

**DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT
441 4TH STREET, N.W., 2ND FLOOR S
WASHINGTON, D.C. 20002**

Appeal of Senior Dwelling, Inc.

BZA Appeal No. 18820

WITNESS LIST

Senior Dwelling, Inc. supplements its witness list based on additional information, by adding witnesses at Paragraph 6 and 7 below, as follows:

1. Rosemary Ogbenna – Ms. Ogbenna is expected to testify that she runs 223 and 225 as rooming houses, and not CRFs or Assisted Living Facilities. Ms. Ogbenna is also expected to testify as to the frequency of visits from DC Government officials inspecting 223 and 225 and interviewing her residents, often without a notice of violation or a basis for the visit. Ms. Ogbenna is expected to testify that she has always cooperated with these visits and inspections, despite whether she believed there was a basis, and has always promptly corrected any violations.
2. Mercy Udeh – Ms. Udeh is expected to testify that she is a resident at Senior Dwelling and is not, and never was, employed by Senior Dwelling in any capacity. Ms. Udeh has lived at Senior Dwelling for many years and has gotten to know some of the other residents. As a rooming house, residents share a kitchen, and often, when Ms. Udeh cooks for herself, she shares food with some of the other residents. Ms. Udeh is never paid or told to do this, she

does so out voluntarily, because she knows the residents. Ms. Uden is expected to testify that she has never dispensed medications or been the recipient of resident's funds.

3. Sheldon Faison – Mr. Faison is expected to testify that 223 and 225 are in compliance with all applicable building codes, and were in compliance when various DC Government officials were issuing notices of violations to Ms. Ogbenna for the properties.

4. Thomas Smoot – Mr. Smoot is expected to testify about the inspections of 223 and 225 that he was involved in, including procedures and protocols for DCRA inspections.

5. Kevin Meredith – Mr. Meredith is expected to testify about the inspections of 223 and 225 that he was involved in, including procedures and protocols for DCRA inspections.

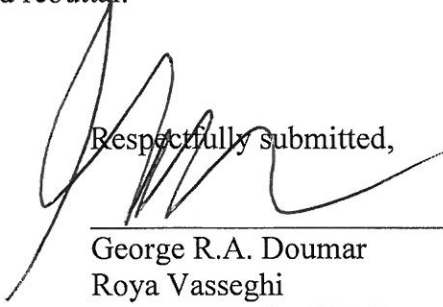
6. April Brent – Ms. Brent is a social worker who often referred potential residents to Senior Dwelling. Ms. Brent is expected to testify that she knew 223 and 225 were rooming homes, and that the potential residents she referred were capable of living independently.

7. Ryan Byrd – Mr. Byrd is a social worker who often referred potential residents to Senior Dwelling. Mr. Byrd is expected to testify that he knew 223 and 225 were rooming homes, and that the potential residents he referred were capable of living independently, and that D.C. officials contacted him to dissuade him from placing residents with Senior Dwelling, Inc.

Senior Dwelling, Inc. reserves the right to call any witnesses that the District of Columbia might use, and witnesses for impeachment and rebuttal.

DATED: September 12, 2014

Respectfully submitted,



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