



**Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov**

Case Number: 2024-CAB-005590

Case Style: District Of Columbia v. Oscar Portillo Padilla et al.

INITIAL ORDER

Initial Hearing Date: Friday, 12/13/2024	Initial Hearing Time: 9:30 AM	Courtroom Location: Remote Courtroom 219
Please see attached instructions for remote participation.		
Your case is assigned to Associate Judge Ebony M Scott.		

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure ("Super. Ct. Civ. R.") 40-1, it is hereby ORDERED as follows:

- 1) This case is assigned to the judge and calendar designated above. All future filings in this case shall bear the calendar number and judge's name along with the case number in the caption.
- 2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of the summons, the complaint, and this Initial Order. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4.
- 3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).
- 4) At the time stated above, all counsel and unrepresented parties shall participate in a hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients before the hearing whether the clients are agreeable to binding or non-binding arbitration. This order is the only notice that parties and counsel will receive concerning this hearing.
- 5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference once, with the consent of all parties, to either of the two succeeding days when the calendar is called. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date. No other continuance will be granted except upon motion for good cause shown.
- 6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

Chief Judge Anita M. Josey-Herring

To Join by Computer, Tablet, or Smartphone:

- 1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: dccourts.webex.com/meet/ctb219

Meeting ID: 129 315 2924

- 2) When you are ready, click “Join Meeting”.
- 3) You will be placed in the lobby until the courtroom clerk gives you access to the hearing.

Or to Join by Phone:

- 1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)
- 2) Enter the Webex Meeting ID listed above followed by “##”

Resources and Contact Information:

- 1) For best practices on how to participate in Webex Meetings, click here <https://www.webex.com/learn/best-practices.html>.
- 2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.
- 3) For case questions, call the Civil Actions Branch Clerk’s Office at 202-879-1133.
- 4) To change your method of hearing participation, visit www.dccourts.gov/hearing-information for instructions and forms.

ACCESSIBILITY AND LANGUAGE ACCESS

Persons with Disabilities:

If you have a disability as defined by the American Disabilities Act (ADA) and you require an accommodation, please call 202-879-1700 or email ADACoordinator@dcsc.gov. The D.C. Courts does not provide transportation service.

Interpreting and Translation Services:

The D.C. Courts offers free language access services to people having business with the court who are deaf or who are non-English speakers. Parties to a case may request free translations of court orders and other court documents. To ask for an interpreter or translation, please contact the Clerk's Office listed for your case. For more information, visit <https://www.dccourts.gov/language-access>.

Servicios de interpretación y traducción:

Los Tribunales del Distrito de Columbia ofrecen servicios gratuitos de acceso al idioma a las personas sordas o que no hablan inglés que tienen asuntos que atender en el tribunal. Las partes de un caso pueden solicitar traducciones gratuitas de las órdenes judiciales y otros documentos del tribunal. Para solicitar un intérprete o una traducción, póngase en contacto con la Secretaría de su caso.

Para más información, visite <https://www.dccourts.gov/language-access>.

El acceso al idioma es importante para los Tribunales del Distrito de Columbia. Puede dar su opinión sobre los servicios de idiomas visitando <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። የቃል ወይም የጽሑፍ ትርጓሜ ለመጠየቅ እባክዎን በመዝገብዎ የተዘረዘረውን የጸሀፊ ቢሮ (ክለርክ'ስ ኦፊስ) ያናግሩ። ለተጨማሪ መረጃ <https://www.dccourts.gov/language-access> ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

Tips for Attending Remote Hearings - Civil Division

Your court hearing may be held remotely. This means that you will participate by phone or by video conference instead of coming to the courthouse. Here are some tips on how to prepare.

How do I know if I have a remote hearing?


The Court will contact you to tell you that your hearing is remote. They may contact you by sending you an email, letter in the mail, or by calling you.



How do I take part in a remote hearing?

The Court will give you step-by-step instructions on how to take part in the remote hearing.

If you lose your written notice, call the Civil Actions Clerk's Office for instructions at:

 202-879-1133

Is there anything that I should do before the day of the hearing?

- Let the court know immediately if you cannot join a hearing because you do not have a phone or computer.




Civil Actions Clerk's Office: 202-879-1133

- You may want to contact an attorney for legal help.
- You can also find the list of legal services providers at www.dccourts.gov/services/represent-yourself by clicking on the link that says, "List of Legal Service Providers for Those Seeking an Attorney or Legal Advice".
- Evidence: if you want the judge to review photos or documents, ask the judge how to submit your evidence.
- Witnesses: tell the judge if you want a witness to testify at your hearing.
- Accommodations & Language Access: let the court know if you need an interpreter or other accommodation for your hearing.

Tips for the Hearing



- Join the hearing a few minutes early!
- Charge your computer or phone and make sure you have enough minutes to join the call. Find a private and quiet space. If possible, be alone in a room during the hearing. Try to limit distractions as much as possible. If others are in the room with you, ask if they can be quiet during the hearing.
- Mute your microphone when you are not talking. Mute all sounds on your phone or computer.
- Say your name before you speak so the record is clear. Be prepared to identify your role in the hearing (e.g., observer, plaintiff, defendant, witness, etc.).  is
- Speak slowly and clearly so everyone hears what you are saying.
- Pause before speaking in case there is a lag. Use a headset or headphones if you can. This will free up your hands and sound better.
- Try not to talk over anyone else. Only one person can speak at a time. If you talk while someone else is talking, the judge will not be able to hear you.
- Have all your documents for the hearing in front of you. Have a pen and paper to take notes.
- If you are not ready for your hearing or want to speak with an attorney, you can ask the judge to postpone your hearing for another date.
- If your sound or video freezes during the hearing, use the chat feature or call the Clerk's Office to let them know that you are having technical issues.

