

DISTRICT OF COLUMBIA GOVERNMENT  
OFFICE OF THE SURVEYOR

Washington, D.C., February 16, 2023

Plat for Building Permit of :

SQUARE 238 LOT 852

Scale: 1 inch = 20 feet

Recorded in Book A & T Page 1152

Receipt No. 23-02283

Drawn by: A.S.

Furnished to: JULIAN HUNT

"I hereby certify that the dimensions and configuration of the lot(s) hereon depicted are consistent with the records of the Office of the Surveyor unless otherwise noted, but may not reflect actual field measurements. The dimensions and configuration of A&T lots are provided by the Office of Tax and Revenue and may not necessarily agree with the deed description(s)."

*Anup Shresthaa*

For Surveyor, D.C.

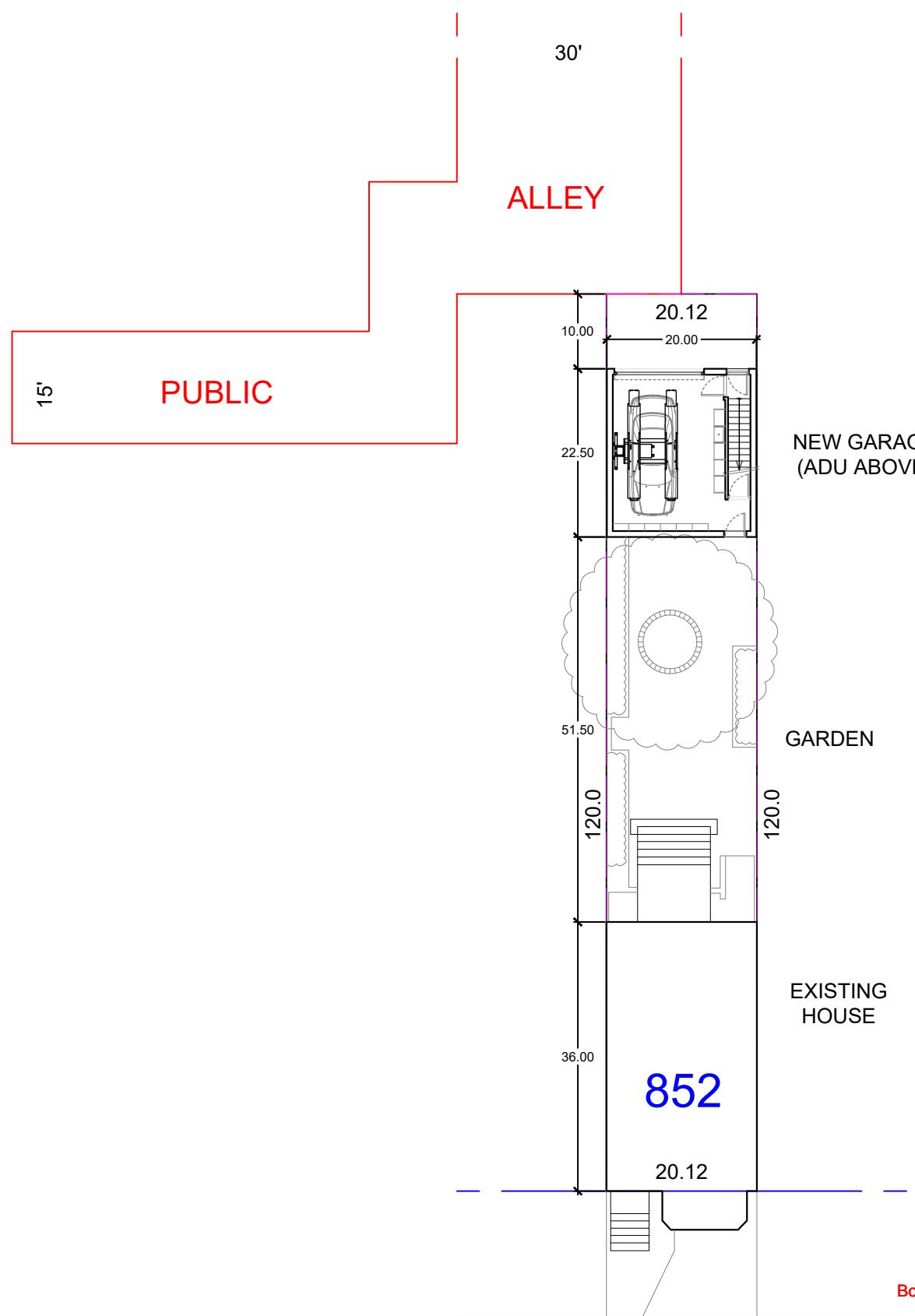


0 10 30 60 100

SCALE: 1:20

EXHIBIT A

SQUARE 238



## EXHIBIT B



# EXHIBIT C

## PLAT AND PLANS OF CONDOMINIUM SUBDIVISION 1812 13<sup>TH</sup> STREET CONDOMINIUM LOT 76 SQUARE 238 # 1812 13<sup>TH</sup> STREET, N.W.

CONDOMINIUM BOOK 19 PAGE 110  
RECORDED TIME 9:35AM  
RECORDED DATE MARCH 31, 2004  
SURVEY RECORDED ON ANNEX  
PLATS TO

IN ACCORDANCE WITH THE CONDOMINIUM ACT OF 1976, D.C.LAW 1-89, AS AMENDED, THE UNDERSIGNED OWNER OF LOT 76 IN SQUARE 238 AS RECORDED IN BOOK 13 PAGE 200 IN THE OFFICE OF THE SURVEYOR OF THE DISTRICT OF COLUMBIA, HEREBY SUBDIVIDES THE BUILDING