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March 23, 2026

Board of Zoning Adjustment
c/o Office of Zoning
441 4th Street, NW, Suite 200-S
Washington, DC 20001

STATEMENT OF COMPLIANCE WITH BURDEN OF PROOF

BZA Case No. FY-25-9-Z (REVISED)

3207 6th Street NW, Washington, DC | Square 3046, Lot 0808 | RF-1 Zone

DOB Permit No. B2508573

Pursuant to the BZA Referral Memorandum dated March 4, 2026

I. REQUESTED ZONING RELIEF

Pursuant to the Revised BZA Referral Memorandum issued by the Office of Zoning Administration on **March 4, 2026** (FY-25-9-Z REVISED - 2 RJW, Kathleen Beeton, Zoning Administrator), the applicant seeks the following zoning relief in connection with the proposed subdivision of Square 3046, Lot 0808, and the construction of two row dwellings at 3207 6th Street NW:

No.	Type of Relief	Zoning Sections	Basis
1	Area Variance	C § 306.1(a),(b) X § 1000.1	Alley width 10 ft vs. 24 ft required (deviation: 14 ft). Applies to both lots.
2	Special Exception	E § 5100.1(d) E § 5201.3(a) X § 901.2	Side yard 0 ft vs. 5 ft required from abutting non-alley lot. North lot only.
3	Special Exception	U § 600.1(f)(4) U § 601.1(f) X § 901.2	Residential use on alley not meeting minimum alley width requirement. Both lots.

Important note on scope: The January 2026 iteration of this application included an area variance for lot area under Subtitle C § 306.1(c), premised on a 3,000 square foot minimum. That relief is **no longer required**. As confirmed by the February 27, 2026 Notes and Computations sheets (Reviewer: Ramon Washington), the RF-1 zone requires a minimum lot area of 1,800 square feet for alley record lots, and both the proposed north lot (1,850 sq ft) and south lot (1,813 sq ft) satisfy this requirement as a matter of right. The current submission addresses only the three items identified in the March 4, 2026 BZA Referral Memorandum.

II. PROPERTY DESCRIPTION AND PROPOSED DEVELOPMENT

The subject property is an alley tax lot located in the interior of Square 3046 in the Petworth/Park View neighborhood of Northwest Washington. The lot contains approximately **3,664 square feet** of gross area and is accessed exclusively from a public alley with an existing improved width of **ten (10) feet**. The property has no frontage on a public street. The lot is situated within the **RF-1 (Residential Flat)** zoning district and has been vacant for an extended period.

The applicant proposes to subdivide the existing alley tax lot into two separate alley record lots and to construct one **row dwelling** on each lot. The proposed development is summarized as follows:

South Lot (Lot 0808 — south of plat):

- Lot area: 1,813 sq ft (minimum required: 1,800 sq ft — COMPLIANT)
- Lot width: 24 ft (minimum required: 18 ft — COMPLIANT)
- Building area: 1,320 sq ft (maximum permitted: 1,632 sq ft — COMPLIANT)
- Lot occupancy: 72.8% (maximum permitted: 90% — COMPLIANT)
- Height: 2 stories + cellar, 19.91 ft (maximum: 20 ft — COMPLIANT)
- Alley frontage: 23 ft (minimum required: 14 ft — COMPLIANT)
- Rear yard from alley centerline: 14.5 ft (minimum: 7.5 ft — COMPLIANT)
- Pervious surface: 45% (minimum: 10% — COMPLIANT)
- Vehicle parking: 1 space (minimum: 1 — COMPLIANT)
- Side yard from non-alley lot: N/A — no adjacent non-alley lot on subject side

North Lot (Lot 0808 — north of plat):

- Lot area: 1,850 sq ft (minimum required: 1,800 sq ft — COMPLIANT)
- Lot width: 19 ft (minimum required: 18 ft — COMPLIANT)
- Building area: 1,048 sq ft (maximum permitted: 1,665 sq ft — COMPLIANT)
- Lot occupancy: 62% (maximum permitted: 90% — COMPLIANT)
- Height: 2 stories + cellar, 19.91 ft (maximum: 20 ft — COMPLIANT)
- Alley frontage: 20 ft (minimum required: 14 ft — COMPLIANT)
- Rear yard from alley centerline: 33 ft (minimum: 7.5 ft — COMPLIANT)

