

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

DISTRICT OF COLUMBIA,
A municipal corporation
400 6th Street NW,
Washington, D.C. 20001,

Plaintiff,

v.

ADOLPHE EDWARDS,
12 Longfellow Street NW
Washington, D.C. 20011

and

A.J. EDWARDS REALTY
12 Longfellow Street NW
Washington, D.C. 20011,

Defendants.

Case No.:

Judge:

JURY TRIAL DEMANDED

**COMPLAINT FOR VIOLATIONS OF THE DISTRICT OF COLUMBIA'S
CONSUMER PROTECTION PROCEDURES ACT AND LEAD HAZARD
PREVENTION AND ELIMINATION ACT**

Plaintiff, the District of Columbia ("District"), through the Office of the Attorney General, files this civil enforcement action against Defendants, Adolphe Edwards and his sole proprietorship, A.J. Edwards Realty, pursuant to the Consumer Protection Procedures Act ("CPPA"), D.C. Code §§ 28-3901, *et seq.* and the District's Lead-Hazard Prevention and Elimination Act ("LHPEA"), D.C. Code §§ 8-231.01, *et seq.*

INTRODUCTION

1. For decades, Defendants have forced tenants to live in apartments with collapsing roofs, mold, chipping and peeling lead-based paint, rat and racoon infestations, and other substandard conditions.

2. Prior decisions of this Court have found widespread, chronic, and systemic Housing Code violations at Defendants' properties. *Aguilar v. A.J. Realty*, 2020 CA 4785 B (D.C. Sup. Ct. July 30, 2021 Order); *Edwards v. Basil*, 2015 LTB 3194 (D.C. Sup. Ct. Dec. 30, 2015 Order).

3. The District's Department of Consumer and Regulatory Affairs ("DCRA") inspected Defendants' properties on 42 occasions between February 2019 and May 2021. During these inspections, DCRA cited Defendants for nearly three hundred Housing Code violations throughout Defendants' multi-family residential properties.

4. Defendants have consistently failed to address lead-based paint hazards in their buildings. From June 2018 to May 2021, DCRA and District Department of Energy and Environment ("DOEE") inspectors observed 75 areas with chipping and peeling paint in Defendants' multi-family residential properties. Defendants' failure to abate chipping and peeling paint at their properties put tenants at substantial risk of life-altering injury. The ingestion of lead by pregnant women and small children can cause life-altering behavioral disorders; especially the dozens of women and children who reside or resided in Defendants' properties.

5. Defendants' neglect of their properties has been a long-term problem.

6. More than a decade ago, Defendants' tenant Latisha Basil "came home to find her living room ceiling on the floor. Sheet rock, ceiling pieces and dust particles were all over the couch and on the floor. . . ." The Superior Court found that photographs taken in 2010 showed "mold, unclean conditions, and cracked paint inside the building hallway. . . ." The Court also found Ms. Basil "complained about unauthorized individuals sleeping and hanging out in the laundry room and credibly testified that the Resident Manager was aware of the situation." The Court further determined that a raccoon "infestation, which began in October of 2010, had significant consequences, including an odor of urine in the unit (which [Ms. Basil's nine-year old] daughter inhaled). The raccoons also made noise and caused urine stains to appear in the ceiling. Eventually, the raccoons knocked a nail out and made a hole in the bedroom ceiling, which was large enough (the size of a donut) for a raccoon to dangle its paw out of the hole." The Court found that in 2015, Ms. Basil had "water damage to the bedroom walls and ceiling as well as a hole or holes in the floor under the sink." Ultimately, Ms. Basil sought relief from these conditions in Superior Court, which awarded her recoupment of rent and other relief.