Special Tips for Video Hearings

[\(Click here for more information\)](#)



- Download the court's hearing software, WebEx, in advance and do a test run! The Court will provide you with a WebEx link in advance of the hearing.
- Set up the camera at eye level. If you are using your phone, prop it up so you can look at it without holding it.
- Look at the camera when you speak and avoid moving around on the video.
- Wear what you would normally wear to court.
- Sit in a well-lit room with no bright lights behind you.
- If possible, find a blank wall to sit in front of. Remember the judge will be able to see everything on your screen, so pick a location that is not distracting.



District of Columbia Courts



Tips for Using DC Courts Remote

The DC Courts have **remote hearing sites** available in various locations in the community to help persons who may not have computer devices or internet service at home to participate in scheduled remote hearings. The Courts are committed to enhancing access to justice for all.

There are six remote access sites throughout the community which will operate: **Monday – Friday, 8:30 am – 4:00 pm.**

The remote site locations are:

<p>Remote Site - 1 Balance and Restorative Justice Center 1215 South Capitol Street, SW Washington, DC 20003</p>
<p>Remote Site - 2 Balance and Restorative Justice Center 1110 V Street, SE Washington, DC 20020</p>
<p>Remote Site - 3 Balance and Restorative Justice Center 118 Q Street, NE Washington, DC 20002</p>



<p>Remote Site - 4 Balance and Restorative Justice Center 920 Rhode Island Avenue, NE Washington, DC 20018</p>
<p>Remote Site - 5 Reeves Center 2000 14th Street, NW, 2nd Floor Community Room Washington, DC 20009</p>
<p>Remote Site - 6 Reeves Center 2000 14th Street, NW, Suite 300N Office of the Tenant Advocate Washington, DC 20009 <i>*** No walk-ins at this location***</i></p>

If you want to use a remote site location for your hearing, call **202-879-1900** or email DCCourtsRemoteSites@dcsc.gov at least **24 hours before your hearing to reserve a remote access computer station**. If you require special accommodations such as an interpreter for your hearing, please call **202-879-1900 at least 24 hours in advance of your hearing so the Courts can make arrangements**.

You should bring the following items when you come to your scheduled site location

1. Your **case number** and any **hyperlinks** provided by the Courts for your scheduled hearing.
2. Any documents you need for the hearing (evidence), including exhibits, receipts, photos, contracts, etc.
3. Materials for notetaking, including pen and paper.

***Safety and security measures are in place at the remote sites.**

Contact information to schedule your remote access computer station:

Call: **202-879-1900**

Email: DCCourtsRemoteSites@dcsc.gov



Tribunales del Distrito de Columbia

Consejos para usar los sitios de audiencia remota de los Tribunales de DC



Los Tribunales de DC disponen de **sitios de audiencia remota** en distintos centros de la comunidad para ayudar a que las personas que no tienen dispositivos informáticos o servicio de Internet en su casa puedan participar en audiencias remotas programadas. Los Tribunales honran el compromiso de mejorar el acceso de toda la población a la justicia.

En toda la comunidad hay seis sitios de acceso remoto que funcionarán de **lunes a viernes, de 8:30 am a 4:00 pm**.

Los centros de acceso remoto son:

<p>Sitio Remoto - 1 Balance and Restorative Justice Center 1215 South Capitol Street, SW Washington, DC 20003</p>
<p>Sitio Remoto - 2 Balance and Restorative Justice Center 1110 V Street, SE Washington, DC 20020</p>
<p>Sitio Remoto - 3 Balance and Restorative Justice Center 118 Q Street, NE Washington, DC 20002</p>



<p>Sitio Remoto - 4 Balance and Restorative Justice Center 920 Rhode Island Avenue, NE Washington, DC 20018</p>
<p>Sitio Remoto - 5 Reeves Center 2000 14th Street, NW, 2nd Floor Community Room Washington, DC 20009</p>
<p>Sitio Remoto - 6 Reeves Center 2000 14th Street, NW, Suite 300N Office of the Tenant Advocate Washington, DC 20009 <i>*No se puede entrar sin cita previa*</i></p>

Si desea usar un sitio remoto para su audiencia, llame al **202-879-1900** o envíe un mensaje de correo electrónico a DCCourtsRemoteSites@dcsc.gov **al menos 24 horas antes de la audiencia, para reservar una estación de computadora de acceso remoto**. Si necesita adaptaciones especiales, como un intérprete para la audiencia, llame al **202-879-1900 al menos 24 horas antes de la audiencia para que los Tribunales puedan hacer los arreglos necesarios**.

Cuando concurra al sitio programado debe llevar los siguientes artículos

1. Su **número de caso** y todos los **hipervínculos** que le hayan proporcionado los Tribunales para la audiencia programada.
2. Cualquier documento que necesite para la audiencia (prueba), incluidos documentos probatorios, recibos, fotos, contratos, etc.
3. Materiales para tomar nota, como papel y lápiz.

***Los sitios de acceso remoto cuentan con medidas de seguridad y protección.**

Información de contacto para programar su estación de computadora de acceso remoto:

Teléfono: **202-879-1900**

Correo electrónico: DCCourtsRemoteSites@dcsc.gov

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

District of Columbia Case Number: 2024-CAB-005590

vs
Ali Razjooyan, Oscar Portillo Padilla,
4069-4089 Minnesota Ave NE LLC, US Realty
LLC and Elite Residential Services LLC

Date: 8/30/2024

One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> Christopher Peña	Relationship to Lawsuit
Firm Name: Office of the Attorney General for the District of Columbia	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: 202-705-1798 Six digit Unified Bar No.: 888324806	<input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ _____ 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 checked="" 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/ Christopher Peña

Attorney's Signature

8/30/2024

Date

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

DISTRICT OF COLUMBIA

a municipal corporation
400 6th Street NW, 10th Floor
Washington, D.C. 20001

Plaintiff,

v.