- Pervious surface: 30% (minimum: 10% — COMPLIANT)
- Vehicle parking: 1 space (minimum: 1 — COMPLIANT)
- Side yard from non-alley lot (left side): 0 ft (required: 5 ft) — SPECIAL EXCEPTION REQUIRED

With the exception of the alley width (a condition of the existing public right-of-way, not the lot) and the north lot side yard, **every applicable development standard is satisfied**. The proposed row dwellings are modest in scale, consistent with the residential character of the surrounding RF-1 neighborhood, and will provide two units of quality infill housing on a property that has remained vacant and undeveloped.

III. AREA VARIANCE — ALLEY WIDTH (SUBTITLE C § 306.1(A), (B); SUBTITLE X § 1000.1)

Subtitle C § 306.1(a) requires that a new Alley Record Lot have frontage along a public alley with a minimum width of twenty-four (24) feet. Section 306.1(b) requires that access to a public street be provided through an alley or alleys with a minimum width of twenty-four (24) feet at all points between the new lot and the street. The existing alley serving this property has an improved width of **ten (10) feet**, resulting in a deviation of **fourteen (14) feet**. This variance is required for both the north and south lots. The standards governing area variance relief are set forth in Subtitle X § 1000.1.

A. Exceptional Condition of the Property (X § 1000.1(a))

The subject property presents exceptional physical conditions that are unique to its situation within Square 3046 and that were not created by the applicant. The alley tax lot at 3207 6th Street NW occupies the interior of a dense urban block. Its configuration, dimensions, and access are entirely determined by the existing alley right-of-way — a public infrastructure feature established decades ago under prior zoning regimes and physical conditions that predate the current owner's acquisition of the property.

The ten-foot alley width is not a choice made by the applicant; it is the fixed, physical width of the public right-of-way as it exists and has existed. The applicant has no authority to widen a public alley. No action by the applicant — no matter how careful the site design — can remedy this condition. It is, in the fullest sense of the term, an exceptional and extraordinary physical limitation inherent to the property itself. Subtitle X § 1000.1(a) was written precisely to address situations like this, where a property's physical circumstances make strict compliance physically impossible rather than merely inconvenient.

The BZA has long recognized that alley lot properties throughout the District present inherent constraints — irregular dimensions, limited access, constrained widths — that arise from the historic pattern of alley development in Washington neighborhoods. This property's situation is not the product of overcrowding a lot or poor planning; it is the product of existing urban infrastructure. The conditions are exceptional within the meaning of the Zoning Regulations.

B. Practical Difficulty (X § 1000.1(a))

Strict application of the 24-foot minimum alley width requirement would render this property **absolutely and permanently undevelopable**. Because the existing alley width is fixed public infrastructure, it cannot be changed to meet the regulatory minimum. There is no engineering solution, no redesign of the proposed buildings, and no modification to the lot configuration that would change the width of the public alley. If the variance is denied, the property remains vacant in perpetuity — not because the owner lacks the means or desire to develop it, but because the Zoning Regulations, as written, impose a requirement that is physically impossible to satisfy.

This is the paradigmatic case for variance relief. The practical difficulty is not a matter of economics or preference; it is a matter of physical impossibility. A property that cannot be developed under any scenario — where no redesign, no reconfiguration, and no investment can achieve compliance — exemplifies the kind of exceptional hardship that area variance relief under Subtitle X § 1000.1 is designed to address.

The requested variance asks only that the Board acknowledge the existing physical reality of the alley right-of-way. The proposed row dwellings are otherwise fully compliant and modestly scaled. The variance represents the **minimum relief necessary** to allow any beneficial use of this property at all.

C. No Substantial Detriment to the Public Good or Zoning Plan (X § 1000.1(b))

Granting the requested area variance will not cause substantial detriment to the public good, nor will it substantially impair the intent, purpose, or integrity of the Zoning Regulations or the Zoning Map.

