

# Exhibit A



City of Philadelphia  
LIFE LIBERTY AND YOU

Topics Businesses Residents Visitors Government



### 1916 CLARENCE ST PHILADELPHIA, PA

CASE NUMBER  
560154

CASE GROUP  
CE-HOUSING CODE ENFORCEMENT

CASE LOCATION  
N/A

DATE ADDED  
October 19, 2016

DATE UPDATED  
October 17, 2016

STATUS  
OPEN

RESOLUTION DATE (CONTACT YOUR BUILDING DISTRICT OFFICE IF A RESOLUTION DATE DOES NOT APPEAR)  
N/A

PRIORITY  
HAZARD

#### VIOLATIONS

VIOLATION CODE	VIOLATION TYPE	VIOLATION DATE	STATUS	LOCATION
PM15-109.1	UNFIT STRUCTURE	October 16, 2016	Not Complied	no heat
PM15-602.2	MECH AND ELEC - HEATING RESID	October 16, 2016	Not Complied	repair heater

Topics	People We Serve	Government	Contact
Arts & Culture	Businesses	Mayor's Office	311
Education	Residents	City Council	Phone Directory
Employment	Visitors	Courts	Language Assistance
Environment		District Attorney	
Health		Sheriff	
Housing			
Neighborhoods			
Public Safety			
Recreation			
Transportation & Utilities			
Urban Development			

Technical Problems: [webissues@phila.gov](mailto:webissues@phila.gov) | HIPAA | Privacy Policy | Right to Know Policy | Terms of Use

215686276  
 1401 JFK Blvd  
 Philadelphia PA 19102

Commission on Human Relations

11:11:09 a.m. 11-16-2016

3/4

**Case Inspection Detail**

Report Date 11/16/2016 10:43 AM Submitted By Page 1

Inspection # 3566524 A/P # 560154 Insp Type HCEU INSPE-HOUSING CODE ENFORCE INSP # 2

**Property Information**

Address 01916 CLARENCE ST 0060000  
 PHILADELPHIA PA 19134-2017  
 Location

**Application Information**

Type CD ENFORCE CODE ENFORCEMENT UNITS Priority H A/P Name  
 Desc of Case no heat

**Initial Inspection**

Call Date/Time  System Generated Assigned To 204662  
 Schedule Date/Time 10/31/2016 10:16 Order/Group 0 Preference  
 Waived  
 Location

**Inspection Results**

Inspected by Same Trip as Insp # 0  
 Start Date/Time Odometer Start 0  
 Completed Date/Time Odometer Stop 0  
 Partial Inspection  
 Status No Action

**Comments**

No Comments

**Code Violations**

Violation PM15-109.1 Description UNFIT STRUCTURE  
 Violation Date 10/17/2016 Status Status Date  
 Location no heat  
 Comments repair or replace heater  
 Code Violation Text The Department has deemed the structure referenced in this order Unfit. A structure is unfit for human occupancy whenever the code official finds that such structure is unsafe, unlawful or, because of the degree to which the structure is in disrepair or lacks maintenance, is unsanitary, vermin or rat infested, contains filth and contamination, or lacks ventilation, illumination, sanitary or heating facilities or other essential equipment required by this code, or because the location of the structure constitutes a hazard to the occupants of the structure or to the public. The owner shall be prohibited from admitting any new tenants to any tenant space within such dwelling for the duration of such unfit designation PM-109

Violation PM15-602.2 Description MECH AND ELEC - HEATING RESID  
 Violation Date 10/17/2016 Status Status Date  
 Location repair heater  
 Comments  
 Code Violation Text DWELLINGS SHALL BE PROVIDED WITH HEATING FACILITIES CAPABLE OF MAINTAINING A ROOM TEMPERATURE OF 68°F (20°C) IN ALL HABITABLE ROOMS, BATHROOMS AND TOILET ROOMS. COOKING APPLIANCES SHALL NOT BE USED TO PROVIDE SPACE HEATING TO MEET THE REQUIREMENTS OF THIS SECTION. PM-602.2