ALI RAZJOOYAN

115 Bytham Ridge Lane
Potomac, MD 20854,

OSCAR PORTILLO PADILLA

15105 Jennings Lane
Bowie, MD 20721,

4069-4089 MINNESOTA AVE NE LLC

8 The Green, Suite A
Dover, DE 19901

Serve on:

Ace Corporate Services, Inc.
250 11th Street, NE
Washington, DC 20002

US REALTY LLC

2300 N Street NW
Washington, DC 20037

Serve on:

1st Alliance Resources, LLC
2300 N Street NW, Suite 300-RLK
Washington, DC 20037

ELITE RESIDENTIAL SERVICES LLC

169 Mississippi Avenue, SE, Unit B
Washington, DC 20032

Serve on:

Lounia Fowler
169 Mississippi Avenue, SE, Suite B
Washington, DC 20032

Defendants.

2024-CAB-005590

Case No:

Judge:

JURY TRIAL DEMANDED

COMPLAINT FOR VIOLATIONS OF THE DISTRICT OF COLUMBIA’S CONSUMER PROTECTION PROCEDURES ACT, TENANT RECEIVERSHIP ACT, AND CONSTRUCTION CODE

The District of Columbia (“District”), through the Office of the Attorney General, brings this civil action against Defendants Ali Razjooyan, a/k/a, Sam Razjooyan (“Razjooyan”), Oscar Portillo Padilla (“Padilla”), 4069-4089 Minnesota Ave NE LLC (“4069-4089 Minnesota”), US Realty LLC (“US Realty”), and Elite Residential Services LLC (“Elite Residential”) (collectively, “Defendants”) pursuant to the Consumer Protection Procedures Act (“CPPA”), D.C. Code § 28-3901, *et seq.*, the Tenant Receivership Act (“TRA”), D.C. Code §§ 42-3651.01 – 42.3651.08, and the Construction Code, D.C. Code § 6-1400, *et seq.* In support of its claims, the District states as follows:

INTRODUCTION

1. Minnesota Commons is multi-family residential property owned by 4069-4089 Minnesota, with buildings located at 4069, 4071, 4073, 4075, 4077, 4079, 4081, 4083, 4085, 4087, and 4089 Minnesota Avenue, NE, Washington, DC 20019 (“Minnesota Commons” or the “Property”). Oscar Padilla is the Managing Member of 4069-4089 Minnesota.

2. During all relevant times, US Realty and/or Elite Residential Services managed Minnesota Commons. Defendant Razjooyan is the managing member of US Realty.

3. Since 4069-4089 Minnesota purchased the Property on April 1, 2024, Defendants have neglected basic maintenance and upkeep of the Property, allowing abhorrent conditions to persist and deteriorate even further, in violation of the District’s Housing Code and Property Maintenance Code. Pest and rodent infestations are so pervasive that rodent burrows are visible all over the Property. Mold, leaks, and water damage show evidence of chronic water intrusion. Broken doors and windows leave entire buildings as well as individual units unsecured, allowing

non-residents to access the Property. Trash and debris accumulate, only aggravating the rodent infestation, and have resulted in at least one fire on the Property. Worse still, fire safety equipment is missing, broken, or expired. Minnesota Commons so resembles an abandoned property that the District's Department of Buildings ("DOB") designated three of the buildings as "Blighted Propert[ies]," meaning that they are unsafe, unsanitary, or otherwise threaten the health, safety, or welfare of the community.

4. Meanwhile, Defendants have started illegal and unpermitted construction, leading to the issuance of multiple Stop Work Orders ("SWOs"). Defendants have repeatedly violated these Orders, creating increasingly dangerous conditions for both Property residents and others in the neighborhood.

5. In addition to allowing conditions to deteriorate and proceeding with illegal construction, Defendants are ignoring mandatory licensing and accreditation requirements at every turn. No Defendant has a Basic Business License or property management license, which are required to operate a residential multi-unit property and serve as a vital means of holding landlords accountable to proper rental practices. Additionally, none of the buildings has the required Certificate of Occupancy, which ensures a property can be safely and legally occupied.

6. Defendants' misconduct is harming the District residents who live at the Property. Though only fifteen of the 83 units at the Property appear to be occupied, these tenants have lived there for years. They have remained in the Property while many other tenants moved out in the face of worsening conditions. Many of these long-term tenants are elderly, relying on other tenants for assistance in navigating the challenges of seeking maintenance and repairs.

7. By accepting rent and failing to maintain the Property in compliance with the District Housing Code and Property Maintenance Code, by conducting illegal construction and

ignoring Stop Work Orders, by leasing the Property without a basic business license, by performing property management without a licensed property manager, and by failing to obtain a Certificate of Occupancy, Defendants violate the Consumer Protection Procedures Act. By flagrantly violating Stop Work Orders, Defendants violate the District Construction Code. By failing to abate code violations that threaten the health, safety, and security of tenants, Defendants also violate the Tenant Receivership Act.

8. For these violations of District law and the injuries suffered by the residents of Minnesota Commons, the District seeks injunctive relief, restitution, damages, and all allowable civil penalties.

JURISDICTION

9. This Court has subject matter jurisdiction pursuant to D.C. Code §§ 2-381.03(a), 11-921(a)(6), and 28-3909.

10. This Court has personal jurisdiction over Defendants 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. 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 CPPA and the TRA. *See* D.C. Code §§ 28-3909 and 42-3651.03.

12. Ali (a/k/a Sam) Razjooyan is an individual residing at 115 Bytham Ridge Lane, Potomac, Maryland. Defendant Razjooyan is a Managing Member of US Realty. During all relevant times, Defendant Razjooyan received maintenance request emails that tenants and tenant advocates sent to Defendant US Realty and responded to them directly from his personal email address. Defendant Razjooyan is responsible for directing and supervising US Realty employees.

