

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

<p>DISTRICT OF COLUMBIA, a municipal corporation, 400 6th Street NW Washington, DC 20001,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>10th & C STREETS ASSOCIATES, LLC, 2333 Branch Avenue SE Washington DC 20020,</p> <p style="text-align: center;">and</p> <p>GEORGE PAPAGEORGE, 2333 Branch Avenue SE Washington, DC 20020,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No.: _____</p> <p>JURY TRIAL DEMANDED</p>
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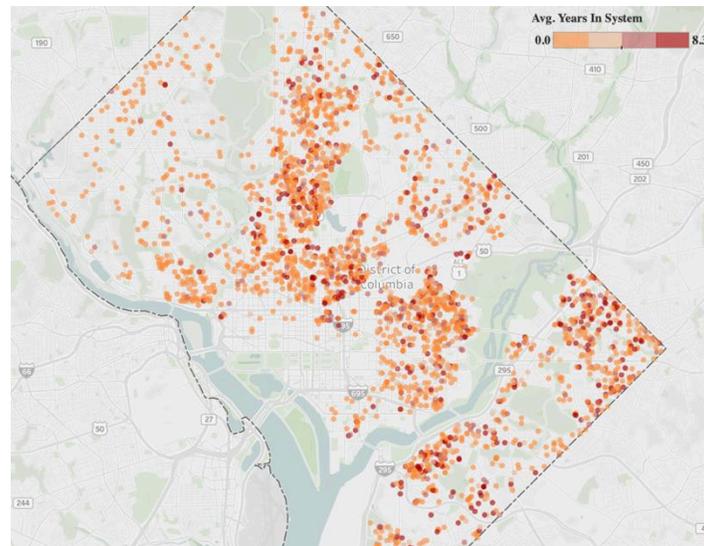
COMPLAINT

The District of Columbia (“District”), by its Office of the Attorney General, brings this enforcement action against Defendants 10th & C Streets Associates, LLC (“10th & C”) and George Papageorge (“Papageorge”), pursuant to the District’s False Claims Act, D.C. Code §§ 2-381.01, *et seq.* (“False Claims Act”), seeking treble damages, civil penalties, and all other appropriate relief, as follows:

Introduction

1. Despite its booming real estate market and shortage of affordable housing, the District of Columbia currently has more than 3,000 properties that sit vacant or blighted. Many of these properties are a public nuisance, attracting crime, drugs, vagrancy, and creating dangerous conditions for area children. The following is a map, as

of January 2022, of vacant properties in the District, as compiled by the District’s Department of Consumer and Regulatory Affairs (“DCRA”):



2. In 2002 and again in 2010, the D.C. Council amended District tax policy to create new real property tax classifications, significantly increasing the property tax rates assessed against vacant and blighted properties. These increased rates were designed to incentivize property owners to return their vacant or blighted properties to productive use by increasing the cost of possessing unused buildings.

3. But rather than pay the increased rates or sell their vacant properties, many property owners instead abuse the administrative system by repeatedly submitting false claims to the District in an effort to circumvent the significantly higher property tax obligations assessed against vacant properties.

4. One of these property owners is Defendant George Papageorge, who owns the property located at 1000 C Street NE, Washington DC 20002 (Square 0963; Lot 0803), through 10th & C, a Delaware LLC not registered to transact business in the District.

5. For more than a decade, this formerly stately home has sat conspicuously vacant: boarded up, overgrown, and with masonry degrading, the roof in a state of perpetual

and visible decay, and vacancy notices from one year pasted on top of weathered vacancy notices from prior years.

6. The house has been standing since the end of the 19th century, and, during its life, many D.C. families have called it home. But during the 21st century it has stood alone—a symbol of neglect and abandonment. Longtime neighbors cannot remember a time when it had human occupants.

7. Yet year after year, Defendants have avoided paying the vacant property tax rate on this obviously vacant property. Each year they avoid registering the property as vacant, and each year they repeatedly and falsely report that the property is occupied. Their fraudulent claims violate the District’s False Claims Act.