SHOWN HEREON INTO 2 CONDOMINIUM UNITS WITH CERTAIN GENERAL AND LIMITED COMMON ELEMENTS AS MORE FULLY SET FORTH IN THE DECLARATION AND BY-LAWS OF THE PROJECT RECORDED IN THE OFFICE OF THE RECORDER OF DEEDS OF THE DISTRICT OF COLUMBIA IN INSTRUMENT NUMBER 2004024578 AND NUMBER 2004024579 ON 2/23/04.

THE UNDERSIGNED OWNER FURTHER REQUESTS THAT THE CONDOMINIUM PROJECT AS SHOWN ON THE ATTACHED PLAT CONSISTING OF 3 SHEETS BE ACCEPTED FOR RECORDATION IN THE OFFICE OF THE SURVEYOR OF THE DISTRICT OF COLUMBIA.

THE UNDERSIGNED OWNER BEING FIRST DULY SURNED, CERTIFIES, DEPOSES AND SAYS THAT **THEY ARE** THE OWNERS IN FEE SIMPLE OF THE ABOVE MENTIONED PROPERTY INCLUDING IMPROVEMENTS, AND THAT NO OTHER PERSON OR PERSONS OTHER THAN THE UNDERSIGNED HAVE ANY INTEREST OR CLAIM THEREIN EXCEPT FOR EXISTING TRUSTS NOTED BELOW; THAT THE UNDERSIGNED IS IN PEACEFUL OCCUPATION THEREOF, THAT THERE ARE NO SUITS OR ACTIONS PENDING AFFECTING THE TITLE TO SAID PROPERTY, INCLUDING THE IMPROVEMENTS AND THAT THERE ARE NO TRUSTS ON SAID PROPERTY, THAT THE USES OF THE INDIVIDUAL UNITS CONFORMS TO THE APPLICABLE LAWS AND REGULATIONS OF THE DISTRICT OF COLUMBIA

WITNESS OUR HANDS AND SEALS THIS 19 DAY OF FEBRUARY 2004.

OWNER: JEROME A. YOUNG and CERA C. LEACOCK

BY: Jerome A. Young **J**  
JEROME A. YOUNG, Joint Owner.

