

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

<p>CLIENT EARTH, 23901 Calabasas Rd., Suite 1010, Calabasas CA 91302; U.S. PIRG EDUCATION FUND, 1543 Wazee Street, Suite 460, Denver, CO 80202; and ENVIRONMENT AMERICA RESEARCH & POLICY CENTER, 600 Pennsylvania Ave SE, Suite 400, Washington, DC 20003,</p> <p style="text-align: right;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>WASHINGTON GAS LIGHT COMPANY, 6801 Industrial Road, Springfield, VA 22151</p> <p style="text-align: right;">Defendant.</p>	<p>Case No. _____</p> <p><u>COMPLAINT</u></p> <p><u>DEMAND FOR JURY TRIAL</u></p>
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On behalf of the general public and D.C. consumers, Plaintiffs U.S. PIRG Education Fund, Environment America Research & Policy Center, and ClientEarth (collectively, “Plaintiffs”), by and through their counsel, bring this action against Defendant Washington Gas Light Company (“Washington Gas” or “Defendant”) concerning its false and deceptive marketing of their natural gas products and services as “clean” and sustainable. Plaintiffs allege the following based upon information, belief, and the investigation of their counsel:

INTRODUCTION

1. Dramatic changes to the Earth’s climate have caused concern among the citizens of the District of Columbia and the country.
2. Consumers within the District and across the country believe that climate change poses an existential threat, and that climate change is directly caused by human activities.

3. Specifically, consumers believe that humans' use of fossil fuels for energy and the release of methane and carbon dioxide into the air are among the principal causes of climate change.

4. Because of these beliefs, consumers are reevaluating their choices and the effects of their actions on the environment.

5. Consumers, as Washington Gas knows, are willing to seek out services or products that cause less of an adverse impact on the environment, and support companies that purport to share their values, including a commitment to reducing impact on the environment.¹

6. In particular, there is a growing desire among consumers to reduce their reliance on harmful fossil fuels, and to find opportunities that allow them to fulfil their energy needs while using fuel generated through means they consider less harmful to the environment.² In the District of Columbia, consumers have long had the opportunity to choose their energy providers, creating an incentive for providers to use advertising to capture this growing market of climate-conscious consumers.³

7. Capitalizing on this mounting consumer demand, Washington Gas advertises natural gas as a “clean,” sustainable, and “carbon neutral” alternative to traditional fossil fuels.

8. However, natural gas is *not* a “clean” source of energy. It is a fossil fuel comprised primarily of methane, a powerful greenhouse gas that has a greater negative effect on climate

¹ See, e.g., *The Sustainability Imperative: New Insights on Consumer Perception*, Nielsen, (Oct. 2015), https://www.nielsen.com/wp-content/uploads/sites/3/2019/04/Global20Sustainability20Report_October202015.pdf (consumer survey finding that the majority of consumers seek to support sustainable business practices with their purchases and are more likely to buy products “from a company known for being environmentally friendly.”).

² See, e.g., David Roberts *Utilities Have a Problem: The Public Wants 100% Renewable Energy, and Quick*, Vox, (Oct. 11, 2018, 9:19 AM) www.vox.com/energy-and-environment/2018/9/14/17853884/utilities-renewable-energy-100-percent-public-opinion (stating that 70% of consumers desire electricity made without fossil fuels).

³ *DC Power Connect: Your Energy. Your Choice.*, DC Power Connect, <https://dcpowerconnect.com> (last visited Jul. 25, 2022).

change than carbon dioxide: over 80 times greater over a 20-year period, and 29 times greater over a 100-year period.⁴

9. Washington Gas also claims to be “low carbon” and that its natural gas services promote “carbon neutrality.”

10. But, as of 2018, Washington Gas’s use of “Low-Carbon Gas” was *0%* and it only indicated a projected supply of *2%* of low carbon gas by 2025.⁵ While “low carbon gas” is an illusive and misleading term in itself, as discussed *infra*, this fact shows that Washington Gas is not bothering to ensure its own commitments are met.

11. By deceiving consumers about the nature and quality of the products it produces and sells, and about the nature of its underlying business practices and plans, Washington Gas is able to capture the growing market of consumers in D.C. and elsewhere who are concerned about climate change and seek to support clean energy.

12. Washington Gas’s false and misleading representations and omissions violate the District of Columbia Consumer Protection Procedures Act (“CPPA”), D.C. Code §§ 28-3901, *et seq.*

13. Because Washington Gas’s marketing and advertising tends to mislead and is materially deceptive about the true nature and quality of its products and business, Plaintiffs bring this deceptive advertising case on behalf of themselves and D.C. consumers and seek relief, including declaratory relief and an injunction, to halt Washington Gas’s false marketing and advertising practices.

⁴ Rajendra Pachauri, et al., *Climate Change 2014: Synthesis Report*, Intergovernmental Panel on Climate Change, 87 (2015), https://archive.ipcc.ch/pdf/assessment-report/ar5/syr/SYR_AR5_FINAL_full_wcover.pdf.

⁵ Washington Gas, *Climate Business Plan for Washington, D.C.* (Mar. 16, 2020), <https://washingtongasdcclimatebusinessplan.com/wp-content/uploads/2020/04/Climate-Business-Plan-March-16-2020-FOR-WEB.pdf>.

STATUTORY FRAMEWORK

14. This action is brought under the District of Columbia Consumer Protection Procedures Act, D.C. Code § 28-3901, *et seq.*

15. The CPPA makes it a violation for “any person” to, *inter alia*:

Represent that goods or services have a source, sponsorship, approval, certification, accessories, characteristics, ingredients, uses, benefits or quantities that they do not have;

Represent that goods or services are of a particular standard, quality, grade, style, or model, if in fact they are of another;

Misrepresent as to a material fact which has a tendency to mislead;

Fail to state a material fact if such failure tends to mislead;

Use innuendo or ambiguity as to a material fact, which has a tendency to mislead; or

Advertise or offer goods or services without the intent to sell them or without the intent to sell them as advertised or offered.

D.C. Code § 28-3904(a), (d), (e), (f), (f-1), (h).