13. Oscar Portillo Padilla (“Padilla”) is an individual residing at 15105 Jennings Lane, Bowie, MD 20721. Defendant Padilla is the Managing Member of 4069-4089 Minnesota Ave NE LLC. Defendant Padilla is responsible for hiring contractors, planning work, and responding to concerns during construction at the Property.

14. 4069-4089 Minnesota Ave NE LLC (“4069-4089 Minnesota”), is a single asset foreign limited liability company organized under the laws of Delaware. It owns eight multi-unit residential buildings located at 4069, 4073, 4075, 4077, 4079, 4083, 4085, and 4089 Minnesota Avenue, NE, Washington, DC 20019 (“Minnesota Commons” or the “Property”). 4069-4089 Minnesota’s principal business address is 8 The Green, Suite A, Dover, Delaware.

15. US Realty LLC (“US Realty”) is a domestic limited liability company that engages in property management. US Realty’s principal place of business is in the District, and it has a registered agent at 2300 N Street NW, Suite 300-RLK, Washington, D.C.

16. Elite Residential Services LLC (“Elite Residential”) is a domestic, single member limited liability company. Elite Residential’s principal place of business is in the District, and it has a registered agent at 169 Mississippi Avenue, SE, Unit B, Washington, D.C.

FACTUAL BACKGROUND

Defendants Are Neglecting the Unsafe and Unsanitary Conditions at the Property and Ignoring Myriad Code Violations

17. On April 1, 2024, Defendant 4069-4089 Minnesota purchased Minnesota Commons. Since then, Defendants have severely neglected the Property with a disregard for the life, health, and safety of the tenants who live there.

Trash and Pet Feces Pile Up

18. Defendants have allowed massive amounts of trash and construction debris to accumulate on the Property. The accumulation led to a trash fire on July 1, which the fire department was called to put out.

19. Worsening an already dire situation, on or about July 17, the waste management company Defendants had hired removed waste receptacles from all eight buildings on the Property. To date, Defendants have not provided any new waste receptacles. Trash and debris are currently accumulating where the dumpsters used to be. These pictures, taken on August 8, 2024, illustrate the dire situation.



Photos of accumulating and rodent-attracting trash (August 26, 2024)

20. Trash is not the only refuse that has piled up. In one area of the property, non-residents allow their dogs to defecate without removing the waste. This animal waste has accumulated since April 2024 and has become a health hazard that Defendants fail to address.

Exterior Doors Lack Locks

21. Defendants leave all the buildings open to the elements, with unsecured doors and completely open windows. When investigators from the Office of the Attorney General (“OAG”) visited Minnesota Commons on July 16, 2024, only one of eight buildings had a door with a working lock. Several doors are completely hanging from the hinges. Every building has broken windows, and some window frames are empty – no glass, board, or any other covering.

22. Trespassers enter the buildings and have stolen copper pipes, resulting in water gushing out of the plumbing and leaving tenants without running water for hours or even days at a time.

23. One tenant in building 4077 has had his unit broken into three times since Defendants purchased the property in April. He has had to replace his own locks twice already, but because the building remains unsecured, his efforts are likely to continue to be fruitless.

24. Since April, DOB has issued repeated Notices of Infraction regarding these violations of the Housing and Property Maintenance Codes. Defendants refuse to remedy the problems.

Fire Safety Equipment Is Missing, Broken, or Expired

25. Defendants do not maintain basic fire safety equipment at Minnesota Commons.

26. During inspections on September 20 and October 6, 2023, which was before Defendants purchased and began managing the Property, OAG found missing, unmarked or

expired fire extinguishers in the common area of every building inspected. When OAG returned to Minnesota Commons on July 16, 2024, several months after Defendants purchased and began managing the Property, Defendants had not replaced the missing, broken, or expired fire extinguishers. That remains the case today.

27. At 4075 Minnesota Ave., NE, DOB issued four NOIs for missing, inoperable or expired fire safety equipment when it conducted an inspection on July 30, 2024.

Rodent and Pest Infestation Is Rampant

28. The deleterious conditions at Minnesota Commons create perfect conditions for extreme rodent and pest infestations. Tenants report that Defendants have not performed any extermination at the Property since Defendants purchased and began managing it. The continual accumulation of trash contributes to these infestations by providing rodents and pests an ever-replenishing food source.

29. Rodent burrows, rodent droppings, and pests are visible throughout the Property, and rodents and pests access the buildings at the Property through any number of open windows, doors, and other holes. The accumulated pet feces also attract rodents and pests.

30. On July 30, 2024, DOB also cited the Property for failure to exterminate these infestations.

Defendants Failed to Perform Any Routine Maintenance

31. Since purchasing Minnesota Commons, tenants report that Defendants have performed no routine maintenance on occupied units, leaving numerous Housing Code violations to persist unabated.

32. Rather than properly maintaining the occupied units, Defendants are illegally renovating the vacant units.

33. When OAG inspected the Property, they found damaged walls, ceilings, and floors and broken bathroom fixtures, stoves, and ovens in multiple occupied units. They also found missing counters and cabinets and damaged light fixtures.

34. This pattern of severe neglect extends to the common areas with damaged floors and stairs, evidence of unauthorized occupants in the hallways, broken light fixtures, unsecured mailboxes, and broken windows.

**Defendants Are Engaging in Illegal Construction,
Flagrantly Violating Repeated Stop Work Orders**

35. Almost immediately after the April 2024 purchase, Defendants began illegal construction at the Property, in violation of the District's Construction Code. The new construction has done nothing to address the unsafe, unsanitary conditions at the Property. The construction has been solely in unoccupied units, leaving the ongoing threats to health and safety in the occupied units and common areas to fester unaddressed.

36. Defendants are completely gutting the unoccupied units under construction. They knock down or strip to studs all walls. They completely remove all bathroom fixtures, including showers, sinks, and toilets. They empty all kitchen areas, removing all appliances, sinks, and cabinetry. They remove all windows, doors, and lighting.

