

DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT
441 4th Street, N.W.
Washington, D.C. 20001

Appeal of the Dupont Circle Citizens' Association (DCCA)

BZA Appeal 19374

DCRA'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW
AND MOTION TO ACCEPT LATE FILING

DCRA respectfully requests that the Board of Zoning Adjustment (the “**Board**”) grant DCRA’s Motion to Permit Late Filing pursuant to Section Y-302.19 to waive the date for submission of proposed Findings of Fact and Conclusions of Law, originally set at March 8, 2017 by the Board at the February 22, 2017 hearing,¹ and as subsequently continued to March 22, 2017 by the Board at the March 8, 2017 meeting. DCRA sincerely apologizes for this delay, which is due to the heavy litigation schedule of DCRA’s Counsel and illness. DCRA believes that this delay will cause no prejudice to the parties since the Draft Findings of Fact and Conclusions of Law are for the benefit of the Board alone, with no responses permitted by any party. For the record, DCRA’s Counsel attests that he has not read either Appellant’s or Property Owner’s draft Findings of Fact and Conclusions of Law prior to submitting this filing.

DCRA hereby submits the requests proposed Findings of Fact and Conclusions of Law in this Appeal.

Respectfully submitted,
CHARLES THOMAS
General Counsel
Department of Consumer and Regulatory Affairs

Date: 3/27/17

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¹ BZA Appeal 19374, February 22, 2017 hearing transcript, at 304.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT**

Appeal No. 19374 of the Dupont Circle Citizens' Association pursuant to 11-Y DCMR § 100.4 and 302 of the 1958 Zoning Regulations, from a decision of the Zoning Administrator, Department of Consumer and Regulatory Affairs, to issue a building permit (B1603105) on July 18, 2016 to allow conversion of a single family residence to a four unit apartment building at 1514 Q Street, N.W. (Square194, Lot 27).

HEARING DATES: December 14, 2016, January 18, 2017, and February 22, 2017
DECISION DATE: March 29, 2017

DECISION AND ORDER

INTRODUCTION

The appeal was filed with the Board of Zoning Adjustment (“**Board**” or “**BZA**”) on September 16, 2016 by the Dupont Circle Citizens' Association (“**Appellant**”). Appellant challenges the determination by the Zoning Administrator (“**ZA**”) that the lower level at 1514 Q Street, N.W. (the “**Property**”) as proposed in a permit application to renovate the Property submitted to DCRA (the “**Application**”) should be classified as a cellar, and so excluded from the calculation of the Gross Floor Area (“**GFA**”) and Floor Area Ratio (“**FAR**”) as defined in Section 199.1 of the 1958 Zoning Regulations under which the Permit was issued. Appellant alleges that the Zoning Administrator erred in not classifying the lower level of the Application as a basement, and so included in the GFA and FAR calculations, because (i) the lower level includes “habitable rooms” which Appellant alleges should convert an otherwise cellar into a basement and (ii) the lower level does not comply with the definition of “cellar” as the ceiling is more than four feet above the adjacent finished grade. Appellant alleges that this alleged misclassification of the lower level led to DCRA issuing building permit B1603105 (the “**Permit**”) in violation of Section 402.4 of the 1958 Zoning Regulations,² which established the maximum FAR allowed in the R-5-B zone district in which the Property is located.

Based on the evidence of record, including extensive prehearing submissions and testimony received at the public hearing, and for the reasons set forth below, the Board denies the appeal as untimely filed and as without merit.

PRELIMINARY MATTERS

Notice of Appeal and Notice of Hearing.

² As the permit appealed was issued under the 1958 Zoning Regulations, the merits of the appeal were reviewed for compliance with the 1958 Zoning Regulations, although the process of the appeal was governed by the 2016 Regulations, effective September 6, 2016. For the purposes of this Order, the 1958 Zoning Regulations are referred to as the “**1958 Zoning Regulations**”, whereas the 2016 Zoning Regulations are referred to as the “**2016 Zoning Regulations**”).