16. A violation occurs regardless of “whether or not any consumer is in fact misled, deceived or damaged thereby.” *Id.*

17. The CPPA “establishes an enforceable right to truthful information from merchants about consumer goods and services that are or would be purchased, leased, or received in the District of Columbia.” *Id.* § 28-3901(c). It “shall be construed and applied liberally to promote its purpose.” *Id.*

18. Because Plaintiffs are public-interest organizations, they may act on behalf of the general public and bring any action that an individual consumer would be entitled to bring:

[A] public interest organization may, on behalf of the interests of a consumer or a class of consumers, bring an action seeking relief from the use by any person of a trade practice in violation of a law of the District if the consumer or class could bring an action under subparagraph (A) of this paragraph for relief from such use by such person of such trade practice.

Id. § 28-3905(k)(1)(D)(i). Subparagraph (A) provides: “A consumer may bring an action seeking relief from the use of a trade practice in violation of a law of the District.”

19. A public-interest organization may act on behalf of consumers, *i.e.*, the general public of the District of Columbia and consumers targeted by a defendant’s marketing, so long as the organization has a “sufficient nexus to the interests involved of the consumer or class to adequately represent those interests.” *Id.* § 28-3905(k)(1)(D)(ii). As set forth in this Complaint, *see infra* ¶¶ 22-29, each Plaintiff’s mission includes educating the public, including consumers in the District of Columbia, and engaging in advocacy and litigation related to environmental threats from natural gas and other fossil fuels. Plaintiffs thus have a sufficient nexus to D.C. consumers to adequately represent their interests.

20. This is not a class action, or an action brought on behalf of any specific consumer, but an action brought by Plaintiffs on behalf of the general public, *i.e.*, D.C. consumers who purchase natural gas and may be targeted by Defendant’s marketing claims. No class certification will be requested.

21. This action does not seek damages. Instead, Plaintiffs seek to end the unlawful conduct directed at D.C. consumers. Remedies available under the CPPA include “[a]n injunction against the use of the unlawful trade practice.” *Id.* § 28-3905(k)(2)(D). Plaintiffs also seek declaratory relief in the form of an order holding Washington Gas’s conduct to be unlawful.

PARTIES

22. Plaintiff ClientEarth is a 501(c)(3) non-profit, public-interest organization based in Calabasas, California, who performs work throughout the United States and abroad. ClientEarth’s mission is to use the power of the law to bring about systemic change that protects all life on Earth. ClientEarth seeks to educate consumers, investors, policymakers, and the greater public on the

systemic changes necessary to fight climate change, specifically, transitioning away from fossil fuels. ClientEarth also seeks to aid in the implementation of these systemic changes through litigation, policy work, and direct communication and advocacy to consumers and the public.

23. ClientEarth's work has included filings with the Securities and Exchange Commission ("SEC") that encourage climate change-related public disclosures⁶ and collaboration on research regarding the links between climate change and financial and systemic risks.⁷ ClientEarth also advocates for⁸ and connects with consumers and the general public via various social media platforms and email about the ways in which they are impacted by climate change and the continued use of fossil fuels,⁹ and how consumers can make environmentally-friendly choices¹⁰ and understand complex climate issues.¹¹

24. Plaintiff U.S. PIRG Education Fund is a 501(c)(3) non-profit, public-interest organization focused on using independent research to educate consumers on issues that affect their lives and to serve as counterweights to the influence of powerful special interests that threaten the health, safety, or well-being of the public. U.S. PIRG Education Fund has offices in Denver, Colorado and Washington, D.C.

⁶ *SEC Request for Public Input: Climate Change Disclosures*, ClientEarth, <https://www.clientearth.org/latest/documents/sec-request-for-public-input-climate-change-disclosures/> (last visited July 25, 2022); ClientEarth, *Comment in Response to SEC Proposed Rule: The Enhancement and Standardization of ClimateRelated Disclosures for Investors*, SEC, <https://www.sec.gov/comments/s7-10-22/s71022-20132081-302562.pdf> (last visited Jul. 25, 2022).

⁷ Sarah Barker, *et al*, *Fiduciary Duties and Climate Change in the United States*, Commonwealth Climate and Law Initiative, (Oct. 2021) <https://ccli.ubc.ca/wp-content/uploads/2021/12/Fiduciary-duties-and-climate-change-in-the-United-States.pdf>.

⁸ *Report: More investment needed to secure renewable energy future*, ClientEarth, (Jun. 5, 2018), <https://www.clientearth.org/latest/latest-updates/news/report-more-investment-needed-to-secure-renewable-energy-future/>

⁹ *Fossil fuels and climate change: the facts*, ClientEarth, (Feb. 18, 2022), <https://www.clientearth.org/latest/latest-updates/stories/fossil-fuels-and-climate-change-the-facts/>; ClientEarth, LinkedIn, <https://bit.ly/3J5JbPs> (last visited July 25, 2022).

¹⁰ *Could you go plastic-free for Lent?*, ClientEarth, (Feb. 14, 2018), <https://www.clientearth.org/latest/latest-updates/news/could-you-go-plastic-free-for-lent/>.

¹¹ *The verdict from the COP26 climate summit*, ClientEarth, (Nov. 16, 2021), <https://www.clientearth.org/latest/latest-updates/news/the-verdict-from-the-cop26-climate-summit/>

25. Through its Climate Solutions plan, U.S. PIRG Education Fund focuses on ending the nation's reliance on fossil fuels. U.S. PIRG Education Fund's activism on this issue, which includes reports detailing the risks of natural gas¹² and ways forward on truly renewable energy¹³ reaches thousands of people nationwide and supports a grassroots effort for ending government subsidies of environmentally harmful energy sources.

26. U.S. PIRG Education Fund educates and organizes consumers on issues relating to climate impact and natural gas in particular.¹⁴ For example, in February 2022, U.S. PIRG Education Fund organized a consumer petition calling on major retailers to implement better transparency in the marketing of gas stoves, with the goal of informing consumers and the public of the harms associated with natural gas.¹⁵

27. Plaintiff Environment America Research & Policy Center is a 501(c)(3) non-profit, public-interest organization that promotes climate solutions on clean energy, clean air, and clean water. Environment America Research & Policy Center has offices in Denver, Colorado and Washington, D.C. Environment America educates consumers and the public through research reports, news conferences, op-eds, and door-to-door canvassing.