# Exhibit B



*LEVYLAW LLC*

Bart Elliott Levy, Counselor at Law  
1515 Market Street, Suite 950, Philadelphia, PA 19102

---

November 7, 2016

**Gerrell Martin & Curtis Sampson  
And all Occupants  
1916 Clarence Street  
Philadelphia, PA 19134**

**Re: Lease:  
1916 Clarence Street, Philadelphia, PA 19134**

**Dear Ms./Mr. Martin & Sampson,**

Please be advised that I represent the owner of the premises in which you currently reside. Your right to possession under the lease is in jeopardy due breaches in your lease. Your Landlord has decided to file suit in Landlord/Tenant court in the amount of your arrearage totaling in:

**\$2,900** amount includes unpaid rent, late fees, legal fees, and any other expenses you are responsible for per your lease. Pursuant to the above, you must vacate the premises and deliver possession to the owner twenty (20) days from the date of this letter. In addition, you are responsible for the payment of any expenses my client may incur in connection with the attempted re-rental of this unit, including but not limited to rental commission, and any and all physical damage to the unit, which may have been caused during the period of your tenancy.

This is an attempt to collect a debt. Accordingly, any information obtained will be used for that purpose. Unless you notify this office within twenty (20) days after receiving this notice that dispute the validity of the debt or any portion thereof, this office will assume the debt is valid. If you notify this office in writing within twenty (20) days from receiving this notice that the debt, or any portion thereof, is disputed, this office will obtain verification of the debt and mail it to you. This twenty (20) day right to dispute the validity of the debt does not mean we cannot file a Landlord & Tenant complaint or take another action against you within the twenty (20) day period. However, if you dispute the validity of the debt in writing within twenty (20) days, we will not proceed with such action until we send the verification to you.

Best regards,

Bart Levy, Esquire.

# Exhibit C



**PHILADELPHIA MUNICIPAL COURT  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107  
Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

**LANDLORD AND TENANT COMPLAINT**

Date Filed: 11/08/2016

# LT-16-11-08-3756

ARGENTINA PEREZ IRINEO  
1515 MARKET STREET SUITE 950  
PHILADELPHIA, PA 19102

GERRELL MARTIN, AKA/DBA: AND ALL OCCUPANTS  
1916 CLARENCE STREET  
PHILADELPHIA, PA 19134

CURTIS SAMPSON, AKA/DBA: AND ALL OCCUPANTS  
1916 CLARENCE STREET  
PHILADELPHIA, PA 19134

*Plaintiff(s)**Defendant(s)*

- I. Plaintiff states that he/she/it owns the real property located at the following address: [1916 CLARENCE STREET, PHILADELPHIA, PA 19134](#). Plaintiff further states that there is a lease between him/her/it and the above-referenced defendant(s). The lease is [written, attached](#) and began on [06/01/2016](#) for the term of [a year or more](#). Additionally, plaintiff states that the lease is [residential](#).
- II. Plaintiff states that he/she/it is [in compliance](#) with Section 102.1 of the Philadelphia Property Maintenance Code by having a valid housing inspection license at the time of filing. [A copy of the license is attached](#).
- III. Plaintiff states that he/she/it is [in compliance](#) with Section 102.8 of the Philadelphia Property Maintenance Code by having a business privilege license at the time of filing. [A copy of the license is attached](#).
- IV. Plaintiff states that the subject premises is [fit](#) for its intended purpose.
- Plaintiff states that he/she/it is [unaware](#) of any open notice issued by the Department of Licenses and Inspections ("Department") alleging that the property at issue is in violation of one or more provisions of the Philadelphia Code.
- V. Plaintiff states that notice to vacate the subject premises by [11/27/2016](#) was given to the defendant on [11/07/2016](#). A copy of the notice is attached.
- VI. The defendant is [in possession of the property and refuses to surrender possession of the property](#).
- VII. Plaintiff demands [a judgment of possession](#) and a [money judgment](#) in the amount itemized below based on Non Payment of amounts due under the lease.