7. In another, more recent, case brought by a tenant in Superior Court, the Court found evidence showing Maria Aguilar was living in an apartment that had a "collapsed ceiling, a rotted kitchen floor, and outside air and moisture coming through cracks in the walls." Ms. Aguilar also endured a "lack of hot water, broken floors, decaying wood, peeling and chipping paint, holes in the ceiling, cracked and loose plaster in various rooms, and water leaks." The Court granted a temporary

restraining order on December 1, 2020, explaining that Ms. Aguilar “and her family clearly face imminent, irreparable harm as the Court heard testimony about the ceiling collapsing, the possibility of walls caving in, and the risk of the floor collapsing beneath their feet.” Even after the temporary restraining order, violations continued: the Court explained that a new leak developed in Ms. Aguilar’s bathroom that caused “a hole [to] form[] in the wall” and “rodents regularly enter her unit through the hole.” The Court found that “[t]here is also a serious leak in Ms. Aguilar’s bedroom [and] observed photographic and video evidence that demonstrate that when it rains, water literally pours in through the ceiling near the bedroom window.” On July 30, 2021, the Court found that a preliminary injunction was also appropriate, in part because Ms. Aguilar “demonstrated the continued existence of serious housing code violations in the form of significant water leaks that have existed for months, and the presence of vermin in her unit.”

8. For these legal violations, the District seeks injunctive relief, civil penalties, attorneys’ fees, and restitution to tenants whose lives and livelihoods were jeopardized by Defendants’ conduct.

JURISDICTION

9. This Court has subject matter jurisdiction pursuant to D.C. Code § 8-231.15, § 11-921(a)(6), and § 28-3909.

10. The Court has personal jurisdiction pursuant to D.C. Code § 13-423.

PARTIES

11. Plaintiff, the 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 in this enforcement action by its chief legal officer, the Attorney General for the District of Columbia (“OAG”). 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 LHPEA and CPPA. *See* D.C. Code § 8-231.15(e); D.C. Code § 28-3909.

12. Defendant Edwards is the owner of nine multi-family residential apartment buildings, located at 1301 Missouri Avenue NW, 1309 Missouri Avenue NW, 1315 Missouri Avenue NW, 5906 13th Street NW, and 5912 13th Street NW, 2425 Alabama Avenue SE, 2327 Alabama Avenue SE, 2429 Alabama Avenue SE, and 2431 Alabama Avenue SE (the “Properties”). The Properties are spread across two complexes. One five-building, 70-unit complex is located near the intersection of 13th Street NE and Missouri Avenue NE (“Missouri Avenue Complex”). A second, four-building, 53-unit complex is located on Alabama Avenue SE near the road’s intersection with Suitland Parkway (“The Alabama Avenue Complex”). All of the buildings at both complexes were built before 1978 and therefore are presumed to have lead-based paint.

13. Defendant A.J. Edwards Realty is a proprietorship, solely owned by Edwards, that manages, and accepts lease payments for, the multi-family residential apartment buildings described in this Complaint.

FACTS

Defendants' Persistent Violations of the Housing Code and LHPEA

14. Over the last four years, Defendants have committed significant and serious Housing Code and LHPEA violations at the Properties.

15. Defendants have also failed to provide LHPEA-required lead-based paint disclosure forms to tenants at the Properties prior to Defendants entering into leases with tenants.

A. Illegal Conditions at the Missouri Avenue Complex

16. District inspectors have observed LHPEA and Housing Code violations at the Missouri Avenue Complex, including but not limited to 1) chipping and peeling lead-based paint; 2) water damage and plumbing leaks; 3) fire and safety violations; and 4) unsanitary conditions in the common areas.

17. Since at least 2018, District inspectors consistently identified chipping and peeling presumed and confirmed lead-based paint in multiple buildings, units, and common areas of the Missouri Avenue Complex. In June 2018, District inspectors observed chipping and peeling paint throughout a unit and a common area, confirming the paint contained lead with an X-Ray Fluorescence Analyzer. The paint remained in this condition until October 2018. Inspectors again observed chipping and peeling paint in units, the common area, or exterior of the buildings in February,

November, and December of 2019, in June, October, and November of 2020, and in January and May of 2021.