¹² E.g., Tony Dutzik, *et al.*, *Methane Gas Leaks*, U.S. PIRG (June 2022), <https://uspargedfund.org/feature/ncf/methane-gas-leaks>.

¹³ E.g., Brynn Furey, *et al.*, *Electric Buildings Repowering homes and businesses for our health and environment*, U.S. PIRG (April 2021), <https://uspargedfund.org/sites/pirg/files/reports/National%20Electric%20Buildings%20Web.pdf>; *In The Market For A New Stove? Consider Induction*, U.S. PIRG, (May 18, 2022), <https://uspargedfund.org/resources/usf/market-new-stove-consider-induction>.

¹⁴ Jonathan Sundby, *et al.*, *Electric Buildings: How to repower where we live, work and learn with clean energy*, U.S. PIRG (Dec. 2019), https://uspirg.org/sites/pirg/files/reports/US_EL_Bldgs_scrn.pdf; *Healthier Holiday: Minimizing the health risks of cooking with gas*, U.S. PIRG, <https://uspirg.org/reports/usf/healthier-holiday> (last visited July 25, 2022); and *Ten Ways Your Community Can Go All-Electric*, U.S. PIRG, (Feb. 24, 2022), <https://uspargedfund.org/resources/usf/ten-ways-your-community-can-go-all-electric>.

¹⁵ Erin Skibbens, *U.S. PIRG Education Fund Urges Best Buy To Protect Consumer Health By Promoting Cleaner Cooking*, U.S. PIRG (Feb. 17, 2022), <https://uspirg.org/news/usf/us-pirg-education-fund-urges-best-buy-protect-consumer-health-promoting-cleaner-cooking>.

28. Environment America’s work has included educating consumers on the climate and health impacts of natural gas¹⁶ and authoring guides on how consumers can transition to clean energy homes.¹⁷ Environment America’s “100% Renewable” campaign educates consumers on how to move away from fossil fuels like natural gas and onto truly renewable energy sources.¹⁸

29. Defendant Washington Gas Light Company is a privately held company headquartered in Washington D.C. It is a subsidiary of WGL Holdings, Inc., which was acquired by the Canadian energy company AltaGas Ltd. in 2018. Defendant was and is, at all relevant times, engaged in commercial transactions throughout the District of Columbia.

30. Defendant Washington Gas Light Company markets and sells its products and services in the District of Columbia and throughout the United States.

31. Upon information and belief, Washington Gas has caused harm to the general public of the District of Columbia.

32. Plaintiffs are acting on behalf of themselves and for the benefit of the general public and D.C. consumers as a private attorney general pursuant to D.C. Code § 28-3905(k)(1). Plaintiffs are public-interest organizations pursuant to D.C. Code § 28-3901(a)(15).

FACT ALLEGATIONS

33. Plaintiffs bring this suit for injunctive and declaratory relief under the CPPA against Washington Gas, based on misrepresentations and omissions committed by the company regarding its products and business practices, which Washington Gas represents as “clean” and sustainable.

¹⁶ *E.g.* Dutzik, *supra* note 12.; Eve Lukens-Day, *Are gas stoves bad for the climate?*, Environment America, (Feb. 9, 2022), <https://environmentamerica.org/blogs/environment-america-blog/amc/are-gas-stoves-bad-climate>.

¹⁷ *E.g.*, *Ten Ways Your Community Can Go All-Electric*, *supra* note 14.

¹⁸ Our Campaigns, *100% Renewable*, Environment America, <https://environmentamerica.center.org/feature/amc/100-renewable-0> (last visited Jul. 25, 2022).

34. Defendant’s marketing is false and deceptive because the use, production, and supply of natural gas—and of the gas supplied by Defendant in particular—is neither “clean” nor sustainable.

35. Defendant knows that consumers increasingly and consciously seek out products and services from environmentally responsible companies.

36. Accordingly, Washington Gas cultivates an image of creating responsible energy solutions for consumers who wish to avoid harm to our planet in order to motivate climate-concerned consumers to continue to purchase their products and services.

I. Washington Gas Portrays Its Natural Gas Business as “Clean” and Sustainable.

37. Washington Gas operates as both a utility and supplier of natural gas in Washington D.C. As Defendant’s parent company states: “[p]roviding natural gas service is the foundation of WGL.”¹⁹

38. At the same time, Washington Gas purports to be an environmentally conscious company that is committed to providing “clean” and sustainable energy.

39. As part of its efforts to keep consumers from switching to electricity,²⁰ Washington Gas makes these statements direct to consumers, including prominently on the monthly bills that the company sends to each consumer. In the lower-left corner of its bills, Washington Gas includes a colorful picture of flowers, with text describing natural gas as “clean” and as a “smart choice for the environment”:

Natural gas is a clean, efficient, and reliable energy. Converting an all electric home to natural gas is the equivalent of planting 2.75 acres of trees or driving 26,520

¹⁹ *Customer Solutions: Natural Gas*, Washington Gas Light, <https://sustainability.wglholdings.com/customer-solutions/natural-gas/> (last visited Jul. 26, 2022).

²⁰ *See, e.g., Full Fuel Cycle*, Washington Gas, <https://www.washingtongas.com/safety-education/education/full-fuel-cycle> (last visited Jul. 26, 2022).

fewer miles each year. In addition, natural gas cost 1/3 less than electric, which makes it a smart decision for the environment and your wallet.



Page 1 of 2

Gas Bill

Because you pay by Auto Pay Plan you do not have to do anything.
Your next payment of [REDACTED] is due to be collected on May 2, 2022

Thanks for being a valuable customer of Washington Gas. Your next meter reading date is May 5, 2022.


Account number: [REDACTED]


Bill date: April 8, 2022

Period: Mar 5, 2022-Apr 6, 2022 (33 days)


Service address: [REDACTED]

Questions?

 washingtongas.com

 844-WASHGAS (844-827-4427)

Mon: 8am-8pm, Tue-Fri: 8am-6pm, Sat: 8am-12pm

 Washington Gas Customer Care

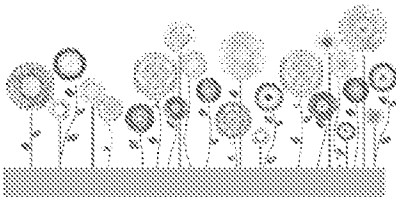
6801 Industrial Road

Springfield VA 22151-4294

Did you know?

