

June 10, 2022

Mr. Anthony J. Hood, Chairman  
D.C. Zoning Commission  
One Judiciary Square  
441 4<sup>th</sup> Street NW, 2<sup>nd</sup> Floor  
Washington, D.C. 20001

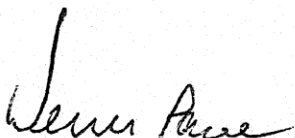
**RE: Zoning Commission Case No. 22-13 – Application of the Wesley Theological Seminary for Approval for a Campus Plan – Reply To Untimely Filing By Applicant On Response To NLC-SVWHCA Zoning Compliance Analysis**

Dear Chairman Hood and Members of the Commission:

In response to yet another untimely filing by Wesley Theological Seminary on June 10, Neighbors for a Livable Community (NLC) and Spring Valley-Wesley Heights Citizens Association (SVWHCA) again express deep concern about the applicant’s failure to follow the rules in this case by introducing new evidence only a few days before the hearing and using a proffered expert witness to rebut NLC-SVWHCA filings before the Commission approves the expert witness. Moreover, in its latest filing, Wesley finally submits the substance of proposed expert testimony, but long after the deadline for submission; only three days before the hearing in this case; and before the Commission acts on a motion to allow even the consideration of the expert witness because Wesley missed the deadline for submission of its witness list.

The submission of this detailed testimony by the expert witness which is nothing more than a response to NLC-SVWHCA filings is extremely prejudicial and we hope you will conclude the same. Thank you for your consideration.

Sincerely,



Dennis Paul, President  
Neighbors for a Livable Community

S/William F. Krebs  
DC Bar No. 960534  
Interim President and Counsel  
Spring Valley-Wesley Heights Citizens Association  
Counsel, Neighbors for a Livable Community

**Certificate Of Service**

We hereby certify that on June 10, 2022, this letter was delivered via electronic mail to the following:

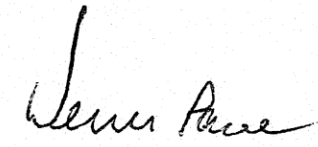
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