Jurisdiction and Parties

8. This Court has jurisdiction over the subject matter of this action through D.C. Code § 11-921 and pursuant to the District’s False Claims Act, D.C. Code § 2-381.03(a). This Court has personal jurisdiction over Defendants pursuant to D.C. Code §§ 13-422 and 13-423.

9. The Plaintiff is the District of Columbia. The District is a municipal corporation empowered to sue and be sued and is the local government for the territory constituting the permanent seat of the government of the United States. The District is represented by its chief legal officer, the Attorney General for the District of Columbia, who has general charge to conduct the legal business of the District. The Attorney General is responsible for upholding the public interest and initiates suits on behalf of the District and its citizens. The Attorney General is charged with the investigation and prosecution of violations of the False Claims Act pursuant to D.C. Code § 2–381.03.

10. Defendant George Papageorge is a District resident who resides at 2333 Branch Avenue SE, Washington, DC 20020.

11. Defendant 10th & C Streets Associates, LLC is a Delaware company—not registered to do business in the District, in violation of D.C. Code § 29-105.03—which gives its address as 2333 Branch Avenue SE, Washington, DC 20020. Through Defendant 10th & C, Defendant Papageorge owns the vacant property located at 1000 C Street NE, Washington, DC 20002.

Vacant Property Taxation in the District

12. The District levies and collects property tax pursuant to D.C. Code §§ 47-811, *et seq.* Properties in the District are taxed at one of four rates, with rates for occupied residential and commercial spaces far lower than the rates levied on vacant and blighted properties. The current rates are as follows:

Tax Rate	Per \$100 (of assessed value)
Class 1 – Residential	\$0.85
Class 2 – Commercial	\$1.65
Class 3 – Vacant	\$5
Class 4 – Blighted	\$10

13. DCRA is tasked with classifying, registering, inspecting, and monitoring Class 3 and Class 4 vacant and blighted properties. DCRA’s tax rate classifications are relayed to the Office of Tax and Revenue (“OTR”), which calculates and levies the appropriate tax twice a year based on the applicable tax rate and the current assessed value of the property.

14. Vacant buildings in the District are added to the vacant property registry in one of two ways. Under D.C. Code § 42-3131.09, property owners are required to prospectively register or renew their vacant buildings each year with DCRA and pay an annual \$250 registration fee. Some property owners do so. But, far more frequently, vacant buildings are added to the registry only after concerned neighbors report a building as vacant and DCRA dispatches its inspectors to make on-site determinations.

15. Vacant building owners can appeal the classification of their properties as vacant or blighted to DCRA. If DCRA rejects their appeal, owners can bring their arguments to the Real Property Tax Appeals Commission (“RPTAC”). *See* D.C. Code § 42-3131.15. Owners who win their appeals with DCRA or RPTAC may have their properties reclassified and subjected to the much lower tax rate shown as “Class 1” or “Class 2” in the table in paragraph 12.

16. D.C. Code § 42-3131.06 specifies several conditions under which the owner of a vacant or blighted property might nevertheless be considered exempt from the higher property tax rates. These conditions include active construction that seeks to make the building fit for occupancy; a good-faith effort to rent or sell the property; ongoing probate litigation; undue economic hardship; and pending zoning board applications. Property owners file for these exemptions with DCRA and are given tax relief if DCRA decides in their favor and changes the property’s tax status with OTR.

17. Owners of long-term vacant and blighted properties have strong economic incentives to abuse this system. The lattice of exemptions and appeals presents a pathway for unscrupulous owners to utilize misrepresentation and deceit to avoid—for long periods—tax rates intended to quickly return vacant properties to productive use.

18. Responding to this seemingly intractable problem, effective on November 13, 2021, the District amended its False Claims Act to make misrepresentations related to the classification and taxation of real properties as vacant or blighted enforceable under the False Claims Act. *See* D.C. Code § 2-381.02(d)(2). The amendment was made explicitly retroactive and covers any claims, records, or statements made on or after January 1, 2015.