37. This full-scale renovation of unoccupied units far exceeds the scope of the permits DOB issued to Defendants. On April 7, 2024, Defendant 4069-4089 Minnesota obtained twenty-one "postcard" permits. Postcard permits do not require the submission or approval of plans for the work being performed and are issued automatically upon payment of a fee. They authorize only the most minor construction projects, such as replacement of minor architectural elements, application of up to 5 gallons of fire-retardant paint, and erection of a single Christmas tree stand.

38. Defendants' postcard permits represent that they would only conduct "interior demolition of non-bearing elements in a space up to 5000 square feet; replacement of in kind interior wall coverings; and replacement of in kind windows."

39. On April 10, 2024, DOB received the first complaint of illegal construction. Between April 15 and August 2, 2024, DOB visited the Property nineteen times and found that the work Defendants were performing exceeded the permits obtained.

40. DOB took immediate administrative steps to halt the illegal construction. Between April 24 and July 26, DOB issued seven Stop Work Orders for the Property. DOB posted each SWO prominently on the relevant building.

41. The first four SWOs required Defendants to post their permits, comply with the terms of the SWO, and stop all work until the SWO requirements are met. DOB issued these SWOs on April 24, May 21, June 27, and July 16, 2024.

42. The fifth and sixth SWOs, issued on July 16, require Defendants to submit plans for DOB review and approval and to obtain the correct permits for the work being performed. These SWOs state that Defendants need permits for interior demolition, interior renovation, framing, excavation, new electrical work, and new plumbing work.

43. The most recent SWO, issued on July 26, require Defendants to comply with all prior SWOs.

44. On July 26, 2024, DOB served compliance checklists—a roadmap for getting the SWOs lifted—on multiple addresses for Defendants. The checklists instruct Defendants to do the following: post all permits; submit framing and excavation plans for DOB review and approval; obtain the proper permits for framing, excavation, plumbing, and electrical work; and obtain the proper permits for interior renovations and interior demolition.

45. To date, Defendants have not complied, and none of the SWOs have been lifted.

**Defendants Are Evading District Regulation and Misleading Tenants By
Operating Without Required Licenses**

46. Since purchasing the Property, Defendants have managed it without required licenses or certificates of occupancy, wholly evading District laws intended to ensure safe, habitable housing.

47. District law requires individual residential property managers to have a District-issued property management license and requires businesses that operate residential apartment houses to have a District-issued basic business license (“BBL”). District law also requires that any residential apartment house have a Certificate of Occupancy.

48. In January 2021, the District’s Department of Consumer and Regulatory Affairs (“DCRA”) revoked the basic business license held by Defendant Razjooyan’s company, Masterpiece Property Management, “[a]s a result of significant construction and housing violations, disregard for DCRA’s enforcement actions, and in the interest of protecting the safety of District residents.”

49. In the Notice sent to Defendant Razjooyan, DCRA further explained that:

Sam Razjooyan aka Ali Razjooayn, the sole governor of Masterpiece Property Management LLC, failed to obtain required permits, exceeded the scope of permits, and violated construction and housing codes in a manner endangering the life and safety of workers, tenants, and the general public, including citations for unlawful continuance as recently as January 14, 2021.

50. Despite this revocation, Defendant Razjooyan has continued to manage properties, including Minnesota Commons, through US Realty LLC, which does not have and has never had a BBL to operate a residential apartment house in the District.

51. Likewise, Defendant Razjooyan does not and has never had a property management license in the District. Neither do any known employees of US Realty.

52. Defendant 4069-4089 Minnesota does not have a BBL to operate a residential apartment complex in the District, and it has not applied for new Certificates of Occupancy after it acquired the Property, as required by DOB.

53. Despite having no BBL or property management license, Defendant US Realty was responsible for the management and upkeep of Minnesota Commons through August 9, 2024. Until then, it was completely derelict in its duties, failing to respond timely to tenant complaints regarding pressing health and safety issues.

54. On August 11, 2024, Defendants posted flyers at the Property indicating that Defendant Elite Residential has taken over management of the Property. Elite Residential's corporate status is listed as "Revoked" by the District's Department of Licensing and Consumer Protection, and it does not hold any licenses to do business in the District. To date, Elite Residential Services has not responded to any tenant attempts to contact them by phone or email, including for necessary maintenance and repairs.

55. Defendants demand and accept rent from tenants, representing that they have the required BBL, when they do not. Rather, they mislead tenants by leaving the BBL and Certificate of Occupancy held by the previous owner posted in the Property.

COUNT ONE
(Violations of the Consumer Protection Procedures Act)

56. The District realleges and incorporates by reference the allegations set forth in paragraphs 1 through 55 as if each allegation were separately restated here.

57. The Consumer Protection Procedures Act is a remedial statute that is to be construed broadly. It establishes an enforceable right to enjoin unfair or deceptive trade practices regarding consumer goods and services that are or would be purchased, leased, or received in the District.

58. 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 [unlawful trade] practice in violation of...D.C. Code § 28-3904.” *See id.* § 28-3909(a).

59. The CPPA prohibits “merchants” from engaging in unfair or deceptive trade practices in connection with the offer, sale, lease and supply of consumer goods and services.

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

61. Tenants at the Property are “consumers” under the CPPA because they rent their apartments for personal, household, or family purposes. *See id.* § 28-3901(a)(2).

62. Implied into every lease in the District of Columbia is a warranty of habitability, a promise by the landlord to maintain a tenant’s unit and the property in compliance with the Housing Code, Property Maintenance Code and Construction Code. 14 D.C.M.R. § 301.