BY: Cera C. Leacock **J**  
CERA C. LEACOCK, Joint Owner.

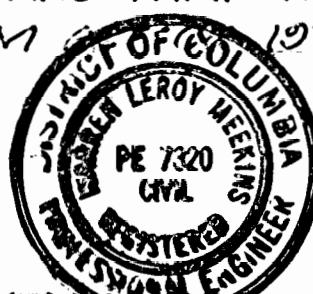
SUBSCRIBED AND SURNED BEFORE ME THIS 19 DAY OF FEBRUARY, 2004.

David S. Jenkins  
Notary Public, District of Columbia  
My Commission Expires 06-14-2005

NOTARY PUBLIC  
MY COMMISSION EXPIRES ON 5/14/2004, 20

### PROFESSIONAL ENGINEERS CERTIFICATION

I HEREBY CERTIFY THAT THIS PLAT AND PLANS REPRESENTS A FIELD SURVEY MADE UNDER MY DIRECTION, OF THE CONDOMINIUM UNITS AND THAT THE METES AND BOUNDS SHOWN HEREON ARE IN CONFORMANCE WITH THE RECORDS OF THE OFFICE OF THE SURVEYOR OF THE DISTRICT OF COLUMBIA AND THAT ALL UNITS MENTIONED ABOVE HAVE BEEN SUBSTANTIALLY COMPLETED AND THAT THE PLAT AND PLANS OF CONDOMINIUM SUBDIVISION COMPLY WITH THE PROVISIONS OF THE CONDOMINIUM ACT OF 1976, D.C. LAW 1-89, AS AMENDED.



Feb. 18, 2004  
DATE

Warren L. Meekins  
WARREN L. MEEKINS  
PROFESSIONAL ENGINEER #7320

### CERTIFICATION OF OFFICE OF TAX AND REVENUE

OFFICE OF TAX AND REVENUE 2/25/2004  
OWNERSHIP CORRECT ACCORDING TO  
RECORDS OF THIS OFFICE 2/25/04 18  
GENERAL TAXES PAID TO 3/31/04 18  
NO UNPAID ARREARS 2/25/04 18  
NO UNPAID SPECIAL ASSESSMENTS 2/25/04 18

Frank C. Callus  
ASSESSMENTS ADMINISTRATION

ATTEST: I ACKNOWLEDGE THAT THIS IS NOT A  
TAX CERTIFICATION AS INTENDED  
BY D.C. CODE SECTION 47-405  
FOR: OWNER Frank C. Callus

SURVEY, PLAT AND PLANS BY:

**W.L. MEEKINS, INC.**

REGISTERED LAND SURVEYOR # 2134

3101 RITCHIE ROAD

FORESTVILLE, MARYLAND 20747

301-738-6387/5328/7115/5324 (fax)

### CERTIFICATION OF DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS

DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS

3-12-, 2004

I HEREBY CERTIFY THAT THIS SUBDIVISION COMPLIES WITH THE ZONING REGULATIONS OF THE DISTRICT OF COLUMBIA

ZONING: ARTS/C-3-A

John D. Hobble  
ZONING ADMINISTRATOR

### CERTIFICATION OF OFFICE OF THE SURVEYOR

OFFICE OF THE SURVEYOR, D.C.

March 30, 2004

THIS PLAT AND PLANS ARE ACCEPTED FOR RECORDATION IN ACCORDANCE WITH THE CONDOMINIUM ACT OF 1976 TECHNICAL AND CLARIFYING AMENDMENT ACT OF 1992 D.C. LAW 9-82

Robert F. Quick Jr.  
SURVEYOR, D.C.

