

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

DISTRICT OF COLUMBIA, Plaintiff, v. TRACEY TURNER, <i>et al.</i> , Defendants.	Case No.: 2021 CA 004516 B Judge Danya Dayson
--	--

CONSENT ORDER

This Consent Order (Order) is entered into between Plaintiff District of Columbia (the District) and Defendants Tracey Turner and Turner Development, LLC (collectively, Defendants) to resolve the above-captioned case. The District and Defendants (collectively, the Parties) agree to the entry of this Order.

I. THE PARTIES

1. Plaintiff District of Columbia, a municipal corporation, is the local government for the territory constituting the permanent seat of the government of the United States. The District is represented by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General is responsible for upholding the public interest and is also specifically authorized to enforce the District's Abuse, Neglect and Financial Exploitation of Vulnerable Adults and the Elderly Act.

2. Defendant Tracey Turner is an individual whose last known address is 2901 North Capitol Street N.E., Washington, D.C. 20002.

3. Defendant Turner Development, LLC is a District-based company owned by Defendant Turner, incorporated in the District and whose last known address is 2901 North Capitol Street N.E., Washington, D.C. 20002.

II. FACTUAL AND PROCEDURAL BACKGROUND

4. The District filed this Complaint against Defendants on December 2, 2021, alleging that Defendants violated the District's Abuse, Neglect and Financial Exploitation of Vulnerable Adults and the Elderly Act by using deception and emotional coercion to financially exploit N.G., a vulnerable, elderly District resident.

5. Defendants filed an Answer on December 27, 2021, denying the District's allegations. On February 23, 2023, the Parties participated in Multi-Door Mediation and reached a settlement on stipulated terms as set forth herein.

III. THE PARTIES' AGREEMENT

6. The Parties agree to settle this matter. The Parties voluntarily agree to the entry of this Order without adjudication of any questions of law or fact, remedies, or attorneys' fees, and as a full and final compromise settlement of all claims that the District has brought or could have brought under the District's Abuse, Neglect and Financial Exploitation of Vulnerable Adults and the Elderly Act based on the facts alleged in the Complaint filed in Case No. 2021 CA 004516 B.

IV. APPLICATION

7. The provisions of this Order shall apply to Defendant Tracey Turner and to Defendant Turner Development, LLC and its principals, agents, officers, directors, and employees operating in the normal course of their employment.

V. INJUNCTIVE TERMS

8. Defendants shall not financially exploit any vulnerable adults or elderly persons in violation of the District's Abuse, Neglect and Financial Exploitation of Vulnerable Adults and the Elderly Act, D.C. Code § 22-933.01.

9. Defendants shall not engage in any future financial transactions with N.G., and specifically shall not pursue any financial claims Defendants allege to have against N.G., and expressly waive any and all potential claims Defendants may have against N.G. that accrued prior to the date of the entry of this Consent Order.

VI. MONETARY PROVISIONS

10. Within 30 days from the date of the entry of this Order, Defendants shall pay N.G. a total of \$22,000.

11. Payment shall be by check, payable to N.G, and released to Anabel Butler, Assistant Attorney General, or another designee from the Office of the Attorney General, for delivery to N.G.

12. If Defendants fail to pay N.G. within 30 days, judgment will be entered against Defendants for \$22,000, and such judgment will be subject to interest as permissible by law.

VII. ADDITIONAL TERMS

13. This Order represents the full and complete terms of the Parties' settlement agreement.

14. This Order shall be considered effective and fully executed on the date that the Court enters this Order. This Order may be executed in counterparts, and copies of signature pages transmitted electronically shall have the same effect as originals of those signature pages.

15. All notices under this Order shall be provided to the following address by first class

and electronic mail, unless a different address is specified in writing by the party changing such address:

For the District:

Anabel M. Butler
Assistant Attorney General
Public Advocacy Division
Civil Rights & Elder Justice Section
400 Sixth Street, N.W., Suite 10100
Washington, D.C. 20001
(202) 841-6061
Anabel.Butler@dc.gov

For Tracey Turner and Turner Development, LLC:

Elton F. Norman, Esq.
Norman Law Firm PLLC
8720 Georgia Avenue, Suite 1000
Silver Spring, Maryland 20910
(301) 588-4888
enorman@normanlawfirm.net

William T. Jones, Esq.
The Law Offices of William T. Jones, Esq. LLC
1100 Peachtree Street N.E., Suite 250
Atlanta, Georgia 30309
williamtjoneslawoffice@gmail.com

FOR THE DISTRICT OF COLUMBIA:

BRIAN L. SCHWALB
Attorney General for the District of Columbia

By:



ALICIA M. LENDON
Chief, Civil Rights & Elder Justice Section
Public Advocacy Division

Dated: 04/05/23

FOR TRACEY D. TURNER AND TURNER DEVELOPMENT, LLC:

Tracey D Turner

TRACEY D. TURNER

Dated: 4/5/2023

IT IS SO ORDERED, ADJUDGED AND DECREED.

4/5/2023
Dated



The Honorable Danya Dayson
Judge, Superior Court of the District of Columbia