63. Defendants are violating the implied warranty of habitability and engaging in unfair or deceptive trade practices under the CPPA by:

- a. representing to tenants affirmatively and/or through ambiguity, that the Property is safe and habitable and will be maintained in compliance with the District’s Housing Code and Property Maintenance Code when, in fact, the Property is not habitable and Defendants do not maintain the Property up to code, in violation of D.C. Code § 28-3904(a), (b), (e), and (f-1);
- b. failing to disclose to tenants that the Property is not safe and habitable and that Defendants would not maintain the Property in compliance with the Housing Code and Property Maintenance Code, in violation of D.C. Code § 28-3904(f);

- c. failing to disclose to tenants that Defendants have created, are creating and would create unsafe conditions by engaging in illegal, unpermitted, and uninspected construction at the Property, in violation of D.C. Code § 28-3904(f);
- d. representing to tenants that Defendants possess required licenses to do business and manage residential property in the District when, in fact, they do not, in violation of D.C. Code § 28-3904(a);
- e. failing to maintain the Property in accordance with the District Housing Code and Property Maintenance Code and failing to comply with the District Construction Code, in violation of D.C. Code § 28-3904(dd).

64. Each such act or practice constitutes a separate violation of the CPPA.

65. Defendants' unlawful acts and practices in violation of the CPPA harm District residents, including tenants of the Property and former tenants displaced from the Property.

66. Because Defendants' unlawful acts and practices present a continuing threat to the District and its residents, they affect the public interest.

67. Defendant Padilla is personally liable under the CPPA as he is the individual responsible for the day-to-day work being performed at Minnesota Commons. Upon information and belief, Defendant Padilla is responsible for hiring contractors, planning work, and responding to concerns at the Property during construction. Accordingly, Defendant Padilla participates in and is responsible for creating and implementing the alleged unfair and deceptive policies and trade practices described herein; directs or supervises employees who participate in the unfair and deceptive trade practices described herein; and knows or should know of the unfair and deceptive

trade practices described herein and has the power to stop them, but rather than stopping them, continues to utilize and advance them.

68. Defendant Razjooyan is personally liable under the CPPA for the illegal conduct in violation of the CPPA because he is personally responsible for and/or exercised his authority to control the policies and trade practices of Defendant US Realty. Defendant Razjooyan receives maintenance request emails sent to Defendant US Realty and responds to them directly from his personal email address. Defendant Razjooyan participates in and is responsible for creating and implementing the unfair and deceptive policies and trade practices described herein; directs or supervises employees who participate in the unfair and deceptive trade practices described herein; and knows or should know of the unfair and deceptive trade practices described herein and has the power to stop them, but rather than stopping them, continues to utilize and advance them.

COUNT TWO
(Petition for Appointment of a Receiver under the Tenant Receivership Act)

69. The District realleges and incorporates by reference the allegations set forth in paragraphs 1 through 55 as if each allegation were separately restated here.

70. Defendants are owners, agents, lessors, and/or managers of 4069-4089 Minnesota. D.C. Code §§ 42-3651.02(c)(1), 42-3651.05(f)(2).

71. The Attorney General may petition the Court to appoint a receiver over a rental housing accommodation “operated in a manner that demonstrates a pattern of neglect for the property for a period of 30 consecutive days and such neglect poses a serious threat to the health, safety, or security of the tenants.” D.C. Code § 42-3651.02(b).

72. A pattern of neglect exists where the “owner, agent, lessor, or manager of the rental housing accommodation has maintained the premises in a state of disrepair that constitutes a serious threat to the health, safety, or security of the tenants [... including] vermin or rat infestation;

filth or contamination; inadequate ventilation, illumination, sanitary, heating or life safety facilities; inoperative fire suppression or warning equipment; inoperative doors or window locks; or any other condition that constitutes a hazard to tenants, occupants or the public.” D.C. Code § 42-3651.02(c)(1)-(2).

73. Defendants operate Minnesota Commons in a manner that demonstrates a pattern of neglect under D.C. Code § 42-3651.02(b)-(c). The Property suffers from chronic and severe disrepair, including: pest and rodent infestations; mold, leaks, and water damage; broken doors and windows; cracked and damaged walls and ceilings; accumulation of trash and debris; and missing or defective fire safety equipment.

74. Defendants’ neglect of the Property poses a serious threat to the health, safety, and security of the tenants.

75. This pattern of neglect began when Defendants purchased the Property in April 2024 and has continued to the present—well beyond the statutory requirement of thirty (30) consecutive days. Defendants disregard numerous Stop Work Orders, Notices of Infraction, and inspection reports, failing to make needed repairs even when cited by District agencies. Tenants report that they are often unable to contact Defendants, experience long delays in Defendants’ response to requests for emergency maintenance and have received no routine maintenance since Defendants purchased the Property.

COUNT THREE
(Violations of the Construction Code)

76. The District realleges and incorporates by reference the allegations set forth in paragraphs 1 through 55 as if each allegation were separately restated here.

77. The Attorney General may bring suit for injunctive and monetary relief when any person or entity violates, has violated, or is about to violate the District's Construction Code. D.C. Code §§ 6-1406, 6-1407.

78. Injunctive relief shall be granted if it will prevent illegal construction activity, and it may be issued ex parte without bond. D.C. Code § 6-1407(a), (c).

