

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL**

**REVIEW OF HOUSING PROVIDER FILINGS AT
THE RENTAL ACCOMMODATIONS AND
CONVERSION DIVISION OF THE
DEPARTMENT OF CONSUMER AND
REGULATORY AFFAIRS**



**CHARLES J. WILLOUGHBY
INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



December 12, 2005

The Honorable Jim Graham, Chair
Committee on Consumer and Regulatory Affairs
Council of the District of Columbia
1350 Pennsylvania Avenue, N.W., Suite 105
Washington, D.C. 20004

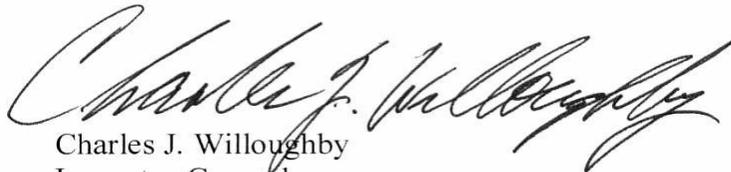
Dear Chairman Graham:

Enclosed is the final report summarizing the results of the Office of the Inspector General's *Review of Housing Provider Filings at the Rental Accommodations and Conversion Division of the Department of Consumer and Regulatory Affairs* (OIG No. 05-2-19CR).

We performed the review in response to your request to obtain information on rent ceiling adjustments and rent charged on rent-controlled properties. Our report presents the results of data gathering and compilation efforts and contains no findings or recommendations that would require further comment. We also included comments on issues discussed with Dr. Patrick J. Canavan, Director, Department of Consumer and Regulatory Affairs during our exit conference in the final report, as appropriate.

We appreciate the cooperation and courtesies extended to our staff during the audit. If you have questions, please contact William J. DiVello, Assistant Inspector General for Audits, at 202-727-2540.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles J. Willoughby", is written over a white background.

Charles J. Willoughby
Inspector General

CJW/ws

Enclosure

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**REVIEW OF HOUSING PROVIDER FILINGS AT THE
RENTAL ACCOMMODATIONS AND CONVERSION DIVISION OF
THE DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS**

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EXECUTIVE DIGEST

OVERVIEW

At the request of Councilmember Jim Graham, the District of Columbia Office of the Inspector General (OIG) has completed a review related to housing provider filings at the Rental Accommodations and Conversion Division (RACD) of the Department of Consumer and Regulatory Affairs (DCRA).

Our original audit objectives were to determine: (1) the effectiveness of the District of Columbia's rent control law, specifically, whether rent ceiling adjustments control the cost of rental housing; and (2) whether the Department of Consumer and Regulatory Affairs receives, processes, and maintains documents required for adjustments in rent ceilings in compliance with applicable laws, regulations, policies, and procedures.

However, at the request of Councilmember Graham, we suspended the audit field work and performed a review that compiled and presented data on rent ceilings and rent charged, as submitted by housing providers. We did not verify, analyze, or evaluate the data; therefore, we express no opinions, conclusions, or recommendations related to the information gathered.

Exhibits A through G summarize the total increase in rent ceilings and rent charged per rental unit for seven apartment buildings covered by rent control provisions of The Rental Housing Act of 1985 (D.C. Law 6-10). Rent ceilings and rent charged for each apartment building generally cover the period of 1999¹ through 2005.

For each apartment building, the report contains tables showing:

- rent ceiling adjustments by affordability criteria (1999 versus 2005);
- rent charged by affordability criteria (1999 versus 2005);
- rent ceiling ranges for 2005;
- rent charged ranges for 2005;
- rent charged in excess of rent ceiling (1999-2005);
- frequency of rent increases (1999-2005);
- Consumer Price Index rent ceiling adjustments that exceed the published rates (1999-2005);
- vacancy high comparable rent ceiling adjustments (1999-2005);
- vacancy 12 percent rent ceiling adjustments (1999-2005);

¹ We compiled limited rent ceiling and rent charged data for 1998 for two buildings because the documents submitted by the housing providers were either dated by the housing providers or date stamped by DCRA in 1999.

EXECUTIVE DIGEST

- vacancy rent ceiling adjustments of less than 13 percent categorized as vacancy high comparable rent ceiling adjustments; and
- certificates of election filed with DCRA 30 days after effective date (1999-2005).

In addition, the report contains a table showing corrected filings for vacancy high comparable rent ceiling adjustments that were not filed within 30 days of the vacancy due to computer errors for one apartment building in 1999 and 2000.

Summary information on the rent ceilings and rent charged for each of the seven rent controlled buildings is shown in Exhibits A through G. More details, encompassing hundreds of pages of data that show the historical rent ceiling adjustments and rent charged were provided to the Director, DCRA and the office of Councilmember Jim Graham.

COMMENTS FROM AGENCY OFFICIALS

On December 12, 2005, we received comments to the report from the Director, DCRA. Although we did not identify findings, conclusions, or recommendations, we consider the comments to be responsive to the rent control trends identified in the report.

For example, DCRA plans to use the report as a foundation for conducting further analyses of housing provider filings throughout the District of Columbia. In addition, DCRA plans to use the information from the report and templates designed by OIG auditors to enhance RACD data collection and compilation efforts.

DCRA also plans to design and implement an electronic submission system for housing providers to use for rental housing filings, which will expand the capacity of DCRA staff to quickly and thoroughly review data in easily accessible formats. Finally, DCRA plans to review staffing and skill levels and anticipates hiring a new Rent Administrator and counsel by early 2006. The complete text of DCRA's comments is in Exhibit H.

INTRODUCTION

BACKGROUND

The District of Columbia Office of the Inspector General (OIG) has completed its compilation and presentation of data related to housing provider filings at the Rental Accommodations and Conversion Division (RACD) of the Department of Consumer and Regulatory Affairs (DCRA). This review was performed at the request of Councilmember Jim Graham.

The mission of the DCRA is to protect the health, safety, and welfare of District residents and those who work in and visit the District of Columbia. The DCRA Inspections and Compliance program provides inspections, enforcement, and abatement services for residential properties. The program also resolves housing provider and tenant disputes (e.g., rent increases) to ensure a stable market of affordable housing for District residents. The Inspections and Compliance program consists of, in part, the Housing Service Center and Rent Administration. These activities are conducted in the RACD, which is headed by the Rent Administrator pursuant to D.C. Code § 42-3502.03(a) (LEXIS through Sept. 2, 2005).

The Housing Service Center provides information on housing provider and tenant rights, resolves housing provider and tenant problems, and implements rent control laws for citizens, property owners, and tenants. Rent Administration enforces rent control laws, resolves disputes, and processes rental increases authorized by law through hearings, decisions, and other rental housing services provided to tenants and housing providers.

D.C. Code § 42-3502.04(d)(1) states that the “Rent Administrator may employ, with funds available to the Rent Administrator, personnel and consultants, including hearing examiners, accountants, and legal counsel, reasonably necessary to carry out” the rental housing program. The Rent Administrator manages approximately 17 employees: 11 in the Housing Service Center, 1 Rent Administration staff support, and 5 hearing examiners.

The Rent Administrator was preparing a plan at the time of our field work to transfer the adjudicatory function of her office to the Office of Administrative Hearings pursuant to D.C. Code § 2-1831.03 (b-1). The plan will describe the resources needed to maintain the Rent Administrator’s non-adjudicatory functions.

Decisions issued by the Rent Administrator can be appealed to the Rental Housing Commission.² The Rental Housing Commission consists of three commissioners with terms not to exceed 3 years, and one staff member. D.C. Code § 42-3502.02 requires DCRA to employ the staff necessary to assist the Rental Housing Commission, including three law

² Decisions issued by the Rental Housing Commission can be appealed to the District of Columbia Court of Appeals.

INTRODUCTION

clerks. However, DCRA's approved FY 2005 and proposed FY 2006 budgets only support four full-time positions for the Rental Housing Commission.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our original audit objectives were to determine: (1) the effectiveness of the District of Columbia's rent control law, specifically, whether rent ceiling adjustments control the cost of rental housing; and (2) whether DCRA receives, processes, and maintains documents required for adjustments in rent ceilings in compliance with applicable laws, regulations, policies, and procedures.

Based on a meeting with Councilmember Graham, we suspended audit field work under this project and redefined our audit as a non-audit service of compiling and presenting data. Although this change enabled us to present compiled data expeditiously, we did not verify, analyze, or evaluate the data presented. Further, because we conducted a non-audit service review, we were not required to comply with generally accepted government auditing standards.

We extracted certificates of elections and amended registration forms from Filenet, a document imaging and retrieval system maintained by DCRA. Housing providers use the forms to file rent ceiling adjustments and increases in rent charged. We excluded duplicate records from our compilation of the data. The reliability and completeness of the data are not known as we did not assess the reliability of computer-generated data and did not validate the accuracy of information recorded in the source documents.

To gain an understanding of the District's rent control laws, we conducted interviews and held discussions with DCRA senior officials, the Rent Administrator, the Rental Housing Commission, staff from Councilmember Graham's office, and a tenant advocate with the Tenant Action Network. We also attended a Rent Control Hearing held on October 26, 2005.

PRESENTATION OF DATA

INCREASES IN RENT CEILINGS AND RENT CHARGED
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Housing providers file documentation of rent ceiling adjustments and rent charged with the DCRA Rent Administrator. We compiled data on rent ceiling adjustments and rent charged for seven buildings located in six of the eight District wards. The data present various comparisons and histories of rent ceiling adjustments and rent charged for the seven buildings during different time periods from 1999 to 2005.

DISCUSSION

The Rental Housing Act of 1985³ (D.C. Law 6-10) was intended to resolve a severe shortage of rental housing in the District of Columbia. According to the Act, the shortage of affordable rental housing was caused, in part, by the withdrawal of rental units from the market, the deterioration of existing units, the lack of rehabilitation of existing housing, and the lack of construction of new housing.⁴

Rental Housing Market. According to a report issued by the Fannie Mae Foundation in 2002,⁵ the booming housing market in the 1990s intensified the challenges facing low-income households, especially renters. The report states that: “The District accounts for a disproportionate share of the region’s most affordable rental housing, but declining vacancy rates and rising rent make it harder for low-income households to find units they can afford in many District neighborhoods.”⁶

Based on data provided in “Washington, DC by the Numbers,” a research publication by the Washington, DC Marketing Center in collaboration with the D.C. Research and Information Group,⁷ 59 percent of District of Columbia households occupied rental property in 2003. A report issued by The Urban Institute in October 1988 states that two-thirds, or 101,100, of the

³ The Rental Housing Act of 1985 is hereafter referred to as the Rent Control Program.