Defendants' Evasion of Taxation at 1000 C Street

19. According to official records, media reports, and public testimony, the large red brick home located at 1000 C Street, NE, (“1000 C Street” or the “Property”) has been vacant for more than a decade. Indeed, the Property has been taxed as vacant for only six months in the past 13 years and has been reclassified by DCRA at least 31 times in the past 10 years.

20. These reclassifications are the direct result of proper classifications being overturned after Defendants’ repeated misrepresentations to the District in their continuous effort to avoid an increased tax burden.

21. Defendants’ violations of the False Claims Act date began as early as 2006, when they established a pattern of improperly maintaining the property while avoiding their obligation to pay the proper tax rate.

22. On May 8, 2006, the property was found to be “in such insanitary condition as to endanger the health, safety, or lives of the occupants thereof and/or persons living in the vicinity of the property” and was condemned by the District.

23. After some repair work was completed to remove the condemnation, the property was designated as vacant in 2008, but Defendants received tax rate exemptions by claiming that the property was subject of probate or litigation and, subsequently, by claiming that the property had been listed for sale.

24. On March 25, 2010, DCRA inspected the property and determined it was blighted. Defendants appealed.

25. On March 23, 2011, DCRA inspected the property and again determined it to be blighted. Defendants appealed.

26. In 2012, in order to continue to avoid paying the proper tax rates, Defendants adjusted their strategy when DCRA classified the property as vacant due to it being unoccupied. Shortly thereafter, Defendants began to appeal by falsely claiming that the property was occupied.

27. This pattern has persisted to the present day including the period for which the District now seeks penalties and damages.

28. On July 24, 2015, when the District classified the property as vacant during 2015, Defendants filed a “Vacant Building Response Form” in which they falsely certified that the property was in fact occupied.

29. On March 31, 2016, when the District had classified the property as vacant during 2016, Defendants filed a “Vacant Building Response Form” in which they falsely certified that the property was in fact occupied.

30. On August 31, 2016, Defendants appealed the vacant property tax assessment for 2015 and 2016 to RPTAC, falsely claiming that the Property was not vacant and was instead in current residential use.

31. On May 24, 2017, when the District had classified the property as vacant during 2017, Defendants filed a “Vacant Building Response Form” in which they falsely certified that the Property was in fact occupied.

32. On November 21, 2017, Defendants appealed the vacant property tax assessment for 2017 to RPTAC, falsely claiming that the Property was not vacant and was instead in current residential use.

33. On November 16, 2017, and again on March 12, 2018, when the District classified the property as vacant during 2018, Defendants filed a “Vacant Building Response Form” in which they falsely certified that the Property was in fact occupied.

34. On May 10, 2018, Defendants appealed the vacant property tax assessment for 2018 to RPTAC, falsely claiming that the Property was in current residential use.

35. On November 7, 2018, when that the District classified the property as vacant during 2018 and 2019, Defendants filed a “Vacant Building Response Form” in which they falsely certified that the Property was in fact occupied.

36. On January 3, 2020; June 20, 2020; July 21, 2020; and again, on September 7, 2020; when the District classified the property as vacant for 2020, Defendants filed “Vacant Building Response Form[s]” in which they falsely certified that the Property was in fact occupied.

37. When DCRA sent an inspector to affix the 2020 vacancy classification to the front door of the Property, the 2018 notice was found still posted at the Property:



(2020 Vacant Property Notice Showing 2018 Notice Still Affixed)

38. On March 22, 2021, and again on June 4, 2021, when the District classified the property as vacant during 2021, Defendants filed a “Vacant Building Response Form” in which they again falsely certified that the Property was in fact occupied.

39. On August 17, 2021, Defendants appealed the vacant property tax assessment for 2020 and 2021 to RPTAC, falsely claiming that the Property was not vacant and was instead in current residential use.