Natural gas is a clean, efficient, and reliable energy. Converting an all electric home to natural gas is the equivalent of planting 2.75 acres of trees or driving 26,520 fewer miles each year. In addition, natural gas cost 1/3 less than electric, which makes it a smart decision for the environment and your wallet.

Natural Gas. *Efficient by Nature*



Need to change your information?
If you've changed your mailing address or other personal details call us on 844-WASHGAS

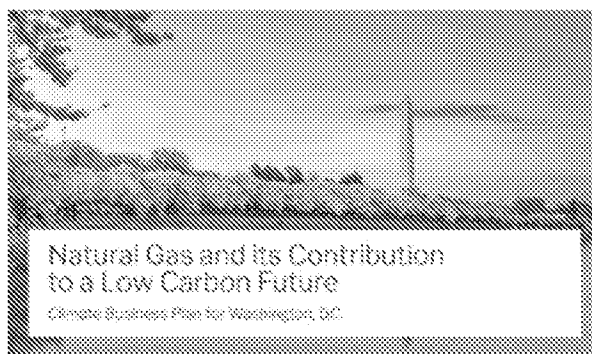
40. Washington Gas echoes these claims on its website, where its “About Natural Gas” page includes a “Facts About Natural Gas” box, telling consumers that natural gas is the “*cleanest*” fossil fuel on the market today.”²¹

²¹ *About Natural Gas*, Washington Gas, <https://www.washingtongas.com/safety-education/education/about-natural-gas> (emphasis added) (last visited Jul. 26, 2022).

41. In its “Natural Gas 101” handbook, which it makes available under the “Customer Resources” section of its website,²² Washington Gas tells consumers that natural gas is “clean energy.”²³

42. For consumers who are seriously invested in choosing clean energy, Washington Gas’s website invites consumers to “[v]isit our sustainability site,”²⁴ linking to a website that offers additional assurances of this kind, explicitly representing that “[n]atural gas is a clean and efficient way for heating, cooling and powering our built environment.”²⁵

43. This “sustainability site” prominently touts a “science-based plan to meet DC’s climate goals.”²⁶



APRIL 21, 2022

OUR SCIENCE-BASED PLAN TO MEET DC'S CLIMATE GOALS

Washington Gas Climate Business Plan cuts emissions in half by 2032; carbon neutral by 2050.

[Read the Plan](#) | [Analysis Behind the Plan](#)

²² *Customer Resources*, Washington Gas, <https://www.washingtongas.com/my-account/account-services-support/customer-resources> (last visited Jul. 26, 2022).

²³ *Natural Gas 101*, Washington Gas, <https://washingtongas.dcatalog.com/v/Natural-Gas-101/> (last visited Jul. 26, 2022).

²⁴ *Sustainability at WGL*, Washington Gas, <https://www.washingtongas.com/media-center/sustainability-at-wgl> (last visited Jul. 26, 2022).

²⁵ *Customer Solutions: Natural Gas*, *supra* note 19.

²⁶ *WGL Sustainability*, Washington Gas Light, <https://sustainability.wglholdings.com> (last visited Jul. 26, 2022).

44. Similarly, in its “Climate Business Plan,” Washington Gas advertises that the use of natural gas is a “key driver” of greenhouse gas reductions in the District.²⁷

45. On its “Sustainability at WGL” webpage, the company makes further representations regarding its general commitment to the environment noting that “our commitment to Sustainability is part of who we are” and “At WGL, we strive to be responsible stewards of the environment”²⁸

Our commitment to Sustainability is part of who we are. At WGL, we strive to be responsible stewards of the environment, be active members of the communities we serve and provide affordable, reliable, modern and clean energy solutions to customers.

46. As part of this narrative, Washington Gas also implies that its natural gas is a carbon-neutral alternative.

47. For example, Washington Gas advertises that natural gas provides a “low carbon” energy that “can help the District reach its carbon neutral status” while spending less than it would “relying solely on electrification to get there.”²⁹

48. Washington Gas advertises that its current production practices are “low carbon,” noting that “Today natural gas provides low carbon energy to fuel highly efficient thermal applications”³⁰

²⁷ *Climate Business Plan*, *supra* note 5.

²⁸ *Sustainability at WGL*, *supra* note 24.

²⁹ WGL, *Learn about the WGL Climate Business Plan - July 2020*, YouTube (May 21, 2021), <https://www.youtube.com/watch?v=uLxXLTD2WaY>.

³⁰ *Climate Business Plan*, *supra* note 5.

II. Natural Gas Is Not an Unqualifiedly “Clean” or Sustainable Form of Energy.

49. Contrary to Defendant’s representations, its natural gas products and services are not “clean” nor sustainable, as its business practices impede the adoption of truly sustainable energy alternatives such as renewables.

A. The Production and Use of Natural Gas is Harmful to the Environment.

50. Natural gas is not “clean.” It is a fossil fuel comprised primarily of methane, a greenhouse gas that has a greater potential of negatively affecting climate change than carbon dioxide over a 20-year period.³¹

51. The extraction, transportation, and use of natural gas releases methane into the atmosphere and the combustion of natural gas to produce energy releases carbon dioxide into the atmosphere.

52. The use of natural gas is not what reasonable consumers would consider “clean,” even if, when burned, it releases less carbon dioxide than coal—especially because it releases far more emissions than alternatives like renewable energy sources would.

53. In fact, according to the EPA, natural gas combustion in residential and commercial sectors (where Defendants operate) accounts for over 7% of the United States’ *total* greenhouse gas emissions.³²

54. Furthermore, the demand for natural gas has led to the proliferation of horizontal drilling and hydraulic fracturing (commonly known as fracking) across the country. Well-publicized scientific studies show that fracking and horizontal drilling leads to pollution of the environment and groundwater and causes health and safety risks for humans.

³¹ See Pachauri, et al., *supra* note 4.

³² *Inventory of United States Greenhouse Gas Emissions and Sinks 1990-2015*, United States Environmental Protection Agency (May 2021), https://www.epa.gov/sites/default/files/2021-04/documents/us-ghg-inventory-2021-main-text.pdf?VersionId=wEy8wQuGrWS8Ef_hSLXHy1kYwKs4.ZaU.