⁴ D.C. Code § 42-3501.01(2) (LEXIS through Sept. 2, 2005).

⁵ FANNIE MAE FOUNDATION/URBAN INSTITUTE, HOUSING IN THE NATION’S CAPITAL 1 (2002).

⁶ *Id.* at 30.

⁷ The Research and Information Group is comprised of various researchers and data collectors who have a common goal of sharing information. Some participants include DCRA, the District of Columbia Office of Planning/State Data Center, Metropolitan Washington Council of Governments, Washington Convention and Tourism Corporation, the District of Columbia Office of Research and Analysis, and the National Capital Planning Commission.

PRESENTATION OF DATA

rental units in the District of Columbia were subject to rent control.⁸ Although we were unable to obtain current statistics regarding the number of rent controlled units in the District of Columbia, the DC Fiscal Policy Institute reported in September of this year that the District has lost thousands of units of affordable rental housing from 2000 - 2004.⁹

Councilmember Jim Graham expressed particular concern with buildings such as Park Plaza and Cleveland House (shown below), located in Northwest Washington, D.C. Park Plaza is located in Ward 1 and Cleveland House is located in Ward 3.



Park Plaza



Cleveland House

The DC Fiscal Policy Institute also reported that the District of Columbia “has seen increases in rent...that have outpaced the growth in income of many District residents,” which has resulted in “many more households paying [] too large a share of their income in housing costs.”¹⁰ For example, in 2003, 46 percent of renters paid 30 percent or more of their household income in housing costs, while 25 percent of renters paid 50 percent or more.¹¹

⁸ THE URBAN INSTITUTE, RENT CONTROL AND THE AVAILABILITY OF AFFORDABLE HOUSING IN THE DISTRICT OF COLUMBIA: A DELICATE BALANCE 1 (1988).

⁹ ANGIE RODGERS, DC FISCAL POLICY INSTITUTE, NEW CENSUS DATA SHOW DC’S AFFORDABLE HOUSING CRISIS IS WORSENING 1 (Sept. 13, 2005).

¹⁰ ANGIE RODGERS, DC FISCAL POLICY INSTITUTE, SQUEEZED OUT: THE WORSENING SHORTAGE OF AFFORDABLE HOUSING FOR LOW-INCOME DC HOUSEHOLDS 6 (Jan. 13, 2005).

¹¹ *Id.* at 6-8.

PRESENTATION OF DATA

“Washington, DC by the Numbers” indicates that the District of Columbia average and median household incomes for 2003 were \$74,221 and \$51,179, respectively.¹² When viewed by Ward, the average household income ranges from \$38,754 to \$134,506 and median household incomes range from \$26,145 to \$89,675.¹³

However, according to the DC Fiscal Policy Institute, there were 55,000 renter households with income below \$20,000 in the District of Columbia in 2003.¹⁴ Table 1 shows the average and median household incomes by Ward for 2003 as reported by “Washington, DC by the Numbers.”¹⁵

<i>Ward</i>	<i>Average Income</i>	<i>Median Income</i> ¹⁶
1	\$ 60,636	\$42,429
2	91,942	55,708
3	134,506	89,675
4	76,906	57,892
5	52,206	39,892
6	66,580	48,651
7	45,407	33,680
8	38,754	26,145

Rent Control Program. Rather than mandate fixed rent, the Rent Control Program regulates rent increases and places a cap (rent ceiling) on the amount a housing provider can charge a tenant for a rental unit.¹⁷ The rent charged by a housing provider may be less than the rent ceiling, but cannot be more than the rent ceiling. The two most common types of adjustments¹⁸ to rent ceilings under the Rent Control Program are annual adjustments based

¹² WASHINGTON, DC MARKETING CENTER AND D.C. RESEARCH & INFORMATION GROUP, WASHINGTON, DC BY THE NUMBERS 29 (2003 ed.).

¹³ *Id.* at 30.

¹⁴ IDARA NICKELSON AND ED LAZERE, DC FISCAL POLICY INSTITUTE, TRENDS IN FUNDING FOR AFFORDABLE HOUSING IN THE DISTRICT OF COLUMBIA 2 (Mar. 7, 2005).

¹⁵ WASHINGTON, DC MARKETING CENTER AND D.C. RESEARCH & INFORMATION GROUP, WASHINGTON DC BY THE NUMBERS 30 (2003 ed.).

¹⁶ The middle value in a distribution, above and below which lie an equal number of values.

¹⁷ Rental housing exempt from the Rent Control Program are listed in D.C. Code § 42-3502.05.

¹⁸ Housing providers may also petition to increase rent ceilings to reflect (1) the cost increases associated with capital improvements or substantial rehabilitation of the property, (2) for changes in services and facilities available at the property, and (3) for financial hardship, in which case rent ceiling increases can be approved to generate a 12 percent cash return on equity. In addition, housing providers may negotiate voluntary agreements with tenants to increase rent ceilings.

PRESENTATION OF DATA

on the Washington, D.C., Standard Metropolitan Statistical Area Consumer Price Index for Urban Wage Earners and Clerical Workers (Consumer Price Index or CPI) and vacancy adjustments.

Annual CPI Rent Ceiling Adjustments. Each year a housing provider may adjust the rent ceilings of all rental units in a housing accommodation by an amount based on the change in the CPI during the previous calendar year. This increase may not exceed 10 percent.¹⁹ D.C. Code §§ 42-3502.02(a)(3) and 42-3502.04(k) require the Rental Housing Commission to calculate the CPI percentage each year and the Rent Administrator to publish it in the District of Columbia Register prior to March 1 of each year. Housing providers are not eligible to take the annual CPI rent ceiling adjustment until May 1 of each year.²⁰

Housing providers may adjust the rent ceiling and rent charged simultaneously, adjust the rent ceiling with no change in the rent charged, or increase the rent charged after the automatic rent ceiling adjustment is taken. To take the CPI rent ceiling adjustment, the housing provider must file a “Certificate of Election of Adjustment of General Applicability” with DCRA and provide notice to tenants either by posting the certificate in a public place in the building or by mail.²¹ When housing providers increase the rent after the automatic rent ceiling adjustment is taken, they are required to submit to DCRA an affidavit of service showing when and how they provided notice of the adjustment to tenants.²²

Vacancy Adjustments. D.C. Code § 42-3502.05(g) requires housing providers to file, within 30 days of units becoming vacant, amended registration forms when increasing rent ceilings due to vacancies. When a rental unit is vacated on the tenant’s own initiative or as a result of a notice to vacate,²³ the housing provider may adjust the rent ceiling for that unit in one of two ways: the housing provider may increase the rent ceiling of the vacated unit by either 12 percent, once per 12-month period, or increase the rent ceiling up to the rent ceiling of a substantially identical unit in the same housing accommodation (commonly referred to as a “vacancy high comparable” rent ceiling adjustment).

¹⁹ RENTAL HOUSING COMMITTEE REAL ESTATE, HOUSING AND LAND USE SECTION THE DISTRICT OF COLUMBIA BAR, UNDERSTANDING RENT CONTROL 9 (Apr. 1989).

²⁰ RENTAL HOUSING COMMITTEE REAL ESTATE, HOUSING AND LAND USE SECTION THE DISTRICT OF COLUMBIA BAR, UNDERSTANDING RENT CONTROL 10 (Apr. 1989).

²¹ *Id.* at 15.

²² *Id.* at 16.

²³ Housing providers may provide notice to vacate for nonpayment of rent, violation of an obligation of the renter’s tenancy, or use of the unit for illegal purposes.

PRESENTATION OF DATA

As with CPI adjustments, housing providers may adjust the rent ceiling and rent charged for a vacancy simultaneously, adjust the rent ceiling with no change in the rent charged, or increase the rent charged after the vacancy rent ceiling adjustment is taken.

Buildings Reviewed. Based on discussions with Councilmember Graham, the DCRA Rent Administrator, and the Rental Housing Commission, we extracted and compiled rental data from Filenet for seven buildings located in the District of Columbia (see Table 2). We limited the data compilation to CPI and vacancy adjustments.

Building	Address	Quadrant	Ward	Units²⁴
Park Plaza	1629 Columbia Road	NW	1	280
Barclay Apartments	1616 16 th Street	NW	2	57
Columbia Plaza	2400 Virginia Avenue	NW	2	268
Cleveland House	2727 29 th Street	NW	3	216
The Rittenhouse	6101 16 th Street	NW	4	204
Parkview Apartments	5120 Sargent Road	NE	5	51
Marbury Plaza	2300 Good Hope Road	SE	7	316

Rent Ceilings in Excess of \$1,000. The DC Fiscal Policy Institute defines affordable rental units for low income families as gross rent²⁵ under \$500; affordable rental units for low- and moderate-income households as gross rent of \$500 to \$1,000; and high-cost rental units as gross rent over \$1,000.²⁶ Table 3 lists the housing providers who reported 1999 rent ceilings in excess of \$1,000 per rental unit, ranging from a low of 20 percent of rental units exceeding \$1,000 to a high of 90 percent of rental units exceeding \$1,000. Comparatively, in 2005, housing providers reported rent ceilings in excess of \$1,000 per rental unit ranging from a low of 65 percent of rental units exceeding \$1,000 to a high of 96 percent of rental units exceeding \$1,000.

²⁴ The number of units listed per the buildings' business license or certificate of occupancy certificates. Some of the certificates of election and amended registration forms submitted by housing providers contained data for a different number of units.

²⁵ Gross rent includes rent and utility costs.

²⁶ ANGIE RODGERS, DC FISCAL POLICY INSTITUTE, NEW CENSUS DATA SHOW DC'S AFFORDABLE HOUSING CRISIS IS WORSENING 1-2 (Sept. 13, 2005).