SHEET 1 OF 3

# **EXHIBIT C**

PLAT OF CONDOMINIUM SUBDIVISION

CONDOMINIUM BOOK 5 PAGE 16  
SURVEY RECORDED ON ANNEX  
PLATS        TO

1812 13<sup>TH</sup> STREET CONDOMINIUM  
LOT 76 SQUARE 238  
# 1812 13<sup>TH</sup> STREET

LOT 76 SQUARE 238

# 1812 13<sup>TH</sup> STREET

## 22 OCT 1962

All unit dimensions shown were measured to finished floors, walls and ceilings.  
Elevations shown based D.C. Department of Public Works datum.

← BENCH MARK ←

TOP SOUTHWEST CORNER 1ST STEP AT SOUTHWEST  
CORNER OF TELEPHONE COMPANY BUILDING,  
NORTHWEST CORNER OF 14TH AND R STREET, N.W.  
FIELD BOOK #4502, MAP NO. 6-22 ELEVATION =  
100.30 PER D.C. DEPARTMENT OF PUBLIC  
WORKS DATUM.

## ~ SYMBOLS / LEGEND ~

C/W & C/S Concrete Walk & Concrete Slab  
 C/ST. & Concrete Steps  
 -x-x-x Fence Lines  
 BRK. Steps BRICK STEPS

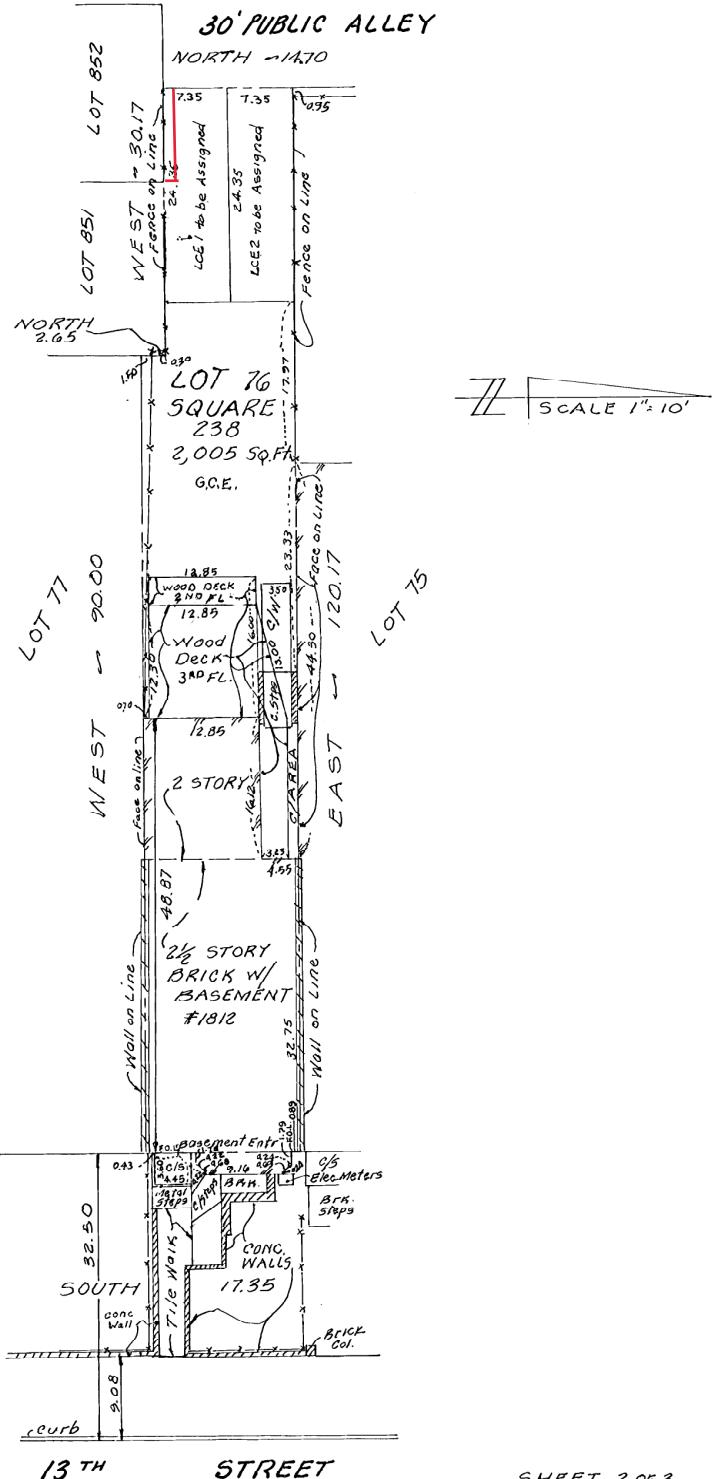
G.C.E. General Common Element  
 L.C.E. Limited Common Element  
 F.L.E.L. Floor Elevation  
 C.E.L. Ceiling Elevation