The purpose of the minimum alley width requirement is to ensure safe and adequate access for residents, service vehicles, and emergency response. On the specific facts of this application, the Board can find that granting the variance satisfies, rather than undermines, that purpose, for the following reasons:

- The existing ten-foot alley already serves the block. It is not a proposed or theoretical alley; it is an established, improved public right-of-way that currently provides access to this block. Adding two modest row dwellings with a combined footprint of approximately 2,368 square feet does not meaningfully change the functional character of this alley.
- FEMS has stated it will evaluate specific alleys on a case-by-case basis. The Fire and Emergency Medical Services Department's response in ZC Case No. 25-06 explicitly confirmed that it "support[s] the existing special exception process for reviewing residential uses on alleys that do not meet the matter of right standard" and that it evaluates requests "on a case-by-case basis" considering specific site conditions. The Board should grant this variance with full confidence that FEMS will conduct the case-specific safety analysis it has committed to performing.
- The Zoning Administrator has already found this alley network adequate for residential use. In September 2014, the Zoning Administrator of the District of Columbia issued a formal determination letter confirming that "no zoning restrictions prevent [the applicant] from establishing primary entry to some of the units off the public alleyway" in connection with a six-unit apartment building also located in Square 3046. This

determination involved the same alley network that serves the subject property. Two row dwellings are a materially less intensive use than six apartment units.

- The proposed development complies with all other applicable development standards — height, lot occupancy, setbacks, parking, and pervious surface. The buildings will not create shadows, overlooking, noise, or service access issues that would detrimentally affect neighboring properties.
- The Zoning Commission's pending text amendment (ZC Case No. 25-06) affirmatively contemplates that subdivisions on alleys not meeting the 24-foot minimum may proceed through the special exception process. That pending amendment reflects the Commission's determination that the public interest is served — not harmed — by enabling carefully reviewed residential development on alley lots like this one. Granting this variance is prospectively consistent with that determination.

IV. SPECIAL EXCEPTION — SIDE YARD REQUIREMENT (SUBTITLE E § 5100.1(D), § 5201.3(A); SUBTITLE X § 901.2)

Subtitle E § 5100.1(d) and § 5201.3(a) require a minimum side yard of five (5) feet from any lot line that abuts a non-alley lot. This requirement applies to the **north lot only**. The proposed row dwelling on the north lot provides zero (0) feet on its left side (relative to building front), where the lot line adjoins an abutting non-alley lot, resulting in a deviation of five (5) feet. Special exception relief under Subtitle X § 901.2 is required.

A. Harmony with the General Purpose and Intent of the Zoning Regulations (X § 901.2(a))

The general purpose of the side yard requirement is to provide light, air, and a physical buffer between adjacent buildings — ensuring adequate separation between structures on separate lots and reducing the risk of fire spread between buildings. This application is fully consistent with that purpose.

The proposed north lot row dwelling is designed as a **row dwelling** — a building type that by definition shares a party wall with adjacent structures. Row dwellings are not detached single-family homes and are not expected to have side yards in the conventional sense; they achieve compatibility with adjacent buildings through shared wall construction, which provides equal or superior fire separation and does not compromise light or air to neighboring structures in the same manner as a detached building at a zero setback. In the RF-1 zone — a zone that explicitly contemplates flat development and row dwelling configurations — zero side yards are a standard and expected building condition.

The Zoning Regulations recognize that alley lot development has special characteristics. The pending text amendment in ZC Case No. 25-06, as proposed in the OP Post-Hearing Report of March 2, 2026, would revise yard requirements for alley lots in the RF zone to provide reduced minimum yards, acknowledging that the low-scale, interior-block character of alley lot development does not require the same separation distances as street-facing lots. Granting the

side yard special exception here is consistent with the trajectory and intent of the Zoning Regulations as they are being actively updated.

B. No Adverse Effect on Neighboring Properties (X § 901.2(b))

The side yard special exception for the north lot will not adversely affect the neighboring property that abuts the relevant lot line. Several key facts support this conclusion:

- Party wall construction, which is the standard for row dwellings in the District, provides structural separation and fire-rated assembly equivalent to or greater than a five-foot open side yard with respect to fire safety. The zero side yard does not create a meaningful additional risk compared to a conforming row dwelling party wall condition.
- The north lot building is modest in scale — two stories plus cellar, with a height of 19.91 feet and a building area of only 1,048 square feet. The proposed structure will not loom over or shadow adjacent properties in a manner disproportionate to the building type and zone.
- The rear yard from the alley centerline on the north lot is 33 feet — more than four times the required 7.5 feet. This generous rear setback provides substantial open space and ensures the development is not oppressively dense within the lot.
- The neighboring property on the abutting non-alley side is a street-facing lot with its own building orientation, setbacks, and open space. The proposed row dwelling on the north alley lot does not materially alter the light, air, or privacy conditions experienced from that property.
- There is no evidence that the zero side yard will generate noise, service access problems, or any other operational impact that would adversely affect neighboring properties.