40. On September 21, 2017, the Office of the District of Columbia Auditor (“ODCA”) published a detailed report regarding the District’s management of the vacant and blighted property program. The ODCA report pointed specifically to the Property noting that on July 24, 2015, Defendants submitted documentation falsely claiming that the Property was in fact occupied while offering only unconvincing utility bills showing scant usage.

41. Indeed, for each of the above referenced years, Defendants offered only water and electric bills showing extremely limited usage to support their false claim that the Property was occupied—such limited utility usage is inconsistent with occupancy.

42. During each of five separate site visits made by the Office of the Attorney General to the Property from January 2022 through April 2022, the Attorney General’s investigator found the Property vacant but noted that a radio could be heard playing continuously just inside the front entrance. On each such occasion, no one answered the door after lengthy knocking.

43. From 2015 to the present, 1000 C Street has been vacant. Defendants have not occupied the Property, have not leased the Property, and there has been no resident with “an intent to return and occupy the building.” D.C. Code § 42-3131.05(5).

44. Each year from 2015 to 2021, Defendants had an obligation pursuant to D.C. Code § 42-3131.06 to register or renew the Property as vacant and pay the vacant property registration fee; and yet each year Defendants improperly avoided this obligation.

45. The Property was repeatedly, and correctly, designated as vacant by DCRA, and Defendants knowingly avoided an obligation to pay the Class 3 tax rate while—year after year—preparing and presenting false records in service of that avoidance.

COUNT I – FALSE CLAIMS ACT
D.C. Code § 2-381.02(a)(6)

46. The District incorporates by reference the allegations set forth in Paragraphs 1 - 45 above as if fully set forth herein.

47. The District’s False Claims Act, D.C. Code § 2-381.02(a)(6), provides for the award of costs, treble damages, and civil penalties against any person who knowingly makes or uses a false record or false statement material to an obligation to pay or transmit money to the District, or improperly avoids or decreases an obligation to pay.

48. Defendants knowingly presented or caused to be presented false or fraudulent claims to the District by repeatedly submitting documentation claiming that the Property was occupied when it remained persistently vacant.

49. Defendants made these false statements in records created and submitted to both DCRA and RPTAC from 2015–2021, and repeatedly succeeded in unlawfully avoiding an obligation to pay the Class 3 tax rate.

50. These false statements were made knowingly, in an intentional effort to avoid the obligation to pay the Class 3 tax rate that Defendants knew they were obligated to pay on the Property.

51. Each year from 2015–2021 Defendants had an obligation to register the Property as vacant and pay the associated vacant property registration fee, but each year they improperly avoided the obligation to register and pay.

52. As a result of Defendants’ use of these knowingly false records and statements, and of Defendants associated improper avoidance of an obligation to pay, the District was damaged by the amount of fees and taxes that Defendants should have paid.

Prayer for Relief

WHEREFORE, the District respectfully requests that the Court enter judgment in its favor and award it the following relief:

- (1) The amount of the District’s damages to be determined at trial;
- (2) Treble damages pursuant to the District’s False Claims Act in an amount to be determined at trial;
- (3) Civil penalties pursuant to the District’s False Claims Act for each false claim and false record or statement;
- (4) Interest, costs, and other recoverable expenses permitted by law; and
- (5) Such other relief as may be just and appropriate.

Jury Demand

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

Date: May 9, 2022

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

KATHLEEN KONOPKA
Deputy Attorney General
Public Advocacy Division

BY: /s/ James Graham Lake
JAMES GRAHAM LAKE [D.C. Bar No. 1028853]
Chief, Workers' Rights and Antifraud Section
Public Advocacy Division

/s/ Jason Jones
JASON JONES*
PALMER HEENAN [D.C. Bar No. 1017787]
Assistant Attorneys General
400 Sixth Street, N.W., 10th Floor
Washington, DC 20001
jason.jones@dc.gov
(202) 735-7494

Attorneys for the District of Columbia

* Admitted to practice only in Ohio. Practicing in the District of Columbia under the direct supervision of James Graham Lake, a member of the D.C. Bar, pursuant to D.C. Court of Appeals Rule 49(c)(4).