55. For example, a study on fracking in Michigan found that the harmful environmental repercussions of this practice are “significant” and “include increased erosion and sedimentation, increased risk of aquatic contamination from chemical spills or equipment runoff, habitat fragmentation, and reduction of surface waters”³³ Reasonable consumers, therefore, do not associate fracking and horizontal drilling with clean energy.

56. The environmental threats that stem from the use of natural gas extend beyond the harms associated with extraction. Methane and other pollutants are released into the atmosphere when gas is transmitted, when it leaks, and when it is burned in homes and buildings.

57. Methane is also leaking from appliances in homes that use natural gas at a much higher rate than previously known. Research released by Stanford University in January 2022 found that gas stoves leak significant amounts of methane, even when turned off.³⁴ Methane gas leaks from stoves alone cause climate damage equivalent to that of about 500,000 gasoline-powered cars, according to the Stanford study.

58. Finally, when natural gas is burned to heat or cool homes or commercial buildings, to heat water, or to cook, carbon dioxide, carbon monoxide, nitrogen dioxide, particulate matter, and formaldehyde are all released.³⁵ This contributes to climate change and health harming indoor and outdoor air pollution.³⁶

³³*Environmental Impacts of Natural Gas*, Union of Concerned Scientists, (Jun. 19, 2014), <https://www.ucsusa.org/resources/environmental-impacts-natural-gas>.

³⁴ Eric D. Lebel, et al., *Methane and NOx Emissions from Natural Gas Stoves, Cooktops, and Ovens in Residential Homes*, *Environ. Sci. Technol.* 2022, 56, 4, 2529–2539, <https://pubs.acs.org/doi/10.1021/acs.est.1c04707>.

³⁵*Natural gas and the environment*, U.S. Energy Information Administration, (Dec. 8, 2021), <https://www.eia.gov/energyexplained/natural-gas/natural-gas-and-the-environment.php>; Air quality and health, *Around 3 billion people cook and heat their homes using polluting fuels*, World Health Organization, <https://www.who.int/teams/environment-climate-change-and-health/air-quality-and-health/health-impacts/types-of-pollutants> (last visited Jul. 26, 2022).

³⁶ Brady Seals, et al., *Gas Stoves: Health and Air Quality Impacts and Solutions*, RMI, (2020), <https://rmi.org/insight/gas-stoves-pollution-health>.

B. Natural Gas Is Not a Clean Fuel, And Its Use Must be Curtailed to Meet Sustainable Climate Targets.

59. Washington Gas’s portrayal of its natural gas products and services as a “key driver” of lowering GHG emissions in the District, and its statement that “converting an all electric home to natural gas” reduces emissions, are false and misleading.

60. The front page of the “Sustainability” website to which Washington Gas directs consumers³⁷ touts “a science-based plan to meet DC’s climate goals.”³⁸ But the DC government has directly disavowed this plan, criticizing it as inconsistent with the District’s goals.

61. Importantly, though the Clean Energy DC plan prioritizes “[e]lectrification where possible and switching to lower-carbon fuels otherwise,”³⁹ Defendant’s plan is not focused on electrification or implementation of renewable energy like wind and solar, but instead on renewable natural gas (“RNG”), hydrogen, emerging technologies and offsets. The D.C. Department of Energy and Environment has criticized this plan as representing “business as usual” and as being inconsistent with the District’s goals of moving toward clean energy, noting that the plan is out of step with the recommendations of scientific authorities like the Intergovernmental Panel on Climate Change, which universally emphasize the importance of electrification to decarbonization.⁴⁰

62. Further, Washington Gas’s proposed plan to address climate change and the District’s environmental goals is “Fuel Neutral Decarbonization.”⁴¹ RNG represents the largest percentage of planned emissions reductions over time in Washington Gas’s plan, and Washington

³⁷ *Sustainability at WGL*, *supra* note 24.

³⁸ *WGL Sustainability*, *supra* note 26.

³⁹ *Clean Energy Dc: The District Of Columbia Climate And Energy Action Plan*, D.C. Dep’t of Energy & Environ. (“DOEE”), (Aug. 2018), https://doee.dc.gov/sites/default/files/dc/sites/ddoe/page_content/attachments/Clean%20Energy%20DC%20-%20Full%20Report_0.pdf.

⁴⁰ *Comments by the Department of Energy and Environment on behalf of the District of Columbia Government Concerning AltaGas Ltd.’s Climate Business Plan*, DOEE., Formal Case No. 1142 (June 26, 2020).

⁴¹ *Climate Business Plan*, *supra* note 5.

Gas refers to RNG as a “zero carbon fuel.” However, according to the World Resources Institute (“WRI”), “[RNG] production and use may not always lead to large GHG emissions reductions,” and “[i]n some contexts, RNG could lead to a net increase in methane emissions.”⁴²

63. Numerous studies and projections have demonstrated that if countries around the world, including the United States, want to achieve carbon neutrality and mitigate their greenhouse gas emissions, natural gas use must be significantly curtailed, and alternative renewable energy sources adopted in its place.

64. For example, a 2020 study by Princeton University on the mechanisms through which the United States could reach net zero by 2050 found that—in any of its projected scenarios—natural gas production would have to decline by 25-85%.⁴³

65. The study also indicated that in residential buildings, where Washington Gas does a significant portion of its business,⁴⁴ “the use of natural gas . . . [must be] nearly fully replaced by electricity by 2050 across the net-zero transitions”⁴⁵.

66. These findings mirror those found in global studies such as the International Energy Agency’s (the “IEA”) *Net Zero by 2050* roadmap.

⁴²Rebecca Gasper, *The Production And Use Of Renewable Natural Gas As A Climate Strategy In The United States*, WRI, (Apr. 2018), [production-use-renewable-natural-gas-climate-strategy-united-states.pdf](https://www.wri.org/publications/production-use-renewable-natural-gas-climate-strategy-united-states.pdf) (wri.org).

⁴³ Eric Larson *et al.*, *Net Zero America: Potential Pathways, Infrastructure, and Impacts*, Princeton University, (Dec. 15, 2020), https://environmenthalfcentury.princeton.edu/sites/g/files/toruqf331/files/2020-12/Princeton_NZA_Interim_Report_15_Dec_2020_FINAL.pdf.