The amount of unpaid rent below and late fees alleged due.				Summarized alleged amounts due:	
Month	Year	Rent	Late Fee		
Sep.	2016	\$750	\$50	Rent	\$2,250.00
Oct.	2016	\$750	\$50	Late Fees	\$150.00
Nov.	2016	\$750	\$50	Gas	\$0.00
				Electric	\$0.00
				Water / Sewer	\$0.00
				Attorney's Fees	\$500.00
				Other	\$0.00
				<b>Subtotal</b>	\$2,900.00
				Court Costs	\$122.50
				<b>Total</b>	\$3,022.50

<b>Filing Party:</b> BART ELLIOTT LEVY 1515 MARKET STREET, SUITE 950, PHILADELPHIA, PA 19102		<b>Phone Number:</b> (267) 687-8000
I am an attorney for the plaintiff(s), the plaintiff's authorized representative or have a power of attorney for the plaintiff(s) in this landlord tenant action. I hereby verify that I am authorized to make this verification; that I have sufficient knowledge, information and belief to take this verification or have gained sufficient knowledge, information and belief from communications with the plaintiff or the persons listed below and that the facts set forth are true and correct to the best of my knowledge, information and belief. I understand that this verification is made subject to the penalties set forth in 18 Pa. C.S. § 4904, which concerns the making of unsworn falsifications to authorities. If I am an authorized representative or have a power of attorney, I have attached a completed Philadelphia Municipal Court authorized representative form or a completed power of attorney form.  BART ELLIOTT LEVY  _____ Signature Plaintiff/Attorney	<b>SUMMONS TO THE DEFENDANT:</b> You are hereby ordered to appear at a hearing scheduled as follows:	<b>CITATION:</b> Al demandado por la presente, usted esta dirigido a presentarse a la siguiente:
	<b>LOCATION (SITO):</b> 1339 Chestnut Street 6th Floor Philadelphia, PA 19107 Hearing Room: 3	<b>DATE (FECHA):</b> December 7th, 2016  <b>TIME (HORA):</b> 08:45 AM
<b>NOTICE TO THE DEFENDANT: YOU HAVE BEEN SUED IN COURT. PLEASE SEE ATTACHED NOTICE.</b>	<b>NOTA IMPORTANTE PARA EL ACUSADO: USTED HA SIDO DEMANDO EN CORTE: POR FAVOR MIRA PAPELE ESCRITA.</b>	



**PHILADELPHIA MUNICIPAL COURT  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107  
Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

**LANDLORD AND TENANT COMPLAINT**

Date Filed: 11/08/2016

# LT-16-11-08-3756

Complaint Continuation

ONGOING RENT IN THE AMOUNT OF \$750.00 FROM THE DATE OF THE FILING OF THIS COMPLAINT TO THE DATE OF THE HEARING ON THE MERITS IN THIS MATTER.



# Exhibit D



CITY OF PHILADELPHIA  
DEPARTMENT OF LICENSES AND INSPECTIONS

Code Enforcement Unit  
Housing Division  
1401 JFK Blvd.  
11th Floor, Suite 1130  
Philadelphia, PA 19102

**VIOLATION NOTICE**

IRINEO ARGENTINA PEREZ  
6282 KINDRED ST  
PHILADELPHIA PA 19149

**Case No:** 560154  
**Date of Notice:** 10/17/16

**Subject Premises:** 1916 CLARENCE ST  
**Inspection Type:** HOUSING CODE ENFORCE INSP # 1

This is to inform you that the Department of Licenses and Inspections has inspected the subject premises and designated it as **in violation**, in whole or in part, within the meaning of the Philadelphia Code. This designation will remain until the violation(s) below is corrected.

If you fail to comply with this order, the City may take actions to comply with the city code by using its own forces or by contract. You, will be billed for all costs incurred including court and administrative fees. Failure to pay such bill will result in the City filing a lien in the amount against the title to the premises and/or costs and charges being recovered by a civil action brought against you.

If you have any questions regarding this notice, you may call the Code Enforcement Unit at 215-686-2596.