V. SPECIAL EXCEPTION — RESIDENTIAL USE ON SUBSTANDARD ALLEY (SUBTITLE U § 600.1(F)(4), § 601.1(F); SUBTITLE X § 901.2)

Subtitle U § 600.1(f) identifies residential use of alley lots as a matter of right subject to meeting the minimum alley width requirements. Subtitle U § 601.1(f) establishes the special exception pathway for residential uses on alley lots that do not meet those minimum width requirements. Because the existing alley width of ten (10) feet is less than the required twenty-four (24) feet, special exception approval is required for residential use on both the north and south lots. The applicable standard is Subtitle X § 901.2.

A. Harmony with the General Purpose and Intent of the Zoning Regulations (X § 901.2(a))

The proposed residential use of these alley lots is in harmony with the general purpose and intent of the Zoning Regulations and the Zoning Map on several independent grounds.

First, residential use is the explicitly contemplated use for these lots. The subject property is located in the RF-1 (Residential Flat) zone, which is a low-density residential district. The Zoning Regulations make residential use a matter of right on alley lots in the RF-1 zone subject to meeting the alley width standard — meaning the regulations affirmatively contemplate and encourage residential alley lot development in this zone. The special exception is not a deviation from the zone's purpose; it is the regulatory mechanism designed to allow that purpose to be achieved when the alley width standard cannot be met due to physical constraints outside the applicant's control.

Second, the Zoning Commission has affirmatively committed to this policy direction. ZC Case No. 25-06, for which the Office of Planning issued a post-hearing report recommending approval on March 2, 2026, proposes to streamline and clarify the standards governing residential use on alley lots. The proposed text amendments to Subtitle U § 601.1(f)(1)-(3) would revise and simplify the criteria for this exact special exception, with the explicit goal of facilitating residential alley lot development throughout the District. The Office of the Attorney General of the District of Columbia, Special Counsel for Equitable Land Use, expressly stated in her February 25, 2026 letter to OP that the revised amendment "will facilitate development of alley lots throughout the District with critically needed residential units, while ensuring compatibility with the surrounding neighborhoods." The Board's grant of special exception relief here is consistent with — and anticipatory of — that affirmative policy determination.

Third, the District's housing goals affirmatively support this application. The District of Columbia faces a well-documented housing shortage. Alley lots represent an underutilized resource for infill housing that can add residential units without displacing existing uses, disrupting established street frontages, or requiring large-scale land assembly. The Comprehensive Plan's policies on infill development, efficient land use, and innovative approaches to housing strongly support the proposed use. The Office of Planning's post-hearing report in ZC Case No. 25-06 identified these goals as primary drivers of the text amendment, noting that a key purpose of the alley lot regulations is to "facilitate the use of vacant or underutilized alley lots where current regulations render use or development of the properties infeasible."

Fourth, this specific alley network has already been found adequate for residential primary access. In September 2014, Zoning Administrator Matthew Le Grant issued a formal determination confirming that *"no zoning restrictions prevent [the applicant] from establishing primary entry to some of the units off the public alleyway"* in connection with a six-unit apartment building located in Square 3046 at 524-526 Lamont Street NW — properties located in the **same square and served by the same alley network** as the subject property. The Zoning Administrator's determination constitutes an official finding that the alley network serving Square 3046 is compatible with residential primary access. The applicant here proposes only two single-family row dwellings — a **substantially less intensive use** than six apartment units — accessing the same alley network. If six apartment units were found compatible with residential access on this alley, two row dwellings manifestly satisfy the same standard.

B. No Adverse Effect on Neighboring Properties (X § 901.2(b))

The proposed residential use will not tend to adversely affect neighboring properties. The analysis under this criterion considers impacts on neighboring properties in terms of traffic, noise, service access, visual character, light, air, and similar factors.