PRESENTATION OF DATA

	Affordable		Moderate		Unaffordable		Total Units Per Building	Percent Unaffordable	
	<i>Under \$500²⁷</i>		<i>\$500 - \$1,000</i>		<i>Over \$1,000</i>			1999	2005
Building	1999²⁸	2005²⁹	1999	2005	1999	2005		1999	2005
Park Plaza	5	2	133	40	141	237	280	50%	85%
Barclay Apartments	3	2	15	6	39	49	57	68%	86%
Columbia Plaza	1	0	65	41	200	225	268	75%	84%
Cleveland House	0	0	19	6	195	208	216	90%	96%
The Rittenhouse	4	0	131	34	71	172	204	35%	84%
Parkview Apartments	0	0	41	18	10	33	51	20%	65%
Marbury Plaza	1	0	65	34	250	282	316	79%	89%

Rent Charged in Excess of \$1,000. Table 4 lists those housing providers who reported actual rent charged in excess of \$1,000. Rent charged in excess of \$1,000 (as a percent of the total units in the building) in 1999 ranged from a low of 0 percent of rental units exceeding \$1,000 to a high of 68 percent of rental units in excess of \$1,000. Comparatively, in 2005, housing providers reported rent charged in excess of \$1,000 per rental unit ranging from a low of 12 percent of rental units exceeding \$1,000 to a high of 95 percent of rental units in excess of \$1,000. Table 4 also summarizes rent charged for all rental units in the seven buildings.

	Affordable		Moderate		Unaffordable		Total Units Per Building	Percent Unaffordable	
	<i>Under \$500</i>		<i>\$500 - \$1,000</i>		<i>Over \$1,000</i>			1999	2005
Building	1999	2005	1999	2005	1999	2005		1999	2005
Park Plaza	7	4	227	166	45	109	280	16%	39%
Barclay Apartments	4	3	40	23	13	31	57	23%	54%
Columbia Plaza	1	0	163	81	102	185	268	38%	69%
Cleveland House	0	0	67	8	147	206	216	68%	95%
The Rittenhouse	4	0	193	54	9	152	204	4%	75%
Parkview Apartments	0	0	51	39	0	12	51	0%	24%
Marbury Plaza	35	7	280	272	1	37	316	0%	12%

²⁷ We could not determine from the certificates of election and amended registration forms if the rent ceilings and rent charged included utilities. If the amounts do not include utilities, the number of rental units categorized as moderate and unaffordable would most likely increase.

²⁸ We use 1999 as our reference point even though two housing providers reported a few adjustments effective in 1998 but did not sign or file the documentation until 1999.

²⁹ We use 2005 as our reference point because that is the most recent year for which rent ceiling adjustments and rent increases occurred for many rental units. However, the documentation did not always include adjustments for all units in a building. Consequently, for a few units, the last adjustment may have occurred in an earlier year.

PRESENTATION OF DATA

Rent Ceiling Range. Housing providers reported 2005 rent ceilings ranging from a low of \$314 to a high of \$8,300 per rental unit. Table 5 shows the number of rent ceilings per rent ceiling range for each of the seven buildings.

<i>Rent Ceiling Range</i>	<i>Park Plaza</i>	<i>Barclay Apartments</i>	<i>Columbia Plaza</i>	<i>Cleveland House</i>	<i>The Rittenhouse</i>	<i>Parkview Apartments</i>	<i>Marbury Plaza</i>
\$300-\$399	0	2	0	0	0	0	0
\$400-\$499	2	0	0	0	0	0	0
\$500-\$599	2	0	1	0	1	0	1
\$600-\$699	9	1	16	0	7	2	10
\$700-\$799	5	1	5	1	3	2	5
\$800-\$899	11	2	11	3	12	9	10
\$900-\$999	13	2	8	2	11	5	8
\$1,000-\$1,999	57	26	17	8	82	33	9
\$2,000-\$2,999	161	23	13	3	72	0	44
\$3,000-\$3,999	19	0	53	5	18	0	61
\$4,000-\$4,999	0	0	112	13	0	0	101
\$5,000-\$5,999	0	0	29	53	0	0	58
\$6,000-\$6,999	0	0	1	62	0	0	8
\$7,000-\$7,999	0	0	0	38	0	0	0
\$8,000-\$8,999	0	0	0	26	0	0	1

Rent Charged Range. Housing providers reported 2005 rent charged ranging from a low of \$207 to a high of \$3,585 per rental unit. Table 6 shows the number of rent charged per rent charged range for the seven buildings.

<i>Rent Charged Range</i>	<i>Park Plaza</i>	<i>Barclay Apartments</i>	<i>Columbia Plaza</i>	<i>Cleveland House</i>	<i>The Rittenhouse</i>	<i>Parkview Apartments</i>	<i>Marbury Plaza</i>
\$200-\$299	1	0	0	0	0	0	0
\$300-\$399	0	3	0	0	0	0	0
\$400-\$499	3	0	0	0	0	0	7
\$500-\$599	3	2	2	0	5	0	12
\$600-\$699	24	2	16	0	9	2	47
\$700-\$799	33	7	5	1	11	5	80
\$800-\$899	34	4	17	4	14	16	87
\$900-\$999	72	8	33	3	13	16	46
\$1,000-\$1,999	97	30	191	146	154	12	37
\$2,000-\$2,999	12	1	2	57	72	0	0
\$3,000-\$3,999	0	0	0	3	18	0	0

Rent Charged in Excess of Rent Ceiling. D.C. Code § 42-3502.06(a) prohibits housing providers from charging rent in excess of the rent ceiling. Housing providers reported rent charged in excess of the applicable rent ceiling 70 times from 1999 to 2005. Table 7 shows,

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by building, the number of times housing providers reported rent charged in excess of the applicable rent ceiling.

Table 7. Rent Charged in Excess of Rent Ceiling	
<i>Building</i>	<i>Number of Times</i>
Park Plaza	30
Barclay Apartments	15
Columbia Plaza	0
Cleveland House	6
The Rittenhouse	11
Parkview Apartments	0
Marbury Plaza	8
Total	70

Frequency of Rent Increases. We identified 27 occasions during 1999-2005 where housing providers submitted certificates of election documenting rent increases for rental units more often than every 180 days. Table 8 shows the number of times the reported rent charged increased more often than every 180 days.

Table 8. Frequency of Rent Increases³⁰	
<i>Building</i>	<i>Number of Times</i>
Park Plaza	0
Barclay Apartments	0
Columbia Plaza	17
Cleveland House	1
The Rittenhouse	0
Parkview Apartments	1
Marbury Plaza	8
Total	27

CPI Rent Ceiling Adjustments Exceed the Published Rates. Housing providers submitted certificates of election containing CPI rent ceiling adjustments that exceeded the allowable rate published by the Rental Housing Commission 223 times from 1998³¹ to 2005. Table 9 shows, by building, the number of times the CPI rent ceiling adjustments exceeded the published rates.

³⁰ Rent increases were the result of CPI and vacancy adjustments.

³¹ We included CPI 1998 rent ceiling adjustments in our data compilation for two buildings because the certificates of elections either contained a 1999 effective date or were dated by the housing providers or date stamped by DCRA in 1999.

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<i>Building</i>	<i>1998</i>	<i>1999</i>	<i>2000</i>	<i>2001</i>	<i>2002</i>	<i>2003</i>	<i>2004</i>	<i>2005</i>	<i>Total</i>
Park Plaza	4	4	9	7	0	0	3	0	27
Barclay Apartments	0	0	1	2	0	1	3	0	7
Columbia Plaza	0	17	9	14	7	3	8	0	58
Cleveland House	0	0	0	0	0	0	0	0	0
The Rittenhouse	4	13	18	9	1	1	0	2	48
Parkview Apartments	0	2	12	3	5	7	3	1	33
Marbury Plaza	0	11	7	9	4	10	9	0	50
Total	8	47	56	44	17	22	26	3	223

Vacancy High Comparable Rent Ceiling Adjustments. Housing providers filed 1,085 vacancy high comparable rent ceiling adjustments from 1999 to 2005. The percent change in rent ceilings ranged from a negative percentage³² to 862 percent. See Table 10 for the percentage breakdown.

<i>Building</i>	<i>Percent Change in Rent Ceiling</i>						<i>Total</i>
	<i>Under 13%</i>	<i>13-49%</i>	<i>50-99%</i>	<i>100-199%</i>	<i>200-299%</i>	<i>300+%</i>	
Park Plaza	64	163	104	70	11	1	413
Barclay Apartments	19	51	11	1	1	1	84
Columbia Plaza	10	60	22	8	7	11	118
Cleveland House	5	17	22	11	0	13	68
The Rittenhouse	11	90	42	27	3	0	173
Parkview Apartments	0	5	8	1	0	0	14
Marbury Plaza	44	73	47	20	2	29	215
Total	153	459	256	138	24	55	1,085

Discussion. High comparable vacancy rent ceiling adjustments may be taken any time a unit becomes vacant provided that there is a substantially identical unit in the housing accommodation with a rent ceiling higher than the vacated unit's rent ceiling.

Vacancy 12 Percent Rent Ceiling Adjustments. Housing providers filed 661 vacancy 12 percent rent ceiling adjustments from 1999 to 2005. Of the 661 adjustments, 32 were documented as occurring more often than every 12 months. See Table 11 for the number of vacancy 12 percent rent ceiling adjustments taken per building.

³² We did not determine the cause of negative percentages because we did not verify the data reported by housing providers. However, possible causes include housing providers entering the *new* rent ceiling amount in the column for the *old* rent ceiling amount and vice versa or typing the wrong rent ceiling amount on the certificate of election.

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<i>Building</i>	<i>Number of Times Taken</i>	<i>Less Than 12 Months Between Increases</i>
Park Plaza	33	0
Barclay Apartments	19	2
Columbia Plaza	398	28
Cleveland House	105	0
The Rittenhouse	78	1
Parkview Apartments	21	1
Marbury Plaza	7	0
Total	661	32³³

Discussion. D.C. Code § 42-3502.13(a)(1) allows housing providers to file for the vacancy 12 percent rent ceiling adjustment once per 12-month period for any unit, no matter how many times the unit is vacated and re-rented. However, if fewer than 12 months have passed since the unit received a vacancy 12 percent rent ceiling adjustment, the housing provider may take a vacancy high comparable rent ceiling adjustment.³⁴ Within a 12-month period, housing providers for 5 of the 7 apartment buildings took 13 high comparable and 12 percent rent ceiling adjustments. However, in every case of the vacancy high comparable rent ceiling adjustment, the percentage increase was less than 13 percent.