If you intend to appeal this violation, you must apply at Boards Administration, Public Services 11th Floor, Municipal Services Building, 1401 John F. Kennedy Blvd., Philadelphia, PA 19102, within 30 days of the date of this notice. Telephone inquiries concerning appeal process can be directed to 215-686-2427. It is necessary that you submit a copy of this notice with the appeal. (See A-801.2)

**Please Note:** Appeals for Fire Code requirements must be submitted to the Board of Safety and Fire Prevention, 240 Spring Garden Street, Philadelphia, PA 19123, (215) 686-1356.

INSPECTOR COOPER  
Code Enforcement

**VIOLATIONS:**

**Location: no heat  
repair or replace heater**

**The status of this violation is NOT COMPLIED as of 10/17/16.**

**The number of days to comply this violation is 10 days.**

DWELLINGS SHALL BE PROVIDED WITH HEATING FACILITIES CAPABLE OF MAINTAINII A ROOM TEMPERATURE OF 68°F (20°C) IN ALL HABITABLE ROOMS, BATHROOMS AND TOILET ROOMS. COOKING APPLIANCES SHALL NOT BE USED TO PROVIDE SPACE HEATING TO MEET THE REQUIREMENTS OF THIS SECTION. PM-602.2

**Location: repair heater**

**The status of this violation is NOT COMPLIED as of 10/17/16.**



CITY OF PHILADELPHIA  
DEPARTMENT OF LICENSES AND INSPECTIONS

Code Enforcement Unit  
Housing Division  
1401 JFK Blvd.  
11th Floor, Suite 1130  
Philadelphia, PA 19102

**VIOLATION NOTICE**

IRINEO ARGENTINA PEREZ  
6282 KINDRED ST  
PHILADELPHIA PA 19149

**Case No:** 560154  
**Date of Notice:** 10/17/16

**The number of days to comply this violation is 10 days.**

A \$75 fee will be assessed on the third inspection failure doubling with each subsequent failure up to a \$300 fine per inspection.

# Exhibit E



City of Philadelphia  
 Department of  
 Licenses & Inspections  
 P.O. Box 53310  
 Philadelphia, Pa. 19105

**DISPLAY PROMINENTLY**  
 if required by law

ARGENTINA PEREZ IRINEO  
 6282 KINDRED ST  
 PHILADELPHIA, PA 19149  
 USA

3202 Housing Inspection  
 ARGENTINA PEREZ IRINEO  
 1916 CLARENCE ST Philadelphia, PA 19134-2017

Lead Paint Certification : No  
 Number of Units: 1

Lead Paint Certification Agreement: Yes  
 Owner Occupied: No

THIS LICENSE IS GRANTED TO THE PERSON AND LOCATION FOR THE PURPOSE STATED ABOVE. IT IS SUBJECT TO IMMEDIATE CANCELLATION BY THIS DEPARTMENT FOR VIOLATIONS OF CITY ORDINANCES AND REGULATIONS. INQUIRIES 311 (215-686-8686).

LICENSE CODE	LICENSE NO.	COMMERCIAL ACTIVITY LIC.	EXPIRATION DATE	EFFECTIVE DATE
3202	715482	715035	9/30/2017	10/1/2016

The Philadelphia Property Maintenance Code (Section PM-102.6.4) requires an owner offering residential property for rent to provide to the tenant, at the inception of each tenancy, a Certificate of Rental Suitability issued by the Department of Licenses and Inspections no more than sixty (60) days prior to the inception of the tenancy. Visit the Licenses, Permits & Certificates section at [www.phila.gov](http://www.phila.gov) to obtain this required Rental Suitability Certificate.

**LICENSE**

Interpreter services available. [خدمات الترجمة الشفهية متوفرة لدينا] | [ଆମେ ସେବାୟତମାନଙ୍କୁ ପ୍ରଦାନ କରୁଛୁ] | 提供口译服务 | Services d'interprétation disponibles. [통역이 제공됩니다.] | [Se bridas servicios de interpretación.] | Có sẵn dịch vụ thông dịch.