18. As a result of observing presumed lead-based paint in common areas and the exterior of Missouri Avenue Complex buildings in October 2020, DOEE issued administrative orders to Edwards on November 24, 2020 and March 2, 2021. DOEE ordered Edwards to eliminate the lead-based paint hazards and to submit a third-party clearance examination report to DOEE. Edwards has not complied with DOEE's November 24, 2020 or March 2, 2021 administrative orders.

19. Since at least 2019, District inspectors also consistently identified water damage and plumbing leaks in multiple buildings, units, and common areas of the Missouri Avenue Complex. In particular, inspectors observed these illegal conditions in September and December of 2019, June, October, and November 2020, and January and May 2021.

20. Since at least September 2019, District inspectors also consistently identified fire and safety violations at the Missouri Avenue Complex in multiple buildings, units, and common areas. In particular, from September 2019 to May 2021, District inspectors observed the following violations: no smoke detectors, carbon monoxide detectors, fire alarms, or fire extinguishers; broken glass windows; an actively leaking pipe over electrical panels; defective electrical wires and outlets, an electrical panel with corroded and rusted wiring; no safety railing on exterior stairs; and insufficient lighting in common areas. In May 2021, an inspector observed a gas leak in a unit accompanied by no carbon monoxide and smoke detector.

21. Defendants' tenants have also endured unsanitary conditions in the common areas of the Missouri Avenue Complex. For instance, in October 2019, District inspectors saw a heaping pile of trash, old mattresses, and used paint cans in the basement of 5906 13th Street NW. In October 2020, District inspectors smelled strong odors on multiple floors of 5906 13th Street NW, smelled strong *urine* odors on multiple floors in 1315 Missouri Avenue NW, and observed trash and debris on floors throughout 5912 13th Street NW.

B. Illegal Conditions at the Alabama Avenue Complex

22. District inspectors have observed LHPEA and Housing Code violations at the Alabama Avenue Complex, including but not limited to 1) chipping and peeling presumed lead-based paint; 2) water damage and plumbing leaks; and 3) fire and safety violations.

23. Since at least 2019, District inspectors consistently identified chipping and peeling presumed and confirmed lead-based paint in multiple buildings, units, and common areas of the Alabama Avenue Complex. For instance, in May and December of 2019, May, October, and December of 2020, and January of 2021, District inspectors observed chipping and peeling presumed lead-based paint in multiple units and common areas of the Alabama Avenue Complex.

24. Since at least 2019, Edwards tenants have consistently lived with water damage and plumbing violations at the Alabama Avenue Complex. For example, in May of 2019, a District inspector observed damp walls in one unit. In December of 2019, a District inspector observed a unit's bathroom ceiling collapsing from water

damage. In March, May, July, and October of 2020, and in February and May of 2021, District inspectors observed water damage in units and common areas of the Alabama Avenue Complex.

25. Since at least May 2019, District inspectors also consistently identified fire and safety violations at the Missouri Avenue Complex in multiple buildings, units, and common areas. In particular, from May 2019 to May 2021, District inspectors observed the following violations: broken glass windows; inoperative door latches and unsecure and missing entry door locks; inadequate heating in multiple units; no carbon monoxide detectors, smoke detectors, or fire extinguishers; defective and faulty electrical outlets, exposed electrical wires, and electrical hazards such as an out-of-date fuse box and a faulty electrical system that caused a fire in a unit's bathroom.

CLAIMS FOR RELIEF

COUNT ONE

Violations of the LHPEA—Failure to Maintain Residential Buildings Free of Lead-Based Paint Hazards

26. The District incorporates by reference the allegations set forth in all preceding paragraphs.

27. The purpose of the LHPEA is to reduce the risks of lead poisoning among District residents, in particular children aged six and under, by eliminating lead-based paint hazards from properties built prior to 1978.

28. A residential property constructed prior to 1978 is presumed to have lead-based paint. 20 DCMR § 3301.1.

29. A lead-based paint hazard is any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or deteriorated lead-based paint or presumed-lead based paint that is disturbed without containment. D.C. Code § 8-231.01(20).