79. Defendants violate the Construction Code, including by engaging in full scale renovation of unoccupied units that far exceeds the scope of their postcard permits and by repeatedly failing to comply with the terms of Stop Work Orders. 16 D.C.M.R. §3306, *et seq.*

80. These violations are ongoing, and an injunction is necessary to prevent further illegal construction.

RELIEF REQUESTED

WHEREFORE, Plaintiff, the District of Columbia, respectfully requests that the Court:

a. Permanently enjoin Defendants from violations of the CPPA, pursuant to D.C. Code § 28-3909(a);

b. Award such relief as the Court finds necessary to redress injuries resulting from Defendants' violations of the CPPA, including disgorging rent that Defendants have charged tenants and/or requiring Defendants to pay damages and restitution, pursuant to D.C. Code § 28-3909(b);

c. Order the payment of statutory civil penalties for each and every violation of the CPPA, pursuant to D.C. Code § 28-3909(b);

d. Appoint a receiver who has demonstrated to the Court the expertise to develop and supervise a viable abatement plan for the satisfactory rehabilitation of the Property, pursuant to D.C. Code § 42-3651.05;

e. Order that Defendants, jointly and severally, contribute funds in excess of the rents collected from the Property for the purposes of abating Housing Code, Property Maintenance Code, and Construction Code violations and assuring that any conditions that are a serious threat to the health, safety, or security of the occupants or the public are corrected, pursuant to D.C. Code § 42-3651.05(f);

f. Permanently enjoin Defendants from violations of the Construction Code, pursuant to D.C. Code § 6-1407(a), (c);

g. Order the payment of statutory civil penalties and fines for each and every violation of the Construction Code, pursuant to D.C. Code § 6-1406;

h. Award District the costs of this action and reasonable attorneys' fees, pursuant to D.C. Code §§ 28-3909(b); and

i. Grant such further relief as the Court deems just and proper.

Jury Demand

The District demands trial by a jury.

Dated: August 30, 2024

Respectfully submitted,

BRIAN L. SCHWALB
Attorney General for the District of Columbia

JENNIFER C. JONES
Deputy Attorney General
Public Advocacy Division

LAURA C. BECKERMAN
Acting Chief
Housing and Environmental Justice Section
Public Advocacy Division

/s/ Christopher Peña

MATTHEW MEYER [1045084]

CHRISTOPHER S. PEÑA [888324806]

EMILY S. RICHARD [979979]

Assistant Attorneys General

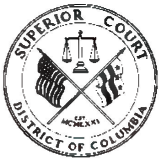
400 6th Street NW, 10th Floor

Washington, DC 20001

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(202) 705-1798

Attorneys for the District of Columbia



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.

2024-CAB-005590

Case Number _____

Ali Razjooyan

 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.

Christopher Peña

 Name of Plaintiff's Attorney

Office of Attorney General for the District of Columbia

Address

400 6th Street NW, 10th Floor, Washington, D.C. 20001

202-705-1798

Telephone

如需翻译, 请打电话 (202) 879-4828

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Clerk of the Court



By _____

Deputy Clerk

09/03/2024

Date _____

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

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

See reverse side for Spanish translation
 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

2024-CAB-005590

Número de Caso: _____

Ali Razjooyan

 Demandado

CITATORIO

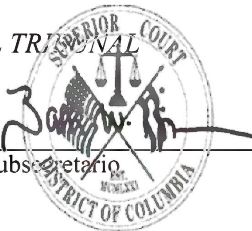
Al susodicho Demandado:

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.

Christopher Peña
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL



Office of Attorney General for the District of Columbia
 Dirección
400 6th Street NW, 10th Floor, Washington, D.C. 20001

Por: _____
 Subsecretario

09/03/2024

202-705-1798
 Teléfono

Fecha _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면 전화 (202) 879-4828 로 연락하십시오 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 pedir ayuda al respecto.

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



Superior Court of the District of Columbia
CIVIL DIVISION
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.

2024-CAB-005590

Case Number _____

Oscar Portillo Padilla

 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.

Christopher Peña

 Name of Plaintiff's Attorney

Office of Attorney General for the District of Columbia

Address

400 6th Street NW, 10th Floor, Washington, D.C. 20001

202-705-1798

Telephone

如需翻译, 请打电话 (202) 879-4828

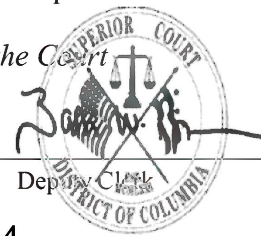
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Đề có một bản dịch, hãy gọi (202) 879-4828

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የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

Clerk of the Court



By _____

Deputy Clerk

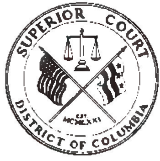
09/03/2024

Date _____

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See reverse side for Spanish translation
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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 _____

2024-CAB-005590

Número de Caso: _____

_____ Demandado
 Oscar Portillo Padilla

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.

Christopher Peña
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

 Subsecretario


Office of Attorney General for the District of Columbia
 Dirección
 400 6th Street NW, 10th Floor, Washington, D.C. 20001

Por: _____

202-705-1798
 Teléfono

Fecha 09/03/2024

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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.

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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.

2024-CAB-005590

Case Number _____

4069-4089 Minnesota Ave NE 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.

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Christopher Peña

Name of Plaintiff's Attorney

Office of Attorney General for the District of Columbia

Address

400 6th Street NW, 10th Floor, Washington, D.C. 20001

202-705-1798

Telephone

如需翻译, 请打电话 (202) 879-4828

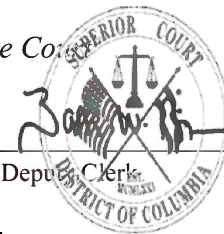
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Clerk of the Court



By _____

Deputy Clerk

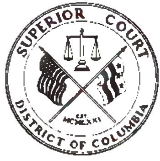
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Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

District of Columbia

contra Demandante

2024-CAB-005590

Número de Caso:

4069-4089 Minnesota Ave NE 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.

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Christopher Peña
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA

 Subsecretario

Office of Attorney General for the District of Columbia
 Dirección
 400 6th Street NW, 10th Floor, Washington, D.C. 20001

Por: _____

202-705-1798
 Teléfono

Fecha 09/03/2024

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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

 Plaintiff

vs.

2024-CAB-005590

Case Number _____

US Realty 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.