Vacancy Rent Ceiling Adjustments of Less Than 13 Percent Categorized as Vacancy High Comparable Rent Ceiling Adjustments. Housing providers filed 153 vacancy high comparable rent ceiling adjustments of less than 13 percent from 1999 to 2005. D.C. Code §§ 42-3502.13(1) and (2) defines the two types of vacancy adjustments as either a 12 percent adjustment or an adjustment equal to the rent ceiling of a substantially identical rental unit in the same building. The 1-year waiting period for the vacancy 12% rent ceiling adjustment may be avoided by using the vacancy high comparable provision. Table 12 shows the number of vacancy high comparable rent ceiling adjustments of less than 13 percent.

<i>Building</i>	<i>Number of Times</i>
Park Plaza	64
Barclay Apartments	19
Columbia Plaza	10
Cleveland House	5

³³ This number could increase to 185 if housing providers improperly categorized 153 vacancy 12 percent rent ceiling adjustments as vacancy high comparable rent ceiling adjustments (see Table 12).

³⁴ Provided there is a substantially identical unit in the housing accommodation that has a higher rent ceiling.

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<i>Building</i>	<i>Number of Times</i>
The Rittenhouse	11
Parkview Apartments	0
Marbury Plaza	44
Total	153

Corrected Filings. One housing provider filed corrected vacancy high comparable rent ceiling adjustments on 23 units for previous years because of “missed filings due to computer errors.” On the same day as filing the corrections, the housing provider filed for the annual CPI rent ceiling adjustment for 20 of the units based on the higher rent ceiling. We found no record of the housing provider filing corrections after February 29, 2000.

However, the Rent Control Program does not provide relief for missed filings. Housing providers must file for, and serve notice of, vacancy and CPI rent ceiling adjustments within 30 days of becoming eligible for each per 42 DCMR §§ 4204.10(c) and 4207.5 (LEXIS through Oct. 2005 revisions). Because the corrected filings may be improper, all future rent ceiling adjustments and rent increases would have been calculated on the wrong rent ceiling amount. Table 13 shows the missed filings due to computer error.

Unit Number	Current Rent Ceiling	Previous Rent Ceiling	Percentage of Increase	Effective Date	Signature Date
108	\$1,526.00	\$833.00	83.20%	10/1/1998	4/1/1999
109	\$1,526.00	\$677.00	125.40%	8/1/1998	4/1/1999
208	\$1,197.00	\$697.00	71.70%	2/13/1998	4/1/1999
312	\$1,256.00	\$800.00	57.00%	4/1/1998	4/1/1999
501	\$1,256.00	\$576.00	118.10%	1/1/1998	4/1/1999
504	\$1,144.00	\$702.00	62.96%	7/1/1997	4/1/1999
524	\$1,499.00	\$835.00	79.50%	7/1/1998	4/1/1999
609	\$1,499.00	\$833.00	80.00%	6/1/1998	4/1/1999
610	\$1,086.00	\$708.00	53.40%	8/19/1998	4/1/1999
617	\$1,106.00	\$528.00	109.50%	5/11/1999	2/29/2000
618	\$1,499.00	\$1,526.00	48.00%	1/19/1999	4/1/1999
619	\$872.00	\$550.00	58.50%	3/1/1998	4/1/1999
626	\$1,086.00	\$528.00	109.20%	10/15/1998	4/1/1999
707	\$1,086.00	\$528.00	109.52%	1/31/1999	4/1/1999
709	\$1,499.00	\$849.00	79.70%	1/31/1999	4/1/1999
724	\$1,499.00	\$677.00	121.40%	8/31/1998	4/1/1999
725	\$1,526.00	\$687.00	122.10%	8/1/1998	4/1/1999
804	\$1,197.00	\$735.00	65.80%	2/1/1999	4/1/1999
806	\$977.00	\$553.00	76.70%	7/1/1998	4/1/1999

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| Unit Number |
|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| 810 | \$1,086.00 | \$797.00 | 36.30% | 1/16/1998 | 4/1/1999 |
| 817 | \$1,251.00 | \$1,117.00 | 12.00% | 1/14/2000 | 2/29/2000 |
| 820 | \$1,251 | \$816.00 | 53.31% | 12/4/1999 | 2/29/2000 |
| 901 | \$1,256.00 | \$637.00 | 97.20% | 7/1/1998 | 4/1/1999 |

Certificates of Election Filed With DCRA 30 Days After the Effective Date. DCRA date stamps (which serve as the date a Certificate of Election was filed with DCRA) indicate that 356 certificates of election for CPI adjustments and rent increases were dated more than 30 days after the effective date of the adjustment. Title 14 DCMR § 4204.10 requires certificates of election to be filed within 30 days following the date housing providers are first eligible to take the adjustment (often called the effective or anniversary date). Table 14 shows, by building, the number of times the date stamp on the certificates of election was more than 30 days after the effective date.

<i>Building</i>	<i>Number of Times</i>
Park Plaza	395
Barclay Apartments	64
Columbia Plaza	0
Cleveland House	0
The Rittenhouse	889
Parkview Apartments	0
Marbury Plaza	8
Total	1,356

SUMMARY OF EXHIBITS

Exhibits A through G summarize the total increase in rent ceilings and rent charged per rental unit for seven apartment buildings covered by rent control provisions of The Rental Housing Act of 1985 (D.C. Law 6-10). Rent ceilings and rent charged for each apartment building generally cover the period of 1999³⁵ through 2005. More than 700 pages of data, summarized in Exhibits A through G, were provided to the Director, DCRA and the office of Councilmember Jim Graham.

³⁵ We compiled limited rent ceiling and rent charged data for 1998 for two buildings because the documents submitted were either dated by the housing providers or date stamped by DCRA in 1999.

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COMMENTS FROM AGENCY OFFICIALS

On December 12, 2005, we received comments to the report from the Director, DCRA. Although we did not identify findings, conclusions, or recommendations, we consider the comments to be responsive to the rent control trends identified in the report.

For example, DCRA plans to use the report as a foundation for conducting further analyses of housing provider filings throughout the District of Columbia. In addition, DCRA plans to use the information from the report and templates designed by OIG auditors to enhance RACD data collection and compilation efforts.

DCRA also plans to design and implement an electronic submission system for housing providers to use for rental housing filings, which will expand the capacity of DCRA staff to quickly and thoroughly review data in easily accessible formats. Finally, DCRA plans to review staffing and skill levels and anticipates hiring a new Rent Administrator and counsel by early 2006. The complete text of DCRA's comments is in Exhibit H.

EXHIBIT A – PARK PLAZA RENT CEILINGS AND RENT CHARGED

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
1	835.00	919.00	10%	262.50	431.00	64%
2	456.00	504.37	11%	456.00	518.00	14%
3	777.00	2,174.00	180%	675.00	969.00	44%
4	833.00	1,978.00	137%	810.00	960.00	19%
5	717.00	2,318.00	223%	680.00	980.00	44%
6	906.00	2,969.00	228%	690.00	762.00	10%
7	591.00	861.00	46%	597.00	736.00	23%
8	1,070.00	1,799.00	68%	900.00	1,002.00	11%
9	573.00	633.02	10%	573.00	633.00	10%
10	1,041.00	2,993.00	188%	814.00	1,136.00	40%
11	1,071.00	2,672.00	149%	810.00	920.00	14%
12	1,593.00	2,503.00	57%	1,250.00	1,976.00	58%
13	1,547.00	1,757.00	14%	1,100.00	1,249.00	14%
14	1,020.00	2,993.00	193%	1,020.00	1,086.00	6%
15	1,069.00	1,191.00	11%	802.00	893.00	11%
16	672.00	762.00	13%	672.00	762.00	13%
17	1,042.00	2,993.00	187%	810.00	1,021.00	26%
18	852.00	2,282.00	168%	775.00	1,144.00	48%
19	1,030.00	2,969.00	188%	650.00	713.00	10%
20	757.00	843.00	11%	646.00	718.00	11%
21	673.00	2,651.00	294%	660.00	925.00	40%
22	816.00	2,651.00	225%	670.00	706.00	5%
23	1,059.00	1,126.00	6%	814.00	897.00	10%
24	1,572.00	2,686.00	71%	1,200.00	1,304.00	9%
25	1,090.00	1,160.00	6%	810.00	1,284.00	59%
26	838.00	3,325.00	297%	795.00	1,313.00	65%
27	738.00	2,651.00	259%	650.00	664.00	2%
28	417.00	478.00	15%	417.00	478.00	15%
29	757.00	837.22	11%	646.00	715.00	11%
30	1,030.00	2,671.00	159%	765.00	806.00	5%
31	1,540.00	2,456.00	59%	1,275.00	1,929.00	51%
32	1,274.00	1,491.00	17%	1,274.00	1,461.00	15%
33	1,537.00	2,686.00	75%	1,150.00	1,429.00	24%
34	1,030.00	2,671.00	159%	766.00	869.00	13%
35	1,030.00	2,992.00	190%	771.00	853.00	11%
36	1,040.00	2,385.00	129%	696.00	886.00	27%
37	1,039.00	2,993.00	188%	795.00	875.00	10%
38	1,034.00	1,142.50	10%	800.00	884.00	11%
39	605.00	1,181.30	95%	605.00	669.00	11%
40	720.00	2,671.00	271%	650.00	1,003.00	54%