⁴⁴ See *e.g.*, *Washington Gas Light: Form 10-K*, SEC, (Fiscal Year 2020), <http://www.wglholdings.com/static-files/2aed29da-796f-4acc-ae06-68925f011a2d>, (“Washington Gas’ business is weather-sensitive and seasonal because the majority of its business is derived from residential and small commercial customers who use natural gas for space heating”).

⁴⁵ *Net Zero America*, *supra* note 43.

67. The IEA noted that to achieve net zero goals, a comprehensive switch from all fossil fuels (including natural gas) must be made. According to the roadmap, by 2050 “[i]nstead of fossil fuels, the energy sector [must be] based largely on renewable energy.”⁴⁶

68. Specifically, in household settings, the IEA projected that natural gas use for heating in commercial and residential buildings would need to drop by 98%.⁴⁷

69. This robust body of scientific research on the necessity of moving to renewable energy sources and the need to lessen reliance on natural gas counters the narrative advanced by Washington Gas that its natural gas products and services are a necessary and sustainable form of energy.

70. In fact, as these reports point out, the use of natural gas is antithetical to reaching sustainability goals across the globe.

C. Washington Gas’s Natural Gas in Particular is Not Clean

71. In addition to generally mischaracterizing natural gas as clean, Washington Gas’s own natural gas products and production are decidedly not “low carbon.” Washington Gas admits that as of 2018, its low-carbon gas supply was *0%* and it only has plans to use 2% low-carbon gas by 2025.⁴⁸ Washington Gas’s disclosure of this fact demonstrates just how misleading their “sustainability” statements to consumers are. Low-carbon gas is not what Washington Gas has to offer, nor do they have a plan to offer it in the near future.

⁴⁶ *Net Zero by 2050: A Roadmap for the Global Energy Sector*, International Energy Agency, (Jun. 2021), https://iea.blob.core.windows.net/assets/405543d2-054d-4cbd-9b89-d174831643a4/NetZeroBy2050-ARoadmapfortheGlobalEnergySector_CORR.pdf.

⁴⁷ *Id.*

⁴⁸ *Climate Business Plan*, *supra* note 5.

72. Even the term “low-carbon gas” can be misleading, as it encompasses gas produced from biogas, biomass, and hydrogen. Biomass, for example, produces a variety of harmful air pollutants when burned.⁴⁹

73. Further, methane sold by Washington Gas accounts for 23% of the District’s total greenhouse gas emissions.⁵⁰ Because gas leaks are approximately double official estimates, emissions from the gas sector are likely much higher.⁵¹

74. Washington Gas is one of only two utilities that has gas lines in Washington D.C.⁵² and a 2014 study found that Washington D.C. had nearly 6,000 pipeline leaks across 1,500 road miles of the city.⁵³ A gas leak study commissioned by the DC government in 2021 identified 3,346 locations with methane at concentrations higher than ambient background levels.⁵⁴ A 2022 study by environmental groups found 389 gas leaks in neighborhoods across the city in just 25 hours of testing.⁵⁵ All of these leaks release methane into the atmosphere and increase the climate and environmental impact of the use of natural gas.⁵⁶

⁴⁹ International Agency for Research on Cancer (IARC) Scientific Publication No. 161: *Air Pollution and Cancer* (e-Book), edited by Kurt Straif, Aaron Cohen, and Jonathan Samet, (Oct. 7, 2013), *see* Chapter 4: Combustion Emissions, <https://www.iarc.who.int/news-events/iarc-scientific-publication-no-161-air-pollution-and-cancer-as-an-e-book/>.

⁵⁰ Greenhouse Gas Inventories, DOEE, <https://doee.dc.gov/service/greenhouse-gas-inventories> (last visited Jul. 26, 2022).

⁵¹ Ramón A. Alvarez, *Assessment of methane emissions from the U.S. oil and gas supply chain*, 361 *Science* 6398, 186-188 (Jun. 21, 2018), <https://www.science.org/doi/10.1126/science.aar7204>

⁵² *Third Party Suppliers*, Office of the People’s Counsel, (June 22, 2021), <https://opc-dc.gov/consumer-assistance/utilities/third-party-suppliers-tps>

⁵³ Robert B. Jackson, Adrian Down, Nathan G. Phillips, Robert C. Ackley, Charles W. Cook, Desiree L. Plata, and Kaiguang Zhao, *Natural Gas Pipeline Leaks Across Washington, DC*, 48 *Environ. Sci. Technol.* 2051, 2051 (2014), DOI: 10.1021/es404474x.

⁵⁴ Bob Ackley, *2021 Fugitive Methane Emission Survey of the District of Columbia*, DOEE, (Oct. 31, 2021), <https://edocket.dcpso.org/apis/api/Filing/download?attachId=143587&guidFileName=d93076fd-4fbd-4537-9947-27db2f19f967.pdf>.

⁵⁵ *Neighborhood Researchers Find Hundreds of Methane Gas Leaks Across DC*, Sierra Club, (Feb. 23, 2022), <https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u6902/Methane-Leaks-Across-DC.pdf>

⁵⁶ Benjamin Storrow, *Methane Leaks Erase Some of the Climate Benefits of Natural Gas*, *Scientific American* (May 5, 2020), <https://www.scientificamerican.com/article/methane-leaks-erase-some-of-the-climate-benefits-of-natural-gas/>.

III. Washington Gas's Representations are Material and Misleading to Consumers.

75. Defendant's false and misleading representations about the degree to which its natural gas business is "clean" and sustainable are material to consumers.

76. Consumers care deeply about environmental issues and are more likely to purchase products and services that they perceive as environmentally friendly.⁵⁷

77. A 2019 study conducted by Coleman Parkes Research on behalf of Accenture surveyed 1,500 consumers in seventeen cities throughout the United States. Forty-seven percent of consumers surveyed expressed a desire to conduct business with retailers that were environmentally conscious.⁵⁸

78. The desire for sustainable products and services is especially pronounced among younger consumers; a study from the International Trademark Association from 2018 found that 89 percent of internet users ages 18 to 23 felt that brands should aim to do good in the world.⁵⁹

79. Washington Gas's business practices fall far short of what consumers would expect from a sustainable company providing "clean" fuel. Its advertising strategies mislead consumers into believing that Washington Gas prioritizes environmental health, capturing a growing class of consumers who wish to support environmentally sustainable companies.