By a memorandum dated October 4, 2016, the Office of Zoning provided notice of the appeal to Advisory Neighborhood Commission (“ANC”) 2B, in which district the Property is located; ANC 2B05, the Single Member Commission in whose district the Property is located; the Councilmember for Ward Two, the four At-Large Councilmembers and Council Chairman; the Office of Planning; and the ZA, whose approval of the issuance of the Permit is challenged in this appeal. The Office of Zoning scheduled a hearing on December 14, 2016. Pursuant to Sections 11-Y 504.1 and 504.2 of the 2016 Zoning Regulations (under which the appeal process was regulated), the Office of Zoning mailed notice of this hearing to ANC2B, Appellant, Property Owner, the Councilmember for Ward Two, and the ZA. Notice was also published in the D.C. Register on October 21, 2015.

Parties.

Appellant, the ZA, represented by the Department of Consumer and Regulatory Affairs (“DCRA”), and the Property Owner were all automatically parties to this proceeding under Section Y-501.1 of the Zoning Regulations. There were no other requests for party status.

The Board received prehearing materials from the Appellant on September 16, 2016 (BZA Exhibits 1-3, 20-21), on November 22, 2016 (BZA Exhibits 22-23), on November 23 (BZA Exhibits 24-26), on December 8, 2016 (BZA Exhibit 29), on December 11, 2016 (BZA Exhibit 34), on December 13, 2016 (BZA Exhibit 35), on January 13, 2017 (BZA Exhibit 41), on January 17, 2017 (BZA Exhibit 44), on January 18, 2017 (BZA Exhibit 46), on February 8, 2017 (BZA Exhibits 52-53), on February 16, 2017 (BZA Exhibit 56), on February 22, 2017 (BZA Exhibit 78), and on February 22, 2017 (BZA Exhibit 80). The Permit Holder submitted prehearing materials for the Board's consideration on December 7, 2016 (BZA Exhibits 27-28 and 43-43T), on December 14, 2016 (BZA Exhibit 36), on December 16, 2016 (BZA Exhibit 37), on December 19, 2016 (BZA Exhibits 38-39), on January 12, 2017 (BZA Exhibit 40), on January 17, 2017 (BZA Exhibit 45), on January 18, 2017 (BZA Exhibit 47), on January 25, 2017 (BZA Exhibits 49-49C), on January 30, 2017 (BZA Exhibit 51), on February 14, 2017 (BZA Exhibits 54-44), on February 16, 2017 (BZA Exhibits 57-58), on February 17, 2017 (BZA Exhibits 59-71), on February 18, 2017 (BZA Exhibit 76), on February 21, 2017 (BZA Exhibits 77 and 79), and on February 22, 2017 (BZA Exhibit 81). DCRA submitted prehearing materials for the Board's consideration on December 9, 2016 (BZA Exhibits 30-34), January 17, 2017 (BZA Exhibits 42-42H), on January 25, 2017 (BZA Exhibit 50), and on February 28, 2017 (BZA Exhibits 72-72C).

Motions to Dismiss.

The Board convened a public hearing on January 18, 2017, at which point DCRA made oral Motions to Dismiss for Lack of Standing and for Untimely Filing. The Board continued the appeal to permit the filing of written Motions by the parties. On January 25, 2017, DCRA filed a Motion to Dismiss for Lack of Standing and for Untimely Filing (BZA Exhibit 50). Also on January 25, 2017, the Property Owner filed a Motion to Dismiss for Untimely Filing (BZA Exhibits 49-49C). Appellant filed a response on February 8, 2017 (BZA Exhibit 53). On February 16, 2017, the Property Owner filed a reply to Appellant's response (BZA Exhibit 57). On February 18, 2017, DCRA filed a reply to Appellant's response (BZA Exhibit 72-72C).

The Board heard arguments and received testimony on the Motions to Dismiss at the beginning of the hearing on February 22, 2017, but deferred ruling on those Motions.

Hearing and Closing of the Record.