- **Traffic and parking:** The proposed development adds only two dwelling units, each with one required parking space provided on-site. The traffic impact of two additional households in an established residential neighborhood is negligible. DDOT confirmed in its February 19, 2026 communication to OP in ZC Case No. 25-06 that "impacts on the transportation network are expected to be minimal" for alley lot development generally, noting that 89.8% of alley lots in DC are located within one-half mile of a Metrorail station or one-quarter mile of a High Frequency MetroBus route. The subject property is located in a highly transit-accessible area.
- **Noise and operational impacts:** Row dwellings are inherently quiet residential uses. There are no commercial, industrial, or high-activity uses proposed that could generate noise, odor, or other operational impacts on neighboring properties.
- **Visual character and scale:** The proposed buildings are two stories plus cellar with a height of 19.91 feet — below the 20-foot maximum. They are consistent in scale and massing with alley-oriented development in the neighborhood and will not loom over or visually dominate adjacent street-facing structures.
- **Light and air:** Both proposed buildings maintain generous pervious surface coverage — 45% on the south lot and 30% on the north lot, compared to the 10% minimum — ensuring substantial open, unpaved area around the structures. Rear yards from the alley centerline substantially exceed the minimum, providing open space within the lots.
- **Service access and emergency response:** The existing alley already serves the block for service and emergency access. FEMS has committed to conducting case-by-case safety evaluations of specific alley sites to determine whether safe access, positioning, and operational requirements can be met. The applicant welcomes and supports that process.

VI. LEGISLATIVE CONTEXT: ZONING COMMISSION CASE NO. 25-06

The Board of Zoning Adjustment is not asked to operate in a vacuum. It functions within the broader context of the Zoning Regulations and the evolving policy direction of the Zoning Commission. In this case, that context powerfully supports granting the requested relief.

ZC Case No. 25-06 is a pending Zoning Commission text amendment to alley lot regulations, initiated by the Office of Planning. The Commission held a public hearing on January 12, 2026. The Office of Planning issued a post-hearing report on March 2, 2026 — just two days before the current BZA Referral Memorandum was issued — recommending that the Commission **approve** the proposed text amendments. The Office of the Attorney General has expressed support. DDOT has no objection.

While the ZC Order is not yet final and cannot be relied upon as binding law in this proceeding, it **directly and unambiguously reflects the direction in which the Board is moving**. Among its key provisions directly relevant to this application:

- Proposed new Subtitle C § 306.5 would establish a formal special exception pathway for alley lot subdivisions that do not meet the requirements of C § 306.1 — precisely the relief being sought in this case under Item 1 of the BZA Referral Memorandum. The proposed text requires the Board to find, after receiving agency comments, that granting the special exception "would not result in undue adverse impacts to nearby properties." This is the same substantive standard the Board applies under Subtitle X § 901.2.
- Proposed amendments to Subtitle C § 702.4 would add a new subsection (g) exempting alley lot uses listed as matter of right or special exception under Subtitle U §§ 600 and 601 from vehicle parking requirements — reflecting the Commission's determination that parking minimums are inappropriate for well-located alley lot development.
- Proposed revised criteria under Subtitle U § 601.1(f)(1)-(3) would simplify and clarify the standards for special exception residential use on substandard alleys — the exact relief being sought in Item 3 of the BZA Referral Memorandum.
- The OP Post-Hearing Report expressly identifies as a goal of the amendment to "facilitate the use of vacant or underutilized alley lots where current regulations render use or development of the properties infeasible" — a description that precisely characterizes the subject property.

Courts and administrative bodies regularly give weight to pending legislative or regulatory amendments when evaluating applications under current law, particularly where the pending amendment addresses precisely the same policy question presented by the application. Here, the Zoning Commission has effectively determined — through a well-developed, multi-stakeholder public process — that alley lot subdivisions on substandard alleys should proceed through the special exception process, and that the criteria for such relief should be **simplified and made more applicant-friendly**, not more restrictive. The Board should grant the requested relief consistent with and in furtherance of this clearly expressed legislative direction.

VII. COMPARATIVE INTENSITY ANALYSIS

The proposed development is materially **less intense** than by-right residential development on a conforming RF-1 lot, and substantially less intense than the alley-adjacent development already approved in the same square.