80. Moreover, federal guidance and consumer research show that Defendant's sustainability representations suggest to consumers that its products are made and sourced in accordance with high environmental standards.

⁵⁷ *The Sustainability Imperative*, *supra* note 1.

⁵⁸ Lucy Koch, *Sustainability Is Factoring into 2019 Holiday Purchases*, eMarketer (Oct. 14, 2019), https://www.emarketer.com/content/sustainability-is-factoring-into-2019-holiday-purchases?_ga=2.170357734.731468461.1617378067-462530432.1615825431.

⁵⁹ *Id.*

81. The Federal Trade Commission (“FTC”) has determined that unqualified general environmental benefit/sustainability claims “imply certain specific environmental benefits.”⁶⁰ For example, the FTC has admonished companies not to use unqualified claims such as “sustainable” due to its determination that “it is highly unlikely that they can substantiate all reasonable interpretations of these claims.”⁶¹

82. Indeed, as demonstrated *supra* Section II, Defendant is unable to substantiate its claim that it is a sustainable company dedicated to providing “clean” or “low carbon” fuel, thereby misleading the many consumers who attempt to make purchasing decisions in line with their desire to be more environmentally conscious.

83. Lastly, as evidenced in Section II.B, *supra*, scientific and policy determinations across the globe have shown that achieving sustainability and net zero goals in the energy sector will require a significant reduction in natural gas use and a concerted transition to alternative renewable sources.

84. Thus, Defendant’s portrayal of its natural gas products and services as clean and sustainable, and as aiding in the clean energy transition, is inherently misleading given that natural gas use will need to be significantly reduced to achieve meaningful greenhouse gas emission reductions and sustainability goals.

JURISDICTION AND VENUE

85. This Court has personal jurisdiction over the parties in this case. Plaintiffs, by filing this Complaint, consent to this Court having personal jurisdiction over them. Plaintiffs U.S. PIRG Education Fund and Environment America Research & Policy Center maintain offices and many

⁶⁰ *FTC Sends Warning Letters to Companies Regarding Diamond Ad Disclosures*, Federal Trade Commission (Apr. 2, 2019), <https://www.ftc.gov/news-events/press-releases/2019/03/ftc-sends-warning-letters-companies-regarding-diamond-ad>; *see also* FTC Green Guides, 16 C.F.R. § 260.4(b) (2012).

⁶¹ *Id.*

staff members in the District.

86. This Court has personal jurisdiction over Defendant Washington Gas pursuant to D.C. Code § 13-423. Defendant has sufficient minimum contacts with the District of Columbia to establish personal jurisdiction of this Court over it because, *inter alia*, Washington Gas is headquartered in Washington D.C. and is engaged in deceptive schemes and acts directed at persons residing in, located in, or doing business in the District of Columbia, or otherwise purposefully avails itself of the laws of this District through its marketing and sales of its products and services in this District.

87. This Court has subject matter jurisdiction over this action pursuant to D.C. Code §§ 28-3905(k)(1)(B), (k)(1)(D), and (k)(2).

CAUSE OF ACTION

Violations of The District of Columbia Consumer Protection Procedures Act

88. Pursuant to D.C. Code §§ 28-3905(k)(1) and 28-3905(k)(2), Plaintiffs bring this Count against Washington Gas on behalf of the general public, *i.e.*, D.C. consumers who purchase natural gas and may be targeted by Defendant's marketing claims, for Washington Gas's violation of the CPPA, D.C. Code § 28-3901, *et seq.*

89. Plaintiffs incorporate by reference all the allegations in the preceding paragraphs of this Complaint.

90. Washington Gas represents itself as a sustainable and clean company while significantly contributing to greenhouse gas emissions and the environmental harms that accompany natural gas production and use.

91. Defendant's advertising misrepresents, tends to mislead, and omits facts regarding the characteristics, standard, quality, and grade of their business practices and the products and

services they sell.

92. Washington Gas's products, services, and business practices lack the characteristics, benefits, standards, qualities, or grades that Defendant states and implies in its advertisements.

93. Defendant knowingly did not sell its products and services as advertised.

94. The facts, as alleged above, demonstrate that Washington Gas has violated the CPPA, D.C. Code § 28-3901 *et seq.* Specifically, Washington Gas has violated D.C. Code § 28-3904, which makes it an unlawful trade practice to:

- (a) represent that goods or services have a source, sponsorship, approval, certification, accessories, characteristics, ingredients, uses, benefits, or quantities that they do not have; . . .
- (d) represent that goods or services are of particular standard, quality, grade, style, or model, if in fact they are of another;
- (e) misrepresent as to a material fact which has a tendency to mislead; . . .
- (f) fail to state a material fact if such failure tends to mislead;
- (f-1) [u]se innuendo or ambiguity as to a material fact, which has a tendency to mislead; . . . [or]
- (h) advertise or offer goods or services without the intent to sell them or without the intent to sell them as advertised or offered.

95. The CPPA makes such conduct an unlawful trade practice “whether or not any consumer is in fact misled, deceived or damaged thereby.” D.C. Code § 28-3904.

96. Plaintiffs need not show proof of deception to succeed on its CPPA claim; nevertheless, upon information and belief, consumers were, in fact, deceived.

97. Plaintiffs have sufficient nexus to the consumers of and Washington Gas's products and services to adequately represent those interests.

98. Because Defendant misrepresents the characteristics and benefits of the products it provides; misrepresents the standard, quality, and grade of the products; and advertises its products and services without the intent to provide them as advertised, Washington Gas's marketing of their services violates D.C. Code §§ 28-3904(a), (d), (e), (f), (f-1), and (h).

99. Washington Gas is a "person" within the meaning of D.C. Code § 28-3901(a)(1), a merchant under § 28-3901(a)(3), and provides "goods and services" within the meaning of § 28-3901(a)(7).

100. Any consumer has the right to bring an action for redress of Washington Gas's unlawful behavior, *see* D.C. Code § 28-3905(k)(1)(A), and the statute does not limit consumer plaintiffs according to whether they purchased the product at issue. Nevertheless, as alleged in this Complaint, the natural gas products and services are marketed and provided in the District, and consumers within the District have obtained these products under the misrepresentations made by Defendant. Therefore, a variety of purchasing and non-purchasing consumers could bring an action against Washington Gas based on the misrepresentations and omissions listed in this Complaint.