**EXHIBIT A – PARK PLAZA RENT CEILINGS AND RENT CHARGED
(cont'd.)**

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
41	1,021.00	2,969.00	191%	650.00	957.00	47%
42	757.00	2,672.00	253%	810.00	840.00	4%
43	1,040.00	2,993.00	188%	810.00	1,415.00	75%
44	1,039.00	1,180.00	14%	822.00	935.00	14%
45	1,063.00	1,150.00	8%	800.00	983.00	23%
46	1,549.00	2,607.00	68%	1,300.00	1,377.00	6%
47	1,251.00	2,662.00	113%	1,300.00	1,885.00	45%
48	1,092.00	2,359.00	116%	775.00	1,415.00	83%
49	1,045.00	2,282.00	118%	820.00	1,340.00	63%
50	1,013.00	1,161.00	15%	809.00	930.00	15%
51	771.00	1,341.00	74%	848.00	937.00	10%
52	1,081.00	1,194.57	11%	783.00	864.00	10%
53	1,030.00	2,671.00	159%	650.00	1,003.00	54%
54	485.00	540.00	11%	485.00	540.00	11%
55	822.00	2,367.00	188%	670.00	1,006.00	50%
56	787.00	903.00	15%	650.00	784.00	21%
57	802.00	919.00	15%	788.00	919.00	17%
58	1,609.00	2,686.00	67%	1,350.00	1,377.00	2%
59	1,021.00	2,993.00	193%	817.00	928.00	14%
60	742.00	2,671.00	260%	600.00	930.00	55%
61	1,030.00	2,992.00	190%	772.00	909.00	18%
62	1,030.00	2,671.00	159%	772.00	909.00	18%
63	1,039.00	1,157.00	11%	783.00	872.00	11%
64	1,030.00	2,992.00	190%	772.00	909.00	18%
65	724.00	3,351.00	363%	690.00	978.00	42%
66	1,536.00	3,366.00	119%	1,250.00	2,043.00	63%
67	1,565.00	2,138.00	37%	1,250.00	1,865.00	49%
68	1,572.00	1,730.00	10%	1,205.00	1,397.00	16%
69	1,030.00	3,351.00	225%	640.00	978.00	53%
70	685.00	2,992.00	337%	640.00	952.00	49%
71	968.00	1,112.00	15%	670.00	795.00	19%
72	1,073.00	1,142.00	6%	800.00	858.00	7%
73	1,079.00	2,672.00	148%	880.00	928.00	5%
74	839.00	2,510.00	199%	839.00	1,286.00	53%
75	484.00	2,969.00	513%	484.00	515.00	6%
76	1,609.00	1,828.00	14%	660.00	749.00	13%
77	1,015.00	1,782.00	76%	860.00	1,136.00	32%
78	1,019.00	1,093.00	7%	765.00	842.00	10%
79	1,004.00	2,993.00	198%	887.00	988.00	11%

**EXHIBIT A – PARK PLAZA RENT CEILINGS AND RENT CHARGED
(cont'd.)**

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
80	620.00	685.09	10%	620.00	685.00	10%
81	1,415.00	3,008.00	113%	1,150.00	1,925.00	67%
82	833.00	947.00	14%	833.00	947.00	14%
83	976.00	2,672.00	174%	810.00	1,023.00	26%
84	1,035.00	1,143.52	10%	788.00	871.00	11%
85	1,073.00	2,672.00	149%	820.00	1,033.00	26%
86	980.00	2,672.00	173%	810.00	1,350.00	67%
87	1,021.00	2,993.00	193%	787.00	1,153.00	47%
88	785.00	2,018.00	157%	662.00	866.00	31%
89	704.00	749.00	6%	662.00	706.00	7%
90	822.00	919.00	12%	667.00	767.00	15%
91	686.00	765.00	12%	680.00	759.00	12%
92	568.00	664.00	17%	568.00	664.00	17%
93	1,565.00	2,764.00	77%	1,250.00	2,053.00	64%
94	1,094.00	1,782.00	63%	1,000.00	1,033.00	3%
95	640.00	2,018.00	215%	640.00	919.00	44%
96	655.00	2,671.00	308%	606.00	674.00	11%
97	740.00	2,651.00	258%	660.00	695.00	5%
98	1,006.00	2,642.00	163%	830.00	1,389.00	67%
99	984.00	2,367.00	141%	640.00	960.00	50%
100	734.00	2,969.00	304%	650.00	685.00	5%
101	1,557.00	2,764.00	78%	1,575.00	2,043.00	30%
102	850.00	974.00	15%	850.00	974.00	15%
103	1,510.00	2,269.00	50%	1,275.00	1,756.00	38%
104	774.00	2,168.60	180%	647.00	890.00	38%
105	786.00	2,318.00	195%	630.00	690.00	10%
106	1,165.00	1,246.00	7%	700.00	774.00	11%
107	910.00	1,043.00	15%	825.00	965.00	17%
108	1,053.00	1,120.00	6%	779.00	825.00	6%
109	1,050.00	2,672.00	154%	775.00	1,050.00	35%
110	810.00	894.40	10%	672.00	742.00	10%
111	774.00	2,969.00	284%	662.00	706.00	7%
112	815.00	867.00	6%	780.00	867.00	11%
113	877.00	2,993.00	241%	825.00	944.00	14%
114	1,101.00	2,993.00	172%	850.00	965.00	14%
115	1,090.00	2,576.00	136%	890.00	1,389.00	56%
116	1,300.00	1,437.00	11%	1,262.00	1,395.00	11%
117	1,583.00	2,686.00	70%	1,262.00	2,043.00	62%
118	972.00	1,136.00	17%	775.00	955.00	23%

EXHIBIT A – PARK PLAZA RENT CEILINGS AND RENT CHARGED
(cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
119	915.00	1,022.00	12%	810.00	954.00	18%
120	1,233.00	1,361.00	10%	880.00	971.00	10%
121	1,079.00	1,616.00	50%	915.00	945.00	3%
122	1,012.00	1,085.00	7%	820.00	938.00	14%
123	1,012.00	2,671.00	164%	693.00	1,003.00	45%
124	1,030.00	2,992.00	190%	650.00	995.00	53%
125	680.00	2,651.00	290%	680.00	694.00	2%
126	825.00	2,969.00	260%	664.00	833.00	25%
127	1,057.00	1,212.00	15%	835.00	970.00	16%
128	1,263.00	2,920.00	131%	1,263.00	1,450.00	15%
129	1,037.00	2,993.00	189%	840.00	1,136.00	35%
130	752.00	3,325.00	342%	660.00	988.00	50%
131	799.00	2,969.00	272%	799.00	850.00	6%
132	536.00	2,385.00	345%	536.00	978.00	82%
133	993.00	2,672.00	169%	800.00	1,136.00	42%
134	717.00	821.00	15%	638.00	733.00	15%
135	710.00	814.00	15%	645.00	765.00	19%
136	1,498.00	2,686.00	79%	1,150.00	1,351.00	17%
137	1,424.00	3,008.00	111%	1,250.00	1,370.00	10%
138	1,519.00	1,725.00	14%	1,150.00	1,339.00	16%
139	1,165.00	3,325.00	185%	650.00	930.00	43%
140	1,040.00	2,385.00	129%	655.00	978.00	49%
141	757.00	2,385.00	215%	655.00	1,014.00	55%
142	1,052.00	2,993.00	185%	850.00	1,225.00	44%
143	810.00	2,811.00	247%	810.00	1,363.00	68%
144	1,012.00	2,811.00	178%	810.00	1,425.00	76%
145	786.00	2,367.00	201%	640.00	995.00	55%
146	806.00	2,969.00	268%	660.00	715.00	8%
147	987.00	2,672.00	171%	870.00	1,033.00	19%
148	1,067.00	2,672.00	150%	870.00	1,240.00	43%
149	1,021.00	1,277.00	25%	810.00	967.00	19%
150	945.00	2,672.00	183%	820.00	1,240.00	51%
151	1,565.00	2,377.00	52%	1,250.00	1,930.00	54%
152	1,529.00	2,630.00	72%	1,250.00	1,996.00	60%
153	1,090.00	2,672.00	145%	820.00	1,365.00	66%
154	1,021.00	2,672.00	162%	850.00	965.00	14%
155	619.00	686.00	11%	619.00	686.00	11%
156	1,090.00	1,159.00	6%	850.00	916.00	8%
157	600.00	688.00	15%	600.00	688.00	15%

**EXHIBIT A – PARK PLAZA RENT CEILINGS AND RENT CHARGED
(cont'd.)**

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
158	810.00	919.00	13%	650.00	823.00	27%
159	771.00	877.00	14%	650.00	763.00	17%
160	933.00	1,031.00	11%	690.00	762.00	10%
161	825.00	2,367.00	187%	680.00	985.00	45%
162	1,059.00	1,872.00	77%	785.00	1,058.00	35%
163	1,522.00	2,920.00	92%	1,250.00	1,808.00	45%
164	971.00	2,993.00	208%	820.00	873.00	6%
165	670.00	746.00	11%	631.00	703.00	11%
166	1,030.00	2,992.00	190%	640.00	900.00	41%
167	751.00	2,169.00	189%	630.00	890.00	41%
168	1,600.00	2,672.00	67%	850.00	949.00	12%
169	712.00	2,120.00	198%	636.00	893.00	40%
170	774.00	2,969.00	284%	640.00	978.00	53%
171	1,131.00	3,205.00	183%	1,131.00	1,899.00	68%
172	1,286.00	2,154.00	67%	1,950.00	2,000.00	3%
173	1,554.00	3,008.00	94%	1,335.00	2,053.00	54%
174	727.00	3,351.00	361%	640.00	681.00	6%
175	725.00	3,325.00	359%	690.00	911.00	32%
176	655.00	1,246.00	90%	655.00	774.00	18%
177	580.00	665.00	15%	580.00	665.00	15%
178	1,039.00	1,192.00	15%	809.00	937.00	16%
179	570.00	2,811.00	393%	570.00	666.00	17%
180	776.00	2,671.00	244%	680.00	890.00	31%
181	756.00	2,671.00	253%	660.00	706.00	7%
182	1,089.00	2,993.00	175%	808.00	892.00	10%
183	911.00	2,993.00	229%	911.00	1,044.00	15%
184	1,035.00	1,782.00	72%	825.00	1,215.00	47%
185	1,015.00	1,079.00	6%	832.00	1,025.00	23%
186	1,599.00	2,862.00	79%	1,300.00	1,963.00	51%
187	1,557.00	3,008.00	93%	1,150.00	1,985.00	73%
188	1,040.00	2,993.00	188%	860.00	906.00	5%
189	1,059.00	2,672.00	152%	800.00	1,360.00	70%
190	988.00	2,282.00	131%	815.00	1,375.00	69%
191	1,054.00	2,672.00	154%	860.00	949.00	10%
192	810.00	1,175.00	45%	810.00	978.00	21%
193	745.00	2,436.00	227%	680.00	971.00	43%
194	1,040.00	2,651.00	155%	690.00	1,024.00	48%
195	823.00	2,969.00	261%	680.00	717.00	5%
196	1,030.00	2,366.68	130%	694.00	1,016.00	46%