30. Owners must maintain all dwelling units, including their interior and exterior, and common areas of multifamily properties, constructed prior to 1978 free of lead-based paint hazards. D.C. Code § 8-231.02(a); 20 DCMR § 3301.1.

31. If there is reason to believe that an owner has violated the LHPEA, OAG may bring a civil action to secure a temporary restraining order, a preliminary injunction, a permanent injunction, or other appropriate relief. D.C. Code § 8-231.05(b).

32. DCRA and DOEE inspectors observed 75 instances of chipping and peeling presumed lead-based paint at Defendants' Properties; many of these instances lasted for months.

33. Edwards is an "owner" under the LHPEA.

34. A.J. Edwards Realty is an "owner" under the LHPEA.

35. Defendants violated the LHPEA for each instance and every day of each instance that they failed to maintain a dwelling unit, the exterior of a multifamily property, and common area of a multi-family property, free of deteriorated presumed or actual lead-based paint.

36. The District seeks all appropriate relief for Defendants' failure to maintain their multi-family properties free of lead-based paint hazards, including civil penalties.

COUNT TWO
Violations of the LHPEA—Failure to Comply with DOEE Administrative Orders

37. The District realleges and incorporates by reference the allegations set forth in all preceding paragraphs.

38. Pursuant to D.C. Code § 8-231.03(c) and 20 DCMR § 3318.3, DOEE issued Administrative Orders to Edwards on:

- a. November 24, 2020, requiring Edwards to eliminate lead-based paint hazards at 5906 13th Street NW and 5912 13th Street NW and submit third-party clearance examination reports to DOEE; and
- b. March 2, 2021, requiring Edwards to eliminate lead-based paint hazards at 1301 Missouri Avenue NW, 1309 Missouri Avenue NW, and 1315 Missouri Avenue NW, and submit third-party clearance examination reports to DOEE.

39. Edwards is required to comply with DOEE Administrative Orders. D.C. Code § 8-231.03(d)(1)(A) (“Upon receipt of an order . . . the owner of the property shall . . . perform the measures required . . . to eliminate any lead-based paint hazards and underlying conditions[.]”); 20 DCMR § 3318.5(a) (same requirement).

40. Edwards failed to fully comply with DOEE's Administrative Orders.

41. The District is authorized to obtain a preliminary or permanent injunction or other appropriate relief, to enforce compliance with the LHPEA, including DOEE's Administrative Order. D.C. Code § 8-231.15(e).

42. The District seeks all appropriate relief for Edwards' failure to comply with the Administrative Orders in this Count, including a preliminary injunction and civil penalties.

COUNT THREE
Violations of the LHPEA—Failure to Provide Tenants
with Lead-Based Paint Disclosures

43. The District realleges and incorporates by reference the allegations set forth in all preceding paragraphs.

44. The disclosure provisions of the LHPEA requires owners of a dwelling unit built before 1978 to disclose to the tenant of the dwelling unit, prior to entering into a lease, information reasonably known to the owner about the presence of lead-based paint, lead-based paint hazards, and DOEE enforcement actions at the residential unit. D.C. Code § 8-231.04(a)(1); 20 DCMR § 3313.1(a), (b).

45. Owners are required to provide disclosures on DOEE's *Lead Disclosure Form*. D.C. Code § 8-231.04(a)(2); 20 DCMR § 3313.2.

46. Defendants have not complied with the LHPEA disclosure provisions by not providing adequate lead-based paint disclosures to Defendants' tenants.

47. Every failure to provide a proper disclosure to a tenant of each dwelling unit is a separate violation under the LHPEA.

48. The District seeks all appropriate relief for Defendants' failure to provide lead-based paint disclosures to tenants, including civil penalties and injunctive relief.

COUNT FOUR
Unlawfully Providing False or Misleading Information to Consumers
in Violation of the CPPA

49. The District realleges and incorporates the allegations in the preceding paragraphs.

50. The CPPA was designed to assure that a just mechanism exists to remedy all improper trade practices and deter the continuing use of such practices. D.C. Code § 28-3901(b). It is a remedial statute to be construed and applied liberally to promote its purpose. D.C. Code § 28-3901(c).