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

District of Columbia

Case Number: _____

vs

Date: May 9, 2022

10th & C Streets Associates LLC and George Papageorge One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> James Graham Lake	Relationship to Lawsuit
Firm Name: D.C. Office of the Attorney General	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: 202-805-7635 Six digit Unified Bar No.:	<input type="checkbox"/> Self (Pro Se)
	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ Restitution, Damages, and Civil Penalties Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar#: _____

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

A. CONTRACTS

COLLECTION CASES

- | | | |
|---|---|---|
| <input type="checkbox"/> 01 Breach of Contract | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 16 Under \$25,000 Consent Denied |
| <input type="checkbox"/> 02 Breach of Warranty | <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 18 OVER \$25,000 Consent Denied |
| <input type="checkbox"/> 06 Negotiable Instrument | <input type="checkbox"/> 27 Insurance/Subrogation | <input type="checkbox"/> 26 Insurance/Subrogation |
| <input type="checkbox"/> 07 Personal Property | Over \$25,000 Pltf. Grants Consent | Over \$25,000 Consent Denied |
| <input type="checkbox"/> 13 Employment Discrimination | <input type="checkbox"/> 07 Insurance/Subrogation | <input type="checkbox"/> 34 Insurance/Subrogation |
| <input type="checkbox"/> 15 Special Education Fees | Under \$25,000 Pltf. Grants Consent | Under \$25,000 Consent Denied |
| | <input type="checkbox"/> 28 Motion to Confirm Arbitration | |
| | Award (Collection Cases Only) | |

B. PROPERTY TORTS

- | | | |
|---|---|--------------------------------------|
| <input type="checkbox"/> 01 Automobile | <input type="checkbox"/> 03 Destruction of Private Property | <input type="checkbox"/> 05 Trespass |
| <input type="checkbox"/> 02 Conversion | <input type="checkbox"/> 04 Property Damage | |
| <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) | | |

C. PERSONAL TORTS

- | | | |
|---|--|--|
| <input type="checkbox"/> 01 Abuse of Process | <input type="checkbox"/> 10 Invasion of Privacy | <input type="checkbox"/> 17 Personal Injury- (Not Automobile, 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) | |

/s/ James Graham Lake

Attorney's Signature

May 9, 2022

Date



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

District of Columbia

 Plaintiff

vs.

Case Number _____

10th and C Streets Associates LLC

 Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Clerk of the Court

 Name of Plaintiff's Attorney

 Address

 Telephone

By _____
 Deputy Clerk

Date _____

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면, (202) 879-4828로 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
 Veá al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

District of Columbia

Demandante

contra

Número de Caso: _____

10th & C Street Associates LLC

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante _____

Por: _____

Dirección _____

Subsecretario

Teléfono _____

Fecha _____

如需翻译, 请打电话 (202) 879-4828

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

Đề có một bài dịch, hãy gọi (202) 879-4828

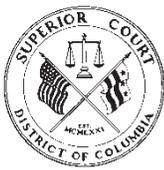
번역통역사무소 (202) 879-4828

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

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



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

District of Columbia

 Plaintiff

vs.

Case Number _____

George Papageorge

 Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Clerk of the Court

 Name of Plaintiff's Attorney

 Address

 Telephone

By _____
 Deputy Clerk

Date _____

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면, (202) 879-4828로 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
 Veá al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

District of Columbia

Demandante

contra

Número de Caso: _____

George Papageorge

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante _____

Por: _____

Dirección _____

Subsecretario

Teléfono _____

Fecha _____

如需翻译, 请打电话 (202) 879-4828

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

Đề có một bài dịch, hãy gọi (202) 879-4828

번역통역사무소 (202) 879-4828

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

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