EXHIBIT A – PARK PLAZA RENT CEILINGS AND RENT CHARGED
(cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
197	564.00	640.00	13%	564.00	640.00	13%
198	1,529.00	3,096.00	102%	1,350.00	1,713.00	27%
199	1,090.00	2,672.00	145%	830.00	867.00	4%
200	1,030.00	1,609.00	56%	640.00	769.00	20%
201	745.00	2,651.00	256%	630.00	664.00	5%
202	1,030.00	3,325.00	223%	645.00	690.00	7%
203	904.00	2,576.00	185%	775.00	1,415.00	83%
204	1,030.00	2,651.00	157%	650.00	663.00	2%
205	1,165.00	2,174.00	87%	670.00	889.00	33%
206	953.00	1,052.65	10%	953.00	1,053.00	10%
207	1,500.00	2,630.00	75%	1,250.00	2,048.00	64%
208	1,585.00	3,005.00	90%	1,250.00	2,058.00	65%
209	745.00	3,351.00	350%	635.00	978.00	54%
210	765.00	814.00	6%	641.00	685.00	7%
211	795.00	2,174.00	173%	680.00	1,024.00	51%
212	1,080.00	2,672.00	147%	825.00	1,033.00	25%
213	1,025.00	2,169.00	112%	835.00	1,399.00	68%
214	580.00	2,672.00	361%	875.00	1,350.00	54%
215	833.00	2,651.00	218%	668.00	682.00	2%
216	888.00	1,778.00	100%	690.00	762.00	10%
217	1,070.00	1,181.00	10%	808.00	892.00	10%
218	1,073.00	2,993.00	179%	850.00	941.00	11%
219	856.00	2,993.00	250%	900.00	1,380.00	53%
220	1,012.00	2,672.00	164%	850.00	1,350.00	59%
221	1,529.00	3,005.00	97%	1,250.00	2,058.00	65%
222	1,322.00	3,369.00	155%	1,200.00	1,756.00	46%
223	1,062.00	2,576.00	143%	825.00	1,415.00	72%
224	1,027.00	1,144.00	11%	843.00	939.00	11%
225	1,024.00	2,282.00	123%	860.00	1,385.00	61%
226	976.00	1,039.00	6%	850.00	928.00	9%
227	1,035.00	2,993.00	189%	950.00	1,385.00	46%
228	785.00	2,671.00	240%	650.00	784.00	21%
229	757.00	2,436.00	222%	662.00	998.00	51%
230	807.00	2,969.00	268%	680.00	800.00	18%
231	825.00	947.00	15%	680.00	784.00	15%
232	902.00	960.00	6%	825.00	901.00	9%
233	1,565.00	2,686.00	72%	1,300.00	1,422.00	9%
234	995.00	1,099.62	11%	858.00	949.00	11%
235	794.00	878.06	11%	631.00	696.00	10%

**EXHIBIT A – PARK PLAZA RENT CEILINGS AND RENT CHARGED
(cont'd.)**

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
236	772.00	2,969.00	285%	610.00	691.00	13%
237	717.00	801.00	12%	652.00	795.00	22%
238	979.00	1,977.68	102%	830.00	1,353.00	63%
239	693.00	2,651.00	283%	636.00	955.00	50%
240	685.00	766.00	12%	635.00	749.00	18%
241	897.00	991.39	11%	897.00	991.00	10%
242	854.00	980.00	15%	854.00	980.00	15%
243	866.00	956.68	10%	866.00	957.00	11%
244	713.00	2,367.00	232%	640.00	934.00	46%
245	674.00	1,955.00	190%	650.00	919.00	41%
246	770.00	2,385.00	210%	680.00	1,024.00	51%
247	1,015.00	2,993.00	195%	869.00	886.00	2%
248	964.00	2,811.00	192%	810.00	1,415.00	75%
249	627.00	667.00	6%	627.00	667.00	6%
250	788.00	2,992.00	280%	670.00	882.00	32%
251	1,040.00	2,671.00	157%	680.00	882.00	30%
252	1,039.00	1,202.00	16%	800.00	954.00	19%
253	1,090.00	1,250.00	15%	850.00	1,022.00	20%
254	1,024.00	2,672.00	161%	900.00	1,435.00	59%
255	1,041.00	2,576.00	147%	820.00	1,441.00	76%
256	1,529.00	1,751.00	15%	1,250.00	1,559.00	25%
257	1,537.00	2,192.00	43%	1,275.00	1,985.00	56%
258	860.00	2,993.00	248%	810.00	938.00	16%
259	540.00	2,359.00	337%	1,000.00	1,441.00	44%
260	1,041.00	2,672.00	157%	825.00	1,375.00	67%
261	967.00	2,282.00	136%	838.00	1,385.00	65%
262	883.00	1,996.00	126%	1,410.00	1,451.00	3%
263	785.00	901.00	15%	650.00	754.00	16%
264	467.00	477.00	2%	467.00	477.00	2%
265	806.00	2,113.00	162%	667.00	1,020.00	53%
266	830.00	2,969.00	258%	662.00	999.00	51%
267	1,112.00	2,348.00	111%	900.00	1,451.00	61%
268	1,500.00	2,862.00	91%	1,400.00	2,068.00	48%
269	1,059.00	2,300.00	117%	900.00	1,441.00	60%
270	1,030.00	2,671.00	159%	660.00	1,003.00	52%
271	685.00	2,671.00	290%	610.00	947.00	55%
272	745.00	2,651.00	256%	635.00	839.00	32%
273	1,043.00	2,993.00	187%	835.00	911.00	9%
274	666.00	2,367.00	255%	625.00	975.00	56%

EXHIBIT A – PARK PLAZA RENT CEILINGS AND RENT CHARGED
(cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
275	738.00	2,992.00	305%	630.00	726.00	15%
276	1,550.00	2,337.00	51%	1,250.00	2,014.00	61%
277	1,600.00	2,446.00	53%	1,350.00	2,079.00	54%

EXHIBIT B – BARCLAY APARTMENTS RENT CEILINGS AND RENT CHARGED

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
1	1,600.00	2,104.00	32%	1,625.00	1,902.00	17%
2	273.00	314.00	15%	273.00	314.00	15%
3	1,032.00	2,200.00	113%	808.00	1,328.00	64%
4	717.00	2,018.00	181%	717.00	741.00	3%
5	900.00	989.00	10%	795.00	938.00	18%
6	710.00	2,138.00	201%	789.00	1,245.00	58%
7	1,396.00	2,806.00	101%	1,350.00	1,503.00	11%
8	1,493.00	2,002.18	34%	1,493.00	1,990.00	33%
9	1,044.00	1,186.00	14%	877.00	978.00	12%
10	1,023.00	1,243.00	22%	825.00	993.00	20%
11	791.00	1,156.00	46%	775.00	797.00	3%
12	877.00	2,200.00	151%	580.00	1,338.00	131%
13	1,100.00	1,710.00	55%	850.00	1,261.00	48%
14	1,143.00	2,506.00	119%	1,676.00	1,725.00	3%
15	1,575.00	1,850.00	17%	1,575.00	1,817.00	15%
16	925.00	2,200.00	138%	840.00	1,338.00	59%
17	1,062.00	1,567.00	48%	900.00	1,086.00	21%
18	1,040.00	2,018.00	94%	575.00	594.00	3%
19	1,023.00	1,925.00	88%	895.00	1,363.00	52%
20	1,036.00	1,675.00	62%	795.00	1,286.00	62%
21	1,334.00	2,727.00	104%	1,250.00	1,878.00	50%
22	1,594.00	2,307.00	45%	1,600.00	2,206.00	38%
23	863.00	1,226.00	42%	860.00	1,028.00	20%
24	1,033.00	1,754.00	70%	850.00	1,313.00	54%
25	711.00	1,467.00	106%	534.00	761.00	43%
26	1,013.50	1,909.00	88%	810.00	1,085.00	34%
27	1,018.00	1,909.00	88%	800.00	892.00	12%
28	1,262.00	2,435.00	93%	1,262.00	1,287.00	2%
29	1,578.00	2,060.00	31%	1,578.00	1,996.00	26%
30	1,082.00	1,710.00	58%	870.00	1,235.00	42%
31	1,012.00	2,200.00	117%	825.00	1,310.00	59%
32	1,030.00	1,609.00	56%	565.00	746.00	32%
33	834.00	1,909.00	129%	825.00	1,085.00	32%
34	455.00	2,200.00	384%	455.00	522.00	15%
35	1,198.00	2,435.00	103%	1,200.00	1,395.00	16%
36	748.00	853.00	14%	748.00	853.00	14%
37	1,023.00	1,128.21	10%	860.00	912.00	6%
38	555.00	637.00	15%	555.00	637.00	15%
39	295.00	339.00	15%	295.00	339.00	15%

EXHIBIT B – BARCLAY APARTMENTS RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
40	1,005.00	1,909.00	90%	850.00	896.00	5%
41	1,011.00	2,200.00	118%	815.00	1,225.00	50%
42	1,321.00	2,435.00	84%	1,340.00	1,395.00	4%
43	800.00	915.00	14%	800.00	915.00	14%
44	1,111.00	2,138.00	92%	850.00	868.00	2%
45	1,029.00	1,754.00	70%	875.00	1,313.00	50%
46	1,022.00	2,018.00	97%	550.00	736.00	34%
47	551.00	2,200.00	299%	551.00	602.00	9%
48	1,100.00	1,628.00	48%	850.00	1,007.00	18%
49	1,145.00	1,763.00	54%	1,300.00	1,801.00	39%
50	667.00	757.58	14%	667.00	758.00	14%
51	1,040.00	1,096.00	5%	860.00	906.00	5%
52	1,030.00	1,181.00	15%	775.00	954.00	23%
53	1,021.00	1,802.00	76%	550.00	708.00	29%
54	1,044.00	1,186.00	14%	870.00	978.00	12%
55	1,036.00	2,200.00	112%	825.00	1,327.00	61%
56	1,321.00	1,900.00	44%	1,225.00	1,419.00	16%