The Board convened a public hearing on February 22, 2017, during which time Appellant presented its case through Brian Gelfand, while DCRA and the Property Owner presented their respective cases through legal counsel. The Board received testimony on behalf of Appellant from Robin Deiner, the President of the Appellant, Brian Gelfand, Alan Gambrell, and Don Hawkins. The Board received testimony on behalf of Permit Holder from John Casey, representing the Property Owner, and Shane Dettman, the Director of Planning Services at Holland & Knight, Counsel for the Property Owner. The Board received testimony on behalf of DCRA through the ZA, Matthew LeGrant.

The Board deferred its decision on the Motions to Dismiss and the merits of the case and closed the record, except to receive proposed findings of fact and conclusions of law on the Motions to Dismiss from the parties by March 8, 2017. The Board scheduled the case for decision on March 15, 2017. Upon Appellant's filing of its March 7, 2017 Motion to Continue because of the delayed filing of the transcripts of the hearing (BZA Exhibits 83-84), the Board continued the decision to March 29, 2017, with submissions due by March 22, 2017. At the March 29, 2017 meeting, the Board considered the Motions to Dismiss and the merits of the case and voted - - to deny the appeal.

FINDINGS OF FACT

The Property.

1. The Property is a lot located at 1514 Q Street, N.W. (Square 194, Lot 27).
2. The Property is currently owned by 1514 Q LLC.
3. The Property was located in the R-5-B Zone District under the 1958 Zoning Regulations under which the appeal was filed and the Permit issued.
4. On November 3, 2015, the Property Owner presented the renovations proposed in the Application to a public meeting held by the Zoning, Planning and Development committee of Advisory Neighborhood Commission 2B, in which district the Property is located. (Exhibit 72B).
5. On December 21, 2015, ANC 2B05 Commissioner Nichols ("ANC Nichols") met with the ZA about the Application. (Exhibit 72B).
6. On February 12, 2016, a DCRA inspector visited the Property with ANC Nichols to confirm the measurements of the lower level windows and ceiling and of the adjacent

grade to determine if the proposed lower level would qualify as a basement or a cellar. (Exhibits 27A, at 3 and Exhibit B [affidavit of Property Owner], and 72B [dating this meeting as February 18, 2016]).

7. The Property Owner submitted an affidavit that he executed on February 27, 2016 stating that the attached photos were taken during the February 12, 2016 DCRA inspection of the Property and showed that the lower level ceiling was less than four feet above the adjacent grade and therefore met the definition of a cellar under Section 199.1 of the 1958 Zoning Regulations. (Exhibit 24B).
8. On February 22, 2016, Mr. Gelfand emailed DCRA, challenging the Application as over FAR because he asserted that the lower level should be classified as a basement, and not a cellar. This email copied ANC Nichols, Mr. Hawkins and others. (Exhibit 72A).
9. On March 7, 2016, ANC Nichols emailed DCRA requesting another meeting to challenge the Application, and recognizing Mr. Gelfand and Mr. Hawkins “for their leadership on this matter”. (Exhibit 72B).
10. On March 8, 2016, in response to ANC Nichols’ request of the day before, two representatives of the ZA visited the Property to meet with Mr. Gelfand. (Exhibit 72C).
11. On March 9, 2016, Mr. Gelfand emailed DCRA to repeat his allegation that the lower level was incorrectly classified on the Application as a cellar on the basis of the definition of “habitable room” and so improperly excluded from the GFA and FAR calculations. (Exhibits 27B, at 1-2, and 72C).
12. On March 21, 2016, the ZA published a Determination Letter (the “**Determination Letter**”) on the ZA’s public website that communicated his determination to approve several aspects of the Application, including that the lower level is properly classified as a cellar on the basis of plans submitted with the Application and the measurements taken at the February 12, 2016 site visit by DCRA that determined that the lower level ceiling was less than four feet from adjacent finished grade and so a cellar under the definition in Section 199.1 of the 1958 Zoning Regulations. The Determination Letter stated that the ZA had
“determined that there is sufficient evidence to determine the Cellar Area satisfies the definition of a “cellar” under 11 DCMR § 199.1 [of the 1958 Zoning Regulations]. Therefore the Project satisfies the requirements of the R-5-B Zone District. Accordingly it is my determination that the Project may be constructed as a matter of right”. (underscore and italics added).
(Exhibit 27A, at 1-7).
13. On that same day, the ZA replied to Mr. Gelfand’s March 9, 2016 email in an email to which the Determination Letter was attached, and which was sent to Mr. Gelfand, ANC Nichols, and Appellant’s two witnesses (Don Hawkins and Alan Gambrell). (Exhibit 27B, at 1).