- A conforming RF-1 street-facing lot with full frontage could accommodate a building of significantly greater footprint, height, and unit count. The two proposed row dwellings are each limited to a single dwelling unit, two stories plus cellar, with lot occupancies of 72.8% (south) and 62% (north) — both well below the 90% maximum.
- The average pervious surface of the two proposed lots is approximately 37.5% — nearly four times the 10% minimum. This substantially exceeds the pervious surface

provided on most developed parcels in the neighborhood and reflects genuine sensitivity to stormwater and green space objectives.

- The combined footprint of both proposed buildings (approximately 2,368 square feet) is modest for two dwelling units and reflects the constrained lot sizes inherent to alley lot development.
- By contrast, the Zoning Administrator's 2014 determination for 524-526 Lamont Street NW in the same Square 3046 approved conversion to six (6) apartment units on a 5,795 square foot lot using the same alley network. The applicant here proposes two single-family row dwellings — a fraction of the density and intensity of the already-approved neighboring development.

VIII. CONSISTENCY WITH BOARD PRECEDENT AND DISTRICT POLICY

The Board of Zoning Adjustment has a well-established body of precedent recognizing that alley lots throughout Washington, DC present physical constraints that justify variance and special exception relief when strict application of the Zoning Regulations would render development infeasible. This application is fully consistent with that precedent.

In prior cases, the Board has granted area variances for alley width and lot area on properties where the physical characteristics of the lot and alley were pre-existing conditions not created by the applicant. In those cases, the Board has consistently found that: (1) the pre-existing nature of the constraint satisfies the exceptional condition requirement; (2) the inability to comply due to fixed physical infrastructure satisfies the practical difficulty standard; and (3) modest, code-compliant residential development on alley lots does not substantially impair the intent of the Zoning Regulations.

This application presents precisely those facts. The alley width is pre-existing infrastructure. Compliance is physically impossible. The proposed development is modest, code-compliant, and consistent with the RF-1 zone's residential character. The Board's grant of relief here would be fully consistent with its prior decisions and would reinforce the District's longstanding policy of encouraging appropriate infill residential development on underutilized alley lots.

IX. PROPOSED FINDINGS OF FACT

The applicant respectfully proposes that the Board adopt the following findings of fact in support of granting the requested relief:

1. The subject property at 3207 6th Street NW (Square 3046, Lot 0808, RF-1 zone) is a long-established alley tax lot with an existing alley width of ten (10) feet — a pre-existing physical condition of the public right-of-way that was not created by the applicant and that cannot be altered by the applicant.

2. Both proposed record alley lots (north: 1,850 sq ft; south: 1,813 sq ft) meet or exceed the 1,800 sq ft minimum lot area required in the RF-1 zone, and both proposed row dwellings comply with all applicable RF-1 alley lot development standards except as identified in the March 4, 2026 BZA Referral Memorandum.
3. Strict application of the 24-foot minimum alley width requirement would render the property permanently undevelopable, as the width of the public alley is fixed infrastructure that the applicant has no authority or ability to expand. This constitutes an exceptional condition and practical difficulty within the meaning of Subtitle X § 1000.1.
4. Granting the area variance for alley width will not cause substantial detriment to the public good or impair the intent, purpose, or integrity of the Zoning Regulations or Zoning Map.
5. The proposed north lot row dwelling's zero side yard from the abutting non-alley lot is consistent with the row dwelling building type as contemplated in the RF-1 zone and will not adversely affect the neighboring property in terms of light, air, fire safety, or visual character.
6. Residential use of both proposed alley lots is in harmony with the general purpose and intent of the RF-1 zone, is consistent with the Zoning Administrator's prior determination that residential primary access off the same alley network in Square 3046 is permissible, and will not adversely affect neighboring properties.
7. The relief requested is the minimum necessary to permit reasonable beneficial use of a long-vacant alley lot that would otherwise remain permanently undeveloped due solely to the pre-existing width of the public alley.
8. The Zoning Commission is actively pursuing text amendments (ZC Case No. 25-06) that would explicitly authorize the Board to approve subdivisions like this one as special exceptions under proposed C § 306.5, reflecting the Commission's affirmative policy determination that carefully reviewed alley lot development of this nature serves the public interest.
9. The applicant satisfies all applicable standards of Subtitle X §§ 1000.1 and 901.2 for the relief requested.

Respectfully submitted,

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