EXHIBIT C –COLUMBIA PLAZA RENT CEILINGS AND RENT CHARGED

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
1	1,115.00	2,067.00	85%	800.00	997.00	25%
2	1,849.00	3,338.00	81%	805.00	1,550.00	93%
3	656.00	753.00	15%	656.00	753.00	15%
4	1,801.00	2,067.00	15%	730.00	955.00	31%
5	2,829.00	4,563.00	61%	1,350.00	2,300.00	70%
6	2,526.00	2,901.00	15%	727.00	833.00	15%
7	570.00	654.00	15%	570.00	654.00	15%
8	492.00	5,120.00	941%	492.00	1,125.00	129%
9	2,259.00	3,644.00	61%	825.00	1,025.00	24%
10	2,833.00	4,688.00	65%	760.00	1,800.00	137%
11	2,530.00	4,082.00	61%	825.00	1,250.00	52%
12	518.00	2,690.00	419%	518.00	595.00	15%
13	1,438.00	4,571.00	218%	840.00	1,100.00	31%
14	2,833.00	4,080.00	44%	750.00	1,025.00	37%
15	1,552.00	1,783.00	15%	775.00	990.00	28%
16	545.00	627.00	15%	545.00	627.00	15%
17	2,092.00	3,013.00	44%	785.00	1,175.00	50%
18	2,724.00	3,923.00	44%	1,200.00	1,621.00	35%
19	3,167.00	3,779.00	19%	1,260.00	1,575.00	25%
20	1,852.00	4,075.00	120%	1,170.00	1,600.00	37%
21	2,783.00	3,196.00	15%	800.00	960.00	20%
22	1,783.00	2,571.00	44%	900.00	1,550.00	72%
23	2,504.00	3,219.00	29%	1,325.00	1,625.00	23%
24	2,259.00	2,982.00	32%	800.00	950.00	19%
25	2,529.00	4,570.00	81%	800.00	1,000.00	25%
26	1,774.00	4,571.00	158%	825.00	1,650.00	100%
27	3,167.00	4,562.00	44%	1,200.00	1,685.00	40%
28	2,542.00	4,489.00	77%	825.00	1,100.00	33%
29	1,939.00	4,562.00	135%	1,200.00	1,600.00	33%
30	1,577.00	5,723.00	263%	930.00	2,355.00	153%
31	2,833.00	4,570.00	61%	800.00	1,125.00	41%
32	2,530.00	5,120.00	102%	760.00	1,125.00	48%
33	2,829.00	4,563.00	61%	1,200.00	1,500.00	25%
34	2,526.00	4,076.00	61%	1,255.00	1,625.00	29%
35	598.00	687.00	15%	598.00	687.00	15%
36	2,833.00	4,080.00	44%	810.00	1,020.00	26%
37	3,168.00	4,074.00	29%	1,325.00	1,565.00	18%
38	2,392.00	4,321.00	81%	1,325.00	1,565.00	18%
39	1,868.00	3,013.00	61%	825.00	985.00	19%

EXHIBIT C – COLUMBIA PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
40	768.00	882.00	15%	768.00	882.00	15%
41	542.00	3,542.00	554%	542.00	1,660.00	206%
42	2,828.00	3,246.00	15%	960.00	1,172.00	22%
43	2,259.00	4,570.00	102%	825.00	1,100.00	33%
44	1,731.00	3,965.00	129%	950.00	1,621.00	71%
45	739.00	4,395.00	495%	739.00	848.00	15%
46	2,531.00	4,083.00	61%	825.00	1,150.00	39%
47	2,529.00	4,079.00	61%	750.00	950.00	27%
48	3,168.00	5,111.00	61%	1,170.00	1,575.00	35%
49	1,906.00	2,189.00	15%	1,025.00	1,246.00	22%
50	1,611.00	4,080.00	153%	810.00	1,125.00	39%
51	2,260.00	4,992.00	121%	875.00	1,175.00	34%
52	876.00	1,006.00	15%	876.00	1,006.00	15%
53	786.00	903.00	15%	786.00	903.00	15%
54	558.00	641.00	15%	558.00	641.00	15%
55	2,829.00	4,564.00	61%	1,250.00	1,700.00	36%
56	561.00	645.00	15%	561.00	645.00	15%
57	1,476.00	1,695.00	15%	698.00	806.00	15%
58	2,529.00	4,197.00	66%	770.00	1,035.00	34%
59	2,136.00	4,073.00	91%	1,325.00	1,575.00	19%
60	2,828.00	3,246.00	15%	1,100.00	1,309.00	19%
61	2,833.00	4,571.00	61%	775.00	1,050.00	35%
62	2,530.00	3,645.00	44%	925.00	1,850.00	100%
63	3,167.00	3,970.00	25%	1,200.00	1,500.00	25%
64	745.00	855.00	15%	745.00	855.00	15%
65	547.00	629.00	15%	547.00	629.00	15%
66	536.00	4,080.00	661%	536.00	1,100.00	105%
67	745.00	855.00	15%	745.00	855.00	15%
68	761.00	874.00	15%	761.00	874.00	15%
69	2,092.00	3,779.00	81%	760.00	1,025.00	35%
70	2,829.00	3,639.00	29%	945.00	1,600.00	69%
71	563.00	647.00	15%	563.00	647.00	15%
72	2,829.00	4,562.00	61%	1,125.00	1,635.00	45%
73	2,529.00	5,118.00	102%	750.00	1,225.00	63%
74	752.00	864.00	15%	752.00	864.00	15%
75	2,432.00	3,504.00	44%	1,060.00	1,625.00	53%
76	600.00	3,579.00	497%	825.00	1,025.00	24%
77	2,833.00	4,571.00	61%	825.00	1,000.00	21%
78	757.00	4,563.00	503%	757.00	870.00	15%

EXHIBIT C – COLUMBIA PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
79	2,828.00	5,111.00	81%	1,110.00	1,645.00	48%
80	2,260.00	2,596.00	15%	750.00	933.00	24%
81	2,530.00	4,081.00	61%	775.00	1,100.00	42%
82	738.00	847.00	15%	738.00	847.00	15%
83	757.00	870.00	15%	757.00	870.00	15%
84	1,984.00	4,977.00	151%	825.00	1,025.00	24%
85	1,476.00	1,695.00	15%	956.00	1,174.00	23%
86	1,994.00	3,162.00	59%	1,025.00	1,725.00	68%
87	2,828.00	4,562.00	61%	1,130.00	1,625.00	44%
88	571.00	4,490.00	686%	571.00	1,800.00	215%
89	756.00	868.00	15%	756.00	868.00	15%
90	3,060.00	5,531.00	81%	1,200.00	1,650.00	38%
91	2,833.00	4,455.00	57%	850.00	1,650.00	94%
92	2,834.00	5,120.00	81%	810.00	1,175.00	45%
93	876.00	1,006.00	15%	876.00	1,006.00	15%
94	758.00	871.00	15%	758.00	871.00	15%
95	2,833.00	5,118.00	81%	835.00	1,000.00	20%
96	2,259.00	3,643.00	61%	840.00	1,050.00	25%
97	1,233.00	5,109.00	314%	975.00	1,650.00	69%
98	757.00	870.00	15%	757.00	870.00	15%
99	2,092.00	3,374.00	61%	775.00	1,100.00	42%
100	3,167.00	5,722.00	81%	1,230.00	1,575.00	28%
101	1,585.00	1,820.00	15%	885.00	1,086.00	23%
102	779.00	896.00	15%	779.00	896.00	15%
103	522.00	599.00	15%	522.00	599.00	15%
104	709.00	3,965.00	459%	709.00	1,625.00	129%
105	2,724.00	4,395.00	61%	1,240.00	1,700.00	37%
106	2,259.00	4,572.00	102%	825.00	1,175.00	42%
107	2,529.00	3,549.00	40%	785.00	900.00	15%
108	770.00	5,688.00	639%	770.00	1,600.00	108%
109	3,115.00	4,486.00	44%	1,250.00	1,645.00	32%
110	563.00	647.00	15%	500.00	647.00	29%
111	1,145.00	1,314.00	15%	730.00	910.00	25%
112	2,172.00	4,076.00	88%	1,080.00	1,575.00	46%
113	2,433.00	3,504.00	44%	1,110.00	1,625.00	46%
114	2,833.00	4,569.00	61%	765.00	1,125.00	47%
115	2,526.00	4,564.00	81%	1,130.00	1,685.00	49%
116	1,417.00	3,886.00	174%	1,325.00	1,571.00	19%
117	2,828.00	5,722.00	102%	1,425.00	2,350.00	65%