101. Pursuant to D.C. Code § 28-3905(k)(1)(D)(i), "a public interest organization may, on behalf of the interests of a consumer or a class of consumers, bring an action seeking relief from the use by any person of a trade practice in violation of a law of the District if the consumer or class could bring an action under subparagraph (A) of this paragraph for relief from such use by such person of such trade practice."

102. The only limitation on this power of a public interest organization to act on behalf of consumers is that the public interest organization must have "sufficient nexus to the interests

involved of the consumer or class to adequately represent those interests.” D.C. Code § 28-3905(k)(1)(D)(ii). As set forth in this Complaint, *see supra* ¶¶ 22-28, Plaintiffs aim to advocate for and educate the general population, including consumers in the District of Columbia, in the arenas of environmental health, climate change, and pollution. In addition, Plaintiffs have retained the undersigned competent counsel, who have significant experience in litigating under the CPPA, to pursue this action.

103. Via § 28-3905(k)(1)(D)(i), the CPPA allows for public interest organizational standing to the fullest extent recognized by the D.C. Court of Appeals in its past and future decisions, “beyond” the limits of constitutional standing under Article III. *See Animal Legal Def. Fund v. Hormel Foods Corp.*, 258 A.3d 174, 184-86 (D.C. 2021).

104. Plaintiffs are each a “person” within the meaning of D.C. Code § 28-3901(a)(1) and a “public interest organization” within the meaning of D.C. Code § 28-3901(a)(15).

PRAYER FOR RELIEF

Wherefore, Plaintiffs pray for judgment against Defendant Washington Gas, and requests the following relief:

- A. a declaration that Washington Gas’s conduct is in violation of the CPPA;
 - B. an order enjoining Washington Gas’s conduct found to be in violation of the CPPA;
- and
- C. an order granting Plaintiffs costs and disbursements, including reasonable attorneys’ fees and expert fees, and prejudgment interest at the maximum rate allowable by law.

JURY TRIAL DEMANDED

Plaintiffs hereby demands a trial by jury.

DATED: July 28, 2022

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kim E. Richman". The signature is fluid and cursive, with the first name "Kim" and last name "Richman" being the most legible parts.

Kim E. Richman (Bar No. 1022978)

Richman Law & Policy

1 Bridge Street, Ste. 83

Irvington, NY 10533

Telephone: (212) 687-8291

Facsimile: (212) 687-8292

krichman@richmanlawpolicy.com

Attorneys for Plaintiffs

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

CLIENT EARTH, U.S. PIRG EDUCATION
 FUND, & ENVIRONMENT AMERICA
 RESEARCH & POLICY CENTER, _____

INFORMATION SHEET

Case Number: _____

vs

Date: July 28, 2022

WASHINGTON GAS LIGHT COMPANY _____

One of the defendants is being sued
 in their official capacity.

Name: <i>(Please Print)</i> Kim E. Richman	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff
Firm Name: Richman Law & Policy	<input type="checkbox"/> Self (Pro Se)
Telephone No.: Six digit Unified Bar No.: (212) 687-8291 1022978	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$ _____ Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar#: _____

NATURE OF SUIT: (Check One Box Only)

A. CONTRACTS

COLLECTION CASES

- | | | |
|---|--|--|
| <input type="checkbox"/> 01 Breach of Contract
<input type="checkbox"/> 02 Breach of Warranty
<input type="checkbox"/> 06 Negotiable Instrument
<input type="checkbox"/> 07 Personal Property
<input type="checkbox"/> 13 Employment Discrimination
<input type="checkbox"/> 15 Special Education Fees | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent
<input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent
<input type="checkbox"/> 27 Insurance/Subrogation
Over \$25,000 Pltf. Grants Consent
<input type="checkbox"/> 07 Insurance/Subrogation
Under \$25,000 Pltf. Grants Consent
<input type="checkbox"/> 28 Motion to Confirm Arbitration
Award (Collection Cases Only) | <input type="checkbox"/> 16 Under \$25,000 Consent Denied
<input type="checkbox"/> 18 OVER \$25,000 Consent Denied
<input type="checkbox"/> 26 Insurance/Subrogation
Over \$25,000 Consent Denied
<input type="checkbox"/> 34 Insurance/Subrogation
Under \$25,000 Consent Denied |
|---|--|--|

B. PROPERTY TORTS

- | | | |
|---|--|--------------------------------------|
| <input type="checkbox"/> 01 Automobile
<input type="checkbox"/> 02 Conversion
<input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) | <input type="checkbox"/> 03 Destruction of Private Property
<input type="checkbox"/> 04 Property Damage | <input type="checkbox"/> 05 Trespass |
|---|--|--------------------------------------|

C. PERSONAL TORTS

- | | | |
|---|--|--|
| <input type="checkbox"/> 01 Abuse of Process
<input type="checkbox"/> 02 Alienation of Affection
<input type="checkbox"/> 03 Assault and Battery
<input type="checkbox"/> 04 Automobile- Personal Injury
<input checked="" type="checkbox"/> 05 Deceit (Misrepresentation)
<input type="checkbox"/> 06 False Accusation
<input type="checkbox"/> 07 False Arrest
<input type="checkbox"/> 08 Fraud | <input type="checkbox"/> 10 Invasion of Privacy
<input type="checkbox"/> 11 Libel and Slander
<input type="checkbox"/> 12 Malicious Interference
<input type="checkbox"/> 13 Malicious Prosecution
<input type="checkbox"/> 14 Malpractice Legal
<input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death)
<input type="checkbox"/> 16 Negligence- (Not Automobile,
Not Malpractice) | <input type="checkbox"/> 17 Personal Injury- (Not Automobile,
Not Malpractice)
<input type="checkbox"/> 18 Wrongful Death (Not Malpractice)
<input type="checkbox"/> 19 Wrongful Eviction
<input type="checkbox"/> 20 Friendly Suit
<input type="checkbox"/> 21 Asbestos
<input type="checkbox"/> 22 Toxic/Mass Torts
<input type="checkbox"/> 23 Tobacco
<input type="checkbox"/> 24 Lead Paint |
|---|--|--|

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |



Attorney's Signature

7/28/22

Date