— Entrance Door  
St. & S.L. stairs & SKY Light  
HVAC Heating & Air-Conditioning Unit  
F.P. Fire Place

SURVEY, PLAT & PLANS BY:

W. L. MEEKINS, INC.

301-7366387 OR 5366  
OR 7115  
SCALE 1" = 10'



SHEET 2 OF 3

# EXHIBIT D

S. Hayes Edwards Jr., Esq.  
(301) 841-0191  
[hedwards@lerchearly.com](mailto:hedwards@lerchearly.com)

December 19, 2024

*Via Fed-Ex Overnight Delivery  
and by Email to [eanderson515@msn.com](mailto:eanderson515@msn.com)*

Mr. Rick Anderson  
Anderson DC Holdings, LLC  
3210 SE Corporate Woods Drive  
Ankeny, Iowa 50021-7405

## DEMAND TO CEASE AND DESIST

Re: 1812 13<sup>th</sup> Street N.W., Washington, DC

Dear Mr. Anderson:

Please be advised this law firm represents Robyn Epstein and Alexis Sainz, the owners of 1812 13<sup>th</sup> Street N.W. (the “1812 Premises”). If you have legal counsel with regard to this matter, please forward this letter to them for prompt review and response. Should you proceed without counsel, kindly direct all future correspondence regarding this matter to my attention.

My clients understand that your company owns the residential real property known as 1311 S Street N.W. (the “1311 Premises”). I am writing to you because we have observed metal rods and bricks placed by you, or those acting on your behalf, at a right angle inside of the 1812 Premises’ rear parking area. That entire parking area, including the portion you have encroached upon, is reflected on public records as being part of the 1812 Premises, and if there is any ambiguity about that, the parking area has been continuously and exclusively used by the 1812 Premises for at least twenty (20) years. Please be advised that those metal rods and bricks represent an unlawful trespass. This letter shall serve as your formal notice to please immediately remove those encroachments, and cease and desist from any further trespassing on that parking area or any other portion of the 1812 Premises.

We have also reviewed public records regarding your plans to raze the existing garage in the rear of the 1311 Premises and construct a new garage/carriage house with ADU, which seems to be using the line demarcated by those encroaching bricks as the boundary line from which a 10-foot setback of the new garage has been calculated. In order to protect their property interests, my clients would likely need to submit an appeal to the Board of Zoning Adjustments by December 30, 2024, unless we can quickly reach an amicable resolution.

As you might know, my clients rent the 1812 Premises to residential tenants. We expect that any work at or around the 1311 Premises will not interfere with our tenant’s regular use of the parking area, or any other part of the 1812 Premises, and that there will not be any other unnecessary interference. As longtime residents of D.C., my clients understand that development is part of city life, and they look forward to good faith cooperation by all parties.

# EXHIBIT D

Please contact me, or have your counsel contact me, at your very earliest convenience so that we might avoid the expense and burden of adversarial proceedings. My clients are hopeful that this matter can be resolved in a mutually beneficial and economic manner.

Sincerely,



Hayes Edwards

cc: Ms. Robyn Epstein