14. On the next day, March 22, 2016, the ZA followed up with another email (the “**Habitable Room Email**”) to Mr. Gelfand’s March 9, 2016 email - with ANC Nichols, Mr. Hawkins, and Mr. Gambrell copied - specifically rejecting Mr. Gelfand’s assertion that the definition of “habitable room” made the lower level into a basement and so rendered the Application non-conforming for FAR. The ZA’s email concluded
“I hope this information is helpful in the explanation of my office’s approval of the project.” (underscore and italics added).
(Exhibit 27B, at 3).
15. In its Pre-Hearing Statement, Appellant recognized that the ZA had made a decision in the Determination Letter, stating that:
“[t]he ZA, in issuing his zoning determination letter of March 21, 2016 (see Exhibit 2), allowed the following alternations ...” (underscore and italics added)
(Exhibit 24, at 3). Appellant included the Determination Letter as an exhibit in the Pre-Hearing Statement (Exhibit 26, at 1-5).
16. In its Pre-Hearing Statement, Appellant recognized that the ZA had made a decision in the Habitable Room Email, which it quoted extensively in describing the ZA’s alleged errors:
“The ZA sent the following March 22, 2016 email to abutters, explaining DCRA’s rationale for excluding the lower level from FAR.”
(Exhibit 24, at 2-3, and at 5 and 6).
17. May 21, 2016 was the 60th day following the ZA’s direct notification of Mr. Gelfand, ANC Nichols, and Appellant’s two witnesses of his determination that he had rejected their challenges to the classification of the lower level in the Application as a cellar on both the grounds of the measurement from ceiling to adjacent finished grade (stated in the Determination Letter) and the application of the definition of habitable room. Mr. Gelfand, ANC Nichols, Mr. Hawkins, and Mr. Gambrell all chose to not appeal that Determination Letter by that date.
18. On July 18, 2016, the Permit was issued (undisputed by the parties. *See* Appellant’s Initial Appeal Statement, Exhibit 2, at 1; and DCRA’s Pre-Hearing Statement, Exhibit 30, at 1).
19. As of July 31, 2016, the Property Owner asserted that the project authorized by the Permit was “under roof” as defined in Section Y-302.3(a) of the 2016 Zoning Regulations. (Exhibit 49C).
20. August 11, 2016 was the 10th day after the project authorized by the Permit was “under roof” per the Property Owner’s affidavit, and so the final day of the 10 day appeal period established by Section Y-302.3(a) of the 2016 Zoning Regulations.
21. On or about September 5, 2016, Mr. Gelfand told Appellant about the Determination Letter. (February 22, 2017 hearing transcript at 156-7, and 158).

22. Mr. Gelfand has been a member of Appellant for “about two years” prior to the February 22, 2017 hearing. (February 22, 2017 hearing transcript at 165).

23. September 16, 2016 was the 60th day following the issuance of the Permit, and the day Appellant filed this appeal.

Evidence supplied at Hearing regarding the Motions to Dismiss.

24. At the hearing, Brian Gelfand, Alan Gambrell, and Robin Deiner, president of Appellant, testified on behalf of Appellant. Mr. Gelfand testified as to when he learned of the Determination Letter and Habitable Room Email and when he conveyed that information to Appellant. Mr. Gambrell and Ms. Deiner testified as to the interpretation of the appeals process by Appellant.

25. John Case, the representative of the Property Owner, testified on behalf of the Permit Holder. Mr. Casey testified as to the email delivery of the Determination Letter to Mr. Gelfand and ANC Nichols.

26. The ZA did not testify on the Motions to Dismiss but rested on the Determination Letter, Habitable Room Email and other emails entered into the record.