51. A person violates the CPPA when they “engage in an unfair or deceptive trade practice, whether or not any consumer is in fact misled, deceived, or damaged. . . .” D.C. Code § 28-3904.

52. Under the CPPA, a person shall not represent that goods or services are of a particular standard, quality, grade, style, or model, if in fact they are another. D.C. Code § 28-3904(d).

53. The CPPA also prohibits a person from misrepresenting a material fact which tends to mislead. D.C. Code § 28-3904(e).

54. Defendants offer rental housing at the 13th Street and Missouri Avenue Complex and the Alabama Avenue SE Complex to consumers for personal, household, or family purposes which, therefore, are consumer goods and services.

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

56. The tenants in the 13th Street and Missouri Avenue Complex and the Alabama Avenue SE Complex are “consumers” under the CPPA because they rented their units in the complexes for personal, household, or family purposes. *See id.* § 28-3901(a)(2).

57. The CPPA authorizes OAG to file suit against any person it has reason to believe “is using or intends to use any method, act, or practice [that is an unlawful trade practice] in violation of . . . D.C. Code § 28-3904.”

58. Under D.C. Code § 28-3904, it is an unlawful trade practice for any person to represent that goods or services have a particular standard, quality, grade, style, or model, if in fact they are of another; misrepresent as to material fact which has a tendency to mislead; or fail to state a material fact if such failure tends to mislead.

59. Defendants committed unfair or deceptive trade practices under the CPPA when, among other acts, Defendants made the following representations:

- a. Implicitly represented to tenants/consumers, through the offering and entering into of leases and other acts, that the 13th Street and Missouri Avenue Complex and the Alabama Avenue SE Complex were safe and habitable and would be maintained in compliance with laws and regulations when, in fact, the 13th Street and Missouri

Avenue Complex and the Alabama Avenue SE Complex was not habitable and Defendants did not maintain the 13th Street and Missouri Avenue Complex and the Alabama Avenue SE Complex in a manner consistent with District laws and regulation, in violation of the Housing Code, 14 DCMR § 400 *et seq.*, and the Property Maintenance Code, 12G DCMR § 101G *et seq.*

- b. Collected rent from tenants/consumers while failing to inform them that Defendants would continuously and systematically fail to maintain the 13th Street and Missouri Avenue Complex and the Alabama Avenue SE Complex in habitable conditions, in violation of the Housing Code, 14 DCMR § 400 *et seq.*, the Property Maintenance Code, 12G DCMR § 101G *et seq.*, and the LHPEA, D.C. Code § 8-231.01 *et seq* and its implementing regulations, 20 DCMR § 3300 *et seq.*

COUNT FIVE
Violations of Title 16 DCMR As CPPA Violations

60. The District realleges and incorporates the allegations in the preceding paragraphs.

61. It is a separate unlawful trade practice under the CPPA to “violate any provision of title 16 of the District of Columbia Municipal Regulations.” D.C. Code § 28-3904(dd).

62. Defendants violated D.C. Code § 28-3904(dd) when they engaged in trade practices that violate District laws and regulations meant to protect and

promote the health, safety, and welfare of tenants, including violation of the Housing Code, 14 DCMR § 400 *et seq.*, the Property Maintenance Code, 12G DCMR § 101G *et seq.*, and the LHPEA's implementing regulations, 20 DCMR § 3300 *et seq.*, all of which are also violations of 16 DCMR §§ 3305 or 4003.

63. Defendants' violations of the Housing Code, the Property Maintenance Code, and the LHPEA's implementing regulations constitute separate violations under the CPPA. D.C. Code § 28-3904(dd).

