Defendant James Alston submitted a Recertification Form to DHS to continue receiving Medicaid and TANF benefits from a previous approved application.

56. On the Recertification Form, Defendant James Alston stated that he resided at 756 19th Street N.E., Washington, D.C. 20002, and verified that he planned to stay in the District. Based on the Recertification Form, Mr. Alston continued receiving Medicaid and TANF benefits for an additional six months. During this time period, Defendant

James Alston was not eligible to receive these benefits from the District, because he resided in Maryland and not in the District.

57. From March 2013 through August 2013, DHCF made monthly capitation payments to a managed care organization (MCO) to finance Mr. Alston's healthcare benefits. These monthly capitation payments totaled \$1,804.17, DHCF also paid \$3,610.88 to the MCO to cover Mr. Alston's health care claims. Defendant James Alston also received TANF benefits from the District totaling \$1,200.00.

58. On September 16, 2014, Defendant James Alston submitted a Recertification Form to DHS to continue receiving Medicaid and TANF benefits.

59. On the Recertification Form, Defendant James Alston stated that he resided at 756 19th Street N.E., Washington, D.C. 20002, and verified that he planned to stay in the District. Based on the Recertification Form, Mr. Alston continued receiving Medicaid and TANF benefits for an additional six months. During this time period, Defendant James Alston was not eligible to receive these benefits from the District, because he resided in Maryland and not the District.

60. From September 2014 through February 2015, DHCF made monthly capitation payments to an MCO to finance Mr. Alston's healthcare benefits. These monthly capitation payments totaled \$2,171.12, DHCF also paid \$2,422.20 to the MCO to cover Mr. Alston's health care claims. Defendant James Alston also received TANF benefits from the District totaling \$1,159.00.

61. In total, from March 2013 through August 2013 and September 2014 through February 2015, Defendant James Alston received assistance benefits for Medicaid and TANF from the District in the amount of \$12,367.37. Mr. Alston was not eligible to

receive these benefits from the District during this time period, because he resided in Maryland during this time period.

62. To date, Defendant James Alston has not reimbursed the District for any of the Medicaid or TANF benefits he received from March 2013 through August 2013 and September 2014 through February 2015 while residing in the state of Maryland, nor have any payments been made on his behalf.

COUNT I
False Claims Act
Knowingly Making a False Record or Statement
Material to Avoid an Obligation to Pay the District
(D.C. Code §2-381.02(a)(6) (2013))

63. Paragraphs 1 through 62 are realleged as if fully set forth herein.

64. Defendant Chantese Alston knowingly made, used, and caused to be made or used, false records or statements to conceal, avoid, or decrease a material obligation to pay the District. Defendant Chantese Alston knowingly signed and submitted false enrollment documents for her children, causing a District public school and District public charter schools to decline to charge nonresident tuition for N.A.'s and C.A.'s attendance during the 2014-2015 school year and a portion of the 2015-2016 school year in violation of D.C. Code § 2-381.02(a)(6).

COUNT II
False Claims Act
Knowingly Concealing and Knowingly and Improperly
Avoiding or Decreasing and an Obligation to Pay the District
(D.C. Code § 2-381.02(a)(6))

65. Paragraphs 1 through 62 are realleged as if fully set forth herein.

66. Defendant James Alston knowingly concealed and knowingly and improperly avoided or decreased an obligation to pay the District. Defendant James

Alston knew that he had an obligation to pay nonresident tuition for his children, N.A. and C.A., because he, his wife and his children no longer resided in the District after February 2010. However, Defendant J. Alston failed to notify the District of his or his children's correct address, causing a District public school and District public charter schools to decline to charge nonresident tuition for N.A.'s and C.A.'s attendance during the 2014-2015 academic school year, and a portion of the 2015-2016 academic school year in violation of D.C. Code § 2-381.02(a)(6).

COUNT III
Unjust Enrichment (All Defendants)

67. Paragraphs 1 through 62 are realleged as if fully set forth herein.

68. By having their children attend a DCPS school and District public charter schools for the 2010-2011, 2011-2012, 2012-2013, and 2013-2014 school years, and portions of the 2009-2010 and 2015-2016 school years, and by avoiding their obligation to pay nonresident tuition to the District during the period that Defendants and their children lived Maryland, Defendants have been unjustly enriched to the detriment of the District

COUNT IV
False Claims Act
Knowingly Making a False Record or Statement
Material to a False or Fraudulent Claim
(D.C. Code § 2-381.02(a)(1) (2011 Supp.); D.C. Code §2-381.02(a)(1) (2013))

69. Paragraphs 50 through 62 are realleged as if fully set forth herein.

70. Defendant James Alston knowingly made, used, or caused to be used, a false record or statement material to a false or fraudulent claim for payment or approval by the District. Defendant James Alston knowingly signed and submitted false recertification documents to receive District funding for Medicaid and TANF benefits

causing the District to approve and provide District funding to support Defendant James Alston with medical care and food assistance in violation of D.C. Code § 2-381.02(a)(1) (2011 Supp.) and D.C. Code § 2-381.02(a)(1) (2013).

COUNT V
Unjust Enrichment (Defendant James Alston)

71. Paragraphs 50 through 62 are realleged as if fully set forth herein.

72. By accepting Medicaid and TANF benefits from DHCF from October 2010 through November 2018, while he was a resident of Maryland, Defendant James Alston has been unjustly enriched to the detriment of the District.

Prayer for Relief

WHEREFORE, the District respectfully requests that judgment be entered in its favor on its claims, and impose damages and penalties as follows:

(1) On Count I against Defendant Chantese Alston, award the District treble statutory damages in an amount to be determined at trial, but not less than \$76,791.00 (three times \$25,597.00); and civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District for each violation of the District's False Claims Act;

(2) On Count II against Defendant James Alston, award the District treble statutory damages in an amount to be determined at trial, but not less than \$76,791.00 (three times \$25,597.00); and civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District for each violation of the District's False Claims Act;

(3) On Count III against Defendants Chantese Alston and James Alston, award the District actual damages in an amount to be determined at trial, but not less than \$112,930.00;

(4) On Count IV against Defendant James Alston, award the District treble statutory damages in an amount to be determined at trial, but not less than \$37,102.11 (three times \$12,367.37); and civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District for each violation of the District's False Claims Act;

(5) On Count V against Defendant James Alston, award the District actual damages in an amount to be determined at trial, but not less than \$81,574.25.

(6) Award the District interest, costs, and other recoverable expenses permitted by law; and

(7) Award the District such other relief as may be just and proper.

Jury Demand

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

Dated: March 13, 2019

Respectfully submitted,

KARL A. RACINE
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ROBYN R. BENDER
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