

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE ATTORNEY GENERAL



ATTORNEY GENERAL  
KARL A. RACINE

Public Interest Division  
Public Integrity Unit

SUBPOENA

In the Matter of  
[REDACTED], et al.

DEMAND FOR PRODUCTION  
OF DOCUMENTS

To: [REDACTED], Board Member  
[REDACTED] Homeowners Association, Inc.  
[REDACTED]  
Washington, DC 20[REDACTED]

The Attorney General for the District of Columbia is investigating whether the [REDACTED] Association, Inc. is exceeding or abusing its authority as a nonprofit corporation or acting contrary to its nonprofit purposes.

Pursuant to the authority vested in the Attorney General for the District of Columbia by the Nonprofit Corporation Act, D.C. Official Code § 29-412.20(b)(1), you are hereby commanded to produce the documents specified below. The documents shall be submitted to the Office of the Attorney General at the following address, no later than December 31, 2015:

Attn: [REDACTED]  
Office of the Attorney General for the District of Columbia  
441 Fourth Street, N.W., Suite 630 South  
Washington, DC 20001  
Telephone: (202) 727-[REDACTED]  
[REDACTED]@dc.gov

Questions regarding this subpoena should be directed to Mr. [REDACTED]

### Instructions

- a) This Subpoena requests production of all documents described below in your possession, custody or control, including all written, graphic, hard-copy, and electronically-stored information.
- b) You may produce original documents for inspection and copying, or you may produce hard copies or electronic copies of the original documents.
- c) "HOA" means [REDACTED] Homeowners Association, Inc.

### Requested Documents

- 1. Documents sufficient to show the names, addresses, and phone numbers of all HOA members since January 1, 2013.
- 2. Documents sufficient to show the names, addresses, and phone numbers of all HOA directors since January 1, 2013.
- 3. All documents showing the rules governing HOA elections since January 1, 2013, including, but not limited to, the rules governing eligibility to vote in HOA elections.
- 4. All documents relating to determinations of individuals' eligibility or ineligibility to vote in HOA elections since January 1, 2013.
- 5. All documents relating to elections of HOA directors since January 1, 2013, including, but not limited to, written communications regarding candidates or procedures, election materials distributed or displayed to HOA members, ballots cast, and documents reporting or disputing election results.

6. Documents sufficient to show the details of each fine and each assessment that the HOA has imposed any of its members since January 1, 2013, including, for each such fine or assessment, the name and address of the member, the amount and date of the fine or assessment, the amounts and dates of any fees added to the fine or assessment, and the reason(s) for the fine or assessment.

7. All documents showing (i) requests by HOA members since January 1, 2013, to view or obtain copies of the HOA's financial records or other records, or (ii) responses to such requests.

8. All documents showing the HOA's parking rules or parking enforcement policies in effect since January 1, 2013.

9. Documents sufficient to show all permits obtained by the HOA relating to the installation of cameras since January 1, 2011.

Issued: December 1, 2015

KARL A. RACINE  
Attorney General for the District of Columbia

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Attorney General  
Public Interest Division

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Office of the Attorney General  
441 Fourth Street, N.W., Suite 600-South  
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Attorneys for the District of Columbia