CONCLUSIONS OF LAW AND OPINION

The Board is authorized to hear and decide appeals of alleged violations of the Zoning Regulations by Section Y-100.4 of the Zoning Regulations and Section 8 of the Zoning Act of 1938 (D.C. Official Code § 6-641.07(g)(1)).

Appellant appealed the ZA’s determination that the lower level of the Property was classified as a “cellar” and not a “basement”, and so not included in the calculation of GFA and FAR. Appellant challenged this classification on two grounds, alleging that (i) the lower level included “habitable rooms” per the definition in Section 199.1 of the 1958 Zoning Regulations, which definition prohibited habitable rooms in “cellars”; and (ii) the ceiling of the lower level was allegedly more than four feet (4’) above the adjacent finished grade, which falls under the definition of “basement”, not that of a “cellar”. Based on the findings of fact above and as detailed below, the Board concludes that the Appeal was untimely filed and would dismiss on that basis alone. As to the merits of the appeal, the Board concludes that the ZA did not err in approving the Permit as in compliance with Sections 402.4 of the 1958 Zoning Regulations.

Standing of Appellant.

Section Y-302.12(f) of the 2016 Zoning Regulations requires an appellant to make a specific statement of how the appellant has standing to bring the appeal by explaining how appellant is aggrieved by the alleged zoning violation. DCRA asserted that Appellant’s pre-hearing statement failed to meet this standard because Appellant vaguely referred to residents whom it represented without any specifics as to individuals, their residence or how they were aggrieved by the ZA’s

alleged violation of the 1958 Zoning Regulations. Appellant responded by citing one of its members, Brian Gelfand, although without specifying a particular injury caused to Mr. Gelfand from the alleged zoning violation. DCRA recognized that Mr. Gelfand likely had standing as the immediate neighbor to the Property, but asserted that since Mr. Gelfand had chosen to not file his own appeal but instead initiated and led Appellant's appeal, that Appellant's standing relied solely on Mr. Gelfand's standing.

The Board concludes that Appellant does have standing, but only through Mr. Gelfand, who initiated and prosecuted the appeal, and who was the only individual cited by Appellant in justifying its standing. Although the Board has a broad view of standing, Appellant failed to state a clear injury to Appellant by the ZA's alleged violations, except through the membership of Mr. Gelfand, the adjacent neighbor to the Property. In light of Mr. Gelfand's notice of the ZA's decision by the Determination Letter and his decision to not appeal it, discussed below, the Board views Appellant's appeal as an appeal by Mr. Gelfand using Appellant to avoid the consequences of Mr. Gelfand's decision to not appeal the Determination Letter.

Timeliness of Appeal

Section Y-302.2 of the 2016 Zoning Regulations requires an appeal to be filed within sixty (60) days of the earliest date on which the person filing the appeal first had, or reasonably should have had, notice or knowledge of the challenged decision. Section Y-302.5 clarifies that "a zoning appeal may only be taken from the first writing that reflects the administrative decision complained of to which the appellant had notice."

Here, the ZA's first writing of his decision that the lower level of the Property is classified as a cellar and not count toward the GFA and FAR calculation, which Appellant alleges is violated the stated in the appeal was issued as the Determination Letter on March 21, 2016, as confirmed and elaborated upon in the Habitable Room Email of the following day. The ZA published the Determination Letter on the public DCRA website and also directly emailed to Mr. Gelfand; to ANC Nichols, in whose district the Property is located; and to Appellant's two witnesses, Mr. Hawkins and Mr. Gambrell. The next day, March 22, 2016, the ZA issued a follow up email to the Determination Letter directly rejecting Appellant's allegation that the lower level must be classified as a basement due to the definition of "habitable room".