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Christopher Peña

 Name of Plaintiff's Attorney

Office of Attorney General for the District of Columbia

Address

400 6th Street NW, 10th Floor, Washington, D.C. 20001

202-705-1798

Telephone

如需翻译,请打电话 (202) 879-4828

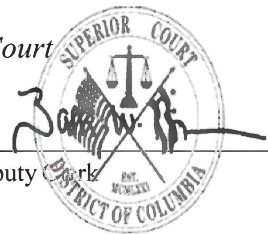
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Clerk of the Court



By _____

Deputy Clerk

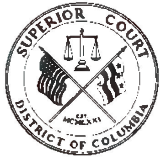
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Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

District of Columbia

Demandante

contra

2024-CAB-005590

Número de Caso:

US Realty LLC

Demandado

CITATORIO

Al susodicho Demandado:

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Christopher Peña

Nombre del abogado del Demandante

Office of Attorney General for the District of Columbia

Dirección

400 6th Street NW, 10th Floor, Washington, D.C. 20001

202-705-1798

Teléfono

如需翻译,请打电话 (202) 879-4828

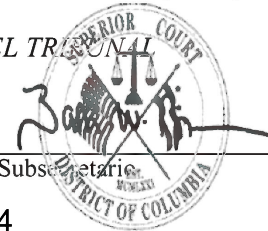
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SECRETARIO DEL TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA



Por:

Subsecretario

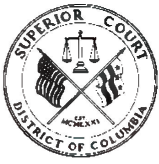
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Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

District of Columbia

Plaintiff

vs.

2024-CAB-005590

Case Number

Elite Residential Services 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.

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Christopher Peña

Name of Plaintiff's Attorney

Office of Attorney General for the District of Columbia

Address

400 6th Street NW, 10th Floor, Washington, D.C. 20001

202-705-1798

Telephone

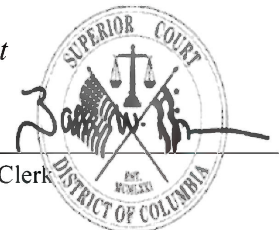
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Clerk of the Court



By

Deputy Clerk

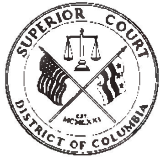
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District of Columbia

_____ Demandante
 contra

Número de Caso: 2024-CAB-005590

Elite Residential Services 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.

Christopher Peña
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA

 Subsecretario

Office of Attorney General for the District of Columbia
 Dirección
 400 6th Street NW, 10th Floor, Washington, D.C. 20001

Por: _____

202-705-1798
 Teléfono

09/03/2024
 Fecha

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면 전화 (202) 879-4828 로 연락하십시오 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



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Oscar Portillo Padilla
15105 Jennings LN
Bowie MD 20721

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To access your case information online, please visit www.dccourts.gov/services/cases-online.

Case Caption: District Of Columbia v. Oscar Portillo Padilla et al.

To: Oscar Portillo Padilla

Case Number: 2024-CAB-005590

NOTICE OF REMOTE INITIAL SCHEDULING CONFERENCE

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Meeting ID: 129 315 2924

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የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ለልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙ ለማድረግ መጠየቅ ይችላሉ። አስተርጓሚ ወይም የጽሑፍ ትርጉም ለመጠየቅ፣ እባክዎን በዚህ ደብዳቤ የመጀመሪያ ገጽ አናት ላይ በተቀመጠው ስልክ ቁጥር የፍርድ ቤቱን መዝገብ ቤት ቢሮን ያናጋግሩ። ለበለጠ መረጃ <https://www.dccourts.gov/language-access> ላይ ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።



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4069-4089 Minnesota Ave NE LLC
Attn Ace Corporate Services Inc
250 11th ST NE
Washington DC 20002

You are named in a lawsuit filed in the Superior Court of the District of Columbia. If you cannot appear at the hearing, please contact the Clerk's Office immediately for more information. If Plaintiff does not participate, the case may be dismissed. If Defendant does not participate, default or judgment may be entered.

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To access your case information online, please visit www.dccourts.gov/services/cases-online.

Case Caption: District Of Columbia v. Oscar Portillo Padilla et al.

To: 4069-4089 Minnesota Ave NE LLC

Case Number: 2024-CAB-005590

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US Realty LLC
Attn 1st Alliance Resources LLC
2300 N ST NW STE 300-RLK
Washington DC 20037

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To access your case information online, please visit www.dccourts.gov/services/cases-online.

Case Caption: District Of Columbia v. Oscar Portillo Padilla et al.

To: US Realty LLC

Case Number: 2024-CAB-005590

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የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።



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Elite Residential Services LLC
Attn Lounia Fowler
169 Mississippi AVE SE STE B
Washington DC 20032

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Case Caption: District Of Columbia v. Oscar Portillo Padilla et al.

To: Elite Residential Services LLC

Case Number: 2024-CAB-005590

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የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ለልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙ ለማድረግ መጠየቅ ይችላሉ። አስተርጓሚ ወይም የጽሑፍ ትርጉም ለመጠየቅ፣ እባክዎን በዚህ ደብዳቤ የመጀመሪያ ገጽ አናት ላይ በተቀመጠው ስልክ ቁጥር የፍርድ ቤቱን መዝገብ ቤት ቢሮን ያናጋግሩ። ለበለጠ መረጃ <https://www.dccourts.gov/language-access> ላይ ይጎብኙ።

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Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

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Permit No. 1726

Ali Razjooyan
115 Bytham Ridge LN
Potomac MD 20854

You are named in a lawsuit filed in the Superior Court of the District of Columbia. If you cannot appear at the hearing, please contact the Clerk's Office immediately for more information. If Plaintiff does not participate, the case may be dismissed. If Defendant does not participate, default or judgment may be entered.

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Case Caption: District Of Columbia v. Oscar Portillo Padilla et al.

To: Ali Razjooyan

Case Number: 2024-CAB-005590

NOTICE OF REMOTE INITIAL SCHEDULING CONFERENCE

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Meeting ID: 129 315 2924

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Christopher S Pena
Assistant Attorney General
400 6th Street NW 10th Floor
WASHINGTON DC 20001

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