REQUEST FOR RELIEF

WHEREFORE, the District respectfully request that judgment be entered in its favor and against Adolphe Edwards and A.J. Edwards Realty, and that this Court impose civil penalties, fines, and injunctive and other relief as follows:

1. Award restitution to disgorge the rent amount that Defendants charged and collected from tenants while the 13th Street and Missouri Avenue Complex and the Alabama Avenue SE Complex were in a condition that violated the District's Housing Code or otherwise uninhabitable pursuant to D.C. Code § 28-3909(a);
2. Award civil penalties in an amount to be proven at trial and as authorized per violation of the LHPEA, D.C. Code § 8-231.15(b), and CPPA, D.C. Code § 28-3909(b)(1), (2);
3. Award injunctive relief enjoining Defendants from continuing violations of the LHPEA, directing Defendants to comply with DOEE Administrative Orders and to provide lead-based paint disclosures to tenants at the 13th

Street and Missouri Avenue Complex and the Alabama Avenue SE Complex pursuant to D.C. Code § 8-231.15(e);

4. Award injunctive relief as appropriate against Defendants for the use of any unfair or deceptive trade practices pursuant to D.C. Code 28-3909(a);
5. Award reasonable attorneys' fees pursuant to D.C. Code § 28-3909(b)(4);
6. Award all allowable costs pursuant to D.C. Code § 28-3909(b)(4); and
7. Grant such other relief as this Court deems just and proper.

JURY DEMAND

The District demands a jury trial on all issues triable of right by a jury in this matter.

Dated this 24th of June, 2022.

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of
Columbia

Kathleen Konopka
Deputy Attorney General
Public Advocacy Division

JENNIFER L. BERGER
Chief, Social Justice Section

/s/ Wesley Rosenfeld
WESLEY ROSENFELD [1002428]
MATTHEW M. GANDER [612948]
Assistant Attorneys General
400 6th Street, NW
Washington, D.C. 20001
(202) 368-2569 (phone)
Wesley.Rosenfeld1@dc.gov

Counsel for the District of Columbia

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 checked="" 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/ Wesley Rosenfeld

Attorney's Signature

June 24, 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

400 6th Street NW Plaintiff
 Washington, D.C. 20001 vs.

Case Number _____

Adolphe Edwards Defendant
 12 Longfellow Street NW
 Washington, D.C. 20011

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.

Wesley Rosenfeld

 Name of Plaintiff's Attorney

Clerk of the Court

Office of the Attorney General for the District of Columbia

By _____
 Deputy Clerk

Address
 400 6th Street NW, Washington, D.C. 20001

(202) 368-2569

 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) 879-4828로 전화주세요 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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

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

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



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA

DIVISIÓN CIVIL

Sección de Acciones Civiles

500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001

Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

District of Columbia

400 6th Street NW
Washington, D.C. 20001

Demandante

Adolphe Edwards

12 Longfellow Street NW
Washington, D.C. 20011

Demandado

Número de Caso: _____

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.

Wesley Rosenfeld
Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

Office of the Attorney General for the District of Columbia
Dirección
400 6th Street NW, Washington, D.C. 20001

Por: _____
Subsecretario

(202) 368-2569
Teléfono

Fecha _____

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

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

Vea al dorso el original en inglés
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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

400 6th Street NW
 Washington, D.C. 20001 vs. _____
 Plaintiff

Case Number _____

A.J. Edwards Realty
 12 Longfellow Street NW
 Washington, D.C. 20011
 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.

Wesley Rosenfeld

Clerk of the Court

 Name of Plaintiff's Attorney

Office of the Attorney General for the District of Columbia

 Address
 400 6th Street NW, Washington, D.C. 20001

 Telephone
 (202) 368-2569

By _____
 Deputy Clerk

Date _____

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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

400 6th Street NW
 Washington, D.C. 20001 *contra*

Demandante

A.J. Edwards Realty

12 Longfellow Street NW
 Washington, D.C. 20011

Demandado

Número de Caso: _____

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.

Wesley Rosenfeld
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

Office of the Attorney General for the District of Columbia
 Dirección
 400 6th Street NW, Washington, D.C. 20001

Por: _____
 Subsecretario

(202) 368-2569
 Teléfono

Fecha _____

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