Mr. Gelfand, as well as ANC Nichols, Mr. Hawkins, and Mr. Gambrell, chose to not appeal the Determination Letter and Habitable Room Email within the 60-day time period established by the Zoning Regulations (Section Y-302.2 of the 2016 Zoning Regulations and 3122.2(a) of the 1958 Zoning Regulations). Instead, Mr. Gelfand informed the Appellant, of whom he was a member since approximately February 2015 – in other words, during his emails with the ZA challenging the Application's classification of the lower level as a cellar and FAR calculation – only in early September 2017. This was almost six months after Mr. Gelfand had received direct email communication from the ZA stating the ZA's determination rejecting Mr. Gelfand's challenges over the classification of the lower level of the Application as a cellar based both on the measurement from the lower level ceiling to the adjacent finished grade and on the application of the definition of "habitable room". This was also almost four months after the 60-

day maximum appeal period after the ZA emailed the Determination Letter and Habitable Room Email to Mr. Gelfand, ANC Nichols, Mr. Hawkins, and Mr. Gambrell.

Moreover, the project authorized by the Permit was “under roof” by July 31, 2016, which triggered a maximum 10-day appeal period per Section Y-302.3 of the 2016 Zoning Regulations (Section 3112.2(b) of the 1958 Zoning Regulations). No appeal was filed as of August 11, 2016, the last day of this 10-day appeals period. Instead the appeal was filed more than 30 days later, on September 16, 2016.

The Board therefore concludes that the appeal must be dismissed as untimely filed, both because (i) the project authorized by the Permit was “under roof” more than a month before the appeal was filed and because (ii) Mr. Gelfand failed to appeal the “first writing” of the ZA’s Determination Letter, as elaborated and confirmed by the Habitable Room Email of the next day within the 60-day maximum appeal period – by May 21, 2016. Since Mr. Gelfand was the leader of the appeal, asking Appellant in early September to appeal Mr. Gelfand’s alleged violations that Mr. Gelfand knew the ZA had already rejected in writing almost six months earlier, and then representing the Appellant in the hearing, the Board determines that Mr. Gelfand was bound by his notice and knowledge of the ZA’s “first writing” in the Determination Letter and Habitable Room Email to timely file an appeal within 60-days of that “first writing” – by May 21, 2016. Mr. Gelfand cannot use Appellant, of whom he was a member at the time he received the Determination Letter and Habitable Room Email, to wash away his responsibility to timely file. Under these unusual circumstances where Mr. Gelfand was the driver of the appeal and had prior notice of the decision appealed, the Board concludes that Mr. Gelfand’s notice and knowledge, widely shared by the public publication of the Determination Letter and its email, with the Habitable Room Email, to ANC Nichols, should be imputed to Appellant.

DECISION

For all these reasons, the Board concludes that this appeal was untimely filed because (i) the appeal was not filed within the ten-day maximum period after the project authorized by the Permit was “under roof” as established by Section Y-302.3 of the 2016 Zoning Regulations; and because (ii) Appellant had or should have had notice or knowledge of the ZA’s Determination Letter and accompanying Habitable Room Email through Mr. Gelfand, who was a member of Appellant at the time he directly received the Determination Letter and Habitable Room Email, and therefore had to file the appeal no later than May 21, 2016, which Appellant failed to do.

Based on the foregoing, the Board finds the appeal untimely filed. It is therefore **ORDERED** that the appeal is **DENIED**.

Vote taken on March 29, 2017.

VOTE: _____ (Frederick L. Hill, Carlton Hart, and Michael Turnbull to deny the appeal; two seats vacant).

BY ORDER OF THE D.C. BOARD OF ZONING ADJUSTMENT

A majority of the Board members approved the issuance of this order.

ATTESTED BY: _____
SARA A. BARDIN
Director, Office of Zoning

FINAL DATE OF ORDER: _____

PURSUANT TO 11-Y DCMR § 604.7, THIS DECISION AND ORDER WILL BECOME FINAL UPON ITS FILING IN THE RECORD AND SERVICE UPON THE PARTIES. UNDER 11-Y DCMR § 604.11, THIS ORDER WILL BECOME EFFECTIVE TEN DAYS AFTER IT BECOMES FINAL.

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of March 2017, a copy of the foregoing Motion to Accept Late Filing and Proposed Findings of Fact and Conclusions of Law was served via electronic mail to:

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