EXHIBIT C – COLUMBIA PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
118	2,259.00	4,488.00	99%	825.00	1,000.00	21%
119	2,432.00	4,562.00	88%	1,260.00	1,700.00	35%
120	782.00	4,408.00	464%	782.00	1,700.00	117%
121	3,003.00	4,843.00	61%	810.00	1,020.00	26%
122	2,833.00	3,252.00	15%	775.00	961.00	24%
123	779.00	4,073.00	423%	1,350.00	1,605.00	19%
124	3,167.00	4,562.00	44%	1,280.00	1,625.00	27%
125	2,833.00	4,570.00	61%	860.00	1,020.00	19%
126	2,259.00	4,080.00	81%	785.00	1,150.00	46%
127	2,828.00	4,562.00	61%	1,200.00	1,452.00	21%
128	1,380.00	3,860.00	180%	975.00	1,625.00	67%
129	597.00	4,233.00	609%	597.00	1,075.00	80%
130	2,828.00	4,562.00	61%	1,200.00	1,700.00	42%
131	597.00	686.00	15%	597.00	686.00	15%
132	3,168.00	5,110.00	61%	1,275.00	1,700.00	33%
133	2,259.00	4,571.00	102%	800.00	1,025.00	28%
134	2,432.00	3,965.00	63%	1,110.00	1,625.00	46%
135	2,319.00	3,927.00	69%	1,325.00	1,700.00	28%
136	2,259.00	4,572.00	102%	850.00	1,045.00	23%
137	2,833.00	3,252.00	15%	775.00	1,100.00	42%
138	2,828.00	3,636.00	29%	1,030.00	1,550.00	50%
139	1,650.00	5,111.00	210%	1,250.00	1,625.00	30%
140	575.00	661.00	15%	575.00	661.00	15%
141	2,833.00	4,081.00	44%	775.00	1,000.00	29%
142	2,172.00	4,076.00	88%	1,325.00	1,625.00	23%
143	2,432.00	3,965.00	63%	1,040.00	1,500.00	44%
144	2,259.00	4,568.00	102%	790.00	1,025.00	30%
145	3,167.00	5,109.00	61%	1,325.00	1,625.00	23%
146	615.00	3,887.00	532%	1,145.00	1,475.00	29%
147	841.00	965.00	15%	841.00	965.00	15%
148	563.00	647.00	15%	563.00	647.00	15%
149	2,432.00	4,562.00	88%	1,200.00	1,550.00	29%
150	2,828.00	5,109.00	81%	1,275.00	1,675.00	31%
151	2,833.00	4,989.00	76%	825.00	1,025.00	24%
152	2,833.00	3,252.00	15%	825.00	995.00	21%
153	2,014.00	2,313.00	15%	985.00	1,201.00	22%
154	2,526.00	5,109.00	102%	1,065.00	1,600.00	50%
155	1,149.00	4,081.00	255%	785.00	995.00	27%
156	1,023.00	1,174.00	15%	770.00	956.00	24%

EXHIBIT C – COLUMBIA PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
157	792.00	910.00	15%	792.00	910.00	15%
158	2,172.00	4,323.00	99%	1,115.00	1,625.00	46%
159	1,869.00	4,114.00	120%	750.00	1,021.00	36%
160	2,829.00	3,639.00	29%	1,050.00	1,492.00	42%
161	611.00	702.00	15%	611.00	702.00	15%
162	2,525.00	2,901.00	15%	1,035.00	1,264.00	22%
163	1,225.00	1,407.00	15%	755.00	938.00	24%
164	2,172.00	3,129.00	44%	1,200.00	1,550.00	29%
165	2,724.00	4,333.00	59%	1,200.00	1,575.00	31%
166	2,833.00	4,570.00	61%	800.00	1,045.00	31%
167	2,833.00	5,732.00	102%	845.00	1,125.00	33%
168	2,829.00	5,688.00	101%	1,350.00	1,645.00	22%
169	2,828.00	5,723.00	102%	1,325.00	1,600.00	21%
170	2,833.00	3,644.00	29%	825.00	990.00	20%
171	2,833.00	4,080.00	44%	800.00	1,200.00	50%
172	2,432.00	4,076.00	68%	1,155.00	1,675.00	45%
173	1,999.00	3,965.00	98%	1,325.00	1,600.00	21%
174	529.00	607.00	15%	529.00	607.00	15%
175	3,167.00	5,109.00	61%	1,205.00	1,700.00	41%
176	1,587.00	3,887.00	145%	1,325.00	1,580.00	19%
177	1,652.00	5,109.00	209%	1,005.00	1,625.00	62%
178	1,609.00	3,641.00	126%	725.00	1,025.00	41%
179	2,432.00	3,128.00	29%	1,155.00	1,665.00	44%
180	3,177.00	5,723.00	80%	1,300.00	1,592.00	22%
181	2,530.00	3,644.00	44%	850.00	995.00	17%
182	594.00	682.00	15%	594.00	682.00	15%
183	2,828.00	4,072.00	44%	1,250.00	1,525.00	22%
184	932.00	1,070.00	15%	932.00	1,070.00	15%
185	1,609.00	4,570.00	184%	790.00	1,020.00	29%
186	1,144.00	4,010.00	251%	900.00	1,625.00	81%
187	793.00	911.00	15%	793.00	911.00	15%
188	2,432.00	4,323.00	78%	1,000.00	1,600.00	60%
189	1,668.00	1,915.00	15%	675.00	848.00	26%
190	1,474.00	4,074.00	176%	940.00	1,700.00	81%
191	1,416.00	4,504.00	218%	1,550.00	2,450.00	58%
192	817.00	938.00	15%	817.00	938.00	15%
193	3,173.00	4,081.00	29%	775.00	953.00	23%
194	1,464.00	3,540.00	142%	1,060.00	1,700.00	60%
195	793.00	911.00	15%	793.00	911.00	15%

EXHIBIT C – COLUMBIA PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
196	2,833.00	4,571.00	61%	825.00	1,025.00	24%
197	1,609.00	4,490.00	179%	860.00	1,050.00	22%
198	3,168.00	6,371.00	101%	1,200.00	1,700.00	42%
199	3,168.00	5,110.00	61%	1,240.00	1,650.00	33%
200	2,833.00	4,080.00	44%	785.00	1,025.00	31%
201	583.00	669.00	15%	583.00	669.00	15%
202	2,432.00	4,396.00	81%	1,225.00	1,625.00	33%
203	1,939.00	3,965.00	104%	1,055.00	2,450.00	132%
204	2,530.00	4,568.00	81%	780.00	950.00	22%
205	2,828.00	4,564.00	61%	1,230.00	1,452.00	18%
206	1,587.00	3,967.00	150%	1,030.00	2,375.00	131%
207	2,776.00	3,570.00	29%	1,200.00	1,600.00	33%
208	583.00	669.00	15%	583.00	669.00	15%
209	835.00	958.00	15%	835.00	958.00	15%
210	820.00	942.00	15%	820.00	942.00	15%
211	2,833.00	4,081.00	44%	800.00	1,020.00	28%
212	2,259.00	5,118.00	127%	900.00	1,725.00	92%
213	917.00	4,561.00	397%	917.00	1,600.00	74%
214	2,829.00	4,864.00	72%	1,400.00	1,650.00	18%
215	594.00	4,570.00	669%	594.00	1,050.00	77%
216	2,529.00	4,079.00	61%	860.00	1,100.00	28%
217	876.00	1,006.00	15%	876.00	1,006.00	15%
218	1,939.00	3,860.00	99%	1,135.00	1,300.00	15%
219	1,868.00	4,114.00	120%	800.00	995.00	24%
220	881.00	1,012.00	15%	881.00	1,012.00	15%
221	2,226.00	2,556.00	15%	1,210.00	1,469.00	21%
222	3,167.00	4,073.00	29%	1,210.00	1,740.00	44%
223	652.00	749.00	15%	652.00	749.00	15%
224	2,752.00	4,440.00	61%	1,080.00	1,700.00	57%
225	2,432.00	3,504.00	44%	1,275.00	1,700.00	33%
226	1,778.00	4,561.00	157%	785.00	1,100.00	40%
227	581.00	667.00	15%	581.00	667.00	15%
228	2,526.00	2,901.00	15%	1,075.00	1,309.00	22%
229	3,167.00	4,074.00	29%	1,055.00	1,286.00	22%
230	2,530.00	4,080.00	61%	845.00	1,075.00	27%
231	2,529.00	4,571.00	81%	845.00	1,125.00	33%
232	1,731.00	4,564.00	164%	980.00	1,685.00	72%
233	2,432.00	4,440.00	83%	1,175.00	1,650.00	40%
234	2,783.00	3,641.00	31%	785.00	1,050.00	34%

EXHIBIT C – COLUMBIA PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
235	2,829.00	3,248.00	15%	1,250.00	1,508.00	21%
236	2,227.00	4,443.00	100%	1,325.00	2,375.00	79%
237	3,168.00	4,564.00	44%	1,375.00	1,650.00	20%
238	619.00	710.00	15%	619.00	710.00	15%
239	2,828.00	5,109.00	81%	1,375.00	1,650.00	20%
240	3,170.00	4,236.00	34%	1,450.00	1,650.00	14%
241	2,259.00	4,569.00	102%	800.00	1,050.00	31%
242	2,259.00	4,081.00	81%	850.00	990.00	16%
243	2,014.00	4,073.00	102%	1,000.00	1,625.00	63%
244	973.00	5,111.00	425%	973.00	1,600.00	64%
245	1,437.00	4,081.00	184%	740.00	1,025.00	39%
246	624.00	715.00	15%	624.00	715.00	15%
247	2,828.00	4,562.00	61%	1,375.00	1,625.00	18%
248	1,545.00	3,860.00	150%	1,030.00	1,625.00	58%
249	978.00	4,741.00	385%	754.00	1,200.00	59%
250	908.00	4,562.00	402%	908.00	1,700.00	87%
251	2,187.00	4,504.00	106%	1,350.00	2,400.00	78%
252	893.00	1,025.00	15%	893.00	1,025.00	15%
253	606.00	5,120.00	745%	606.00	1,175.00	94%
254	873.00	1,003.00	15%	873.00	1,003.00	15%
255	984.00	1,130.00	15%	984.00	1,130.00	15%
256	2,530.00	4,572.00	81%	825.00	1,175.00	42%
257	2,833.00	4,570.00	61%	950.00	1,725.00	82%
258	1,357.00	1,559.00	15%	950.00	1,138.00	20%
259	2,771.00	4,969.00	79%	1,350.00	1,715.00	27%
260	2,017.00	3,644.00	81%	805.00	1,007.00	25%
261	2,833.00	4,081.00	44%	860.00	1,000.00	16%
262	2,526.00	4,561.00	81%	1,155.00	1,710.00	48%
263	3,168.00	4,564.00	44%	1,280.00	1,625.00	27%
264	2,529.00	3,251.00	29%	770.00	961.00	25%
265	2,474.00	2,841.00	15%	1,145.00	1,329.00	16%
266	1,952.00	4,976.00	155%	1,500.00	2,400.00	60%

EXHIBIT D – CLEVELAND HOUSE RENT CEILINGS AND RENT CHARGED

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
1	3,797.00	6,629.00	75%	964.00	1,787.00	75%
2	4,764.00	5,611.00	18%	1,450.00	2,105.00	45%
3	3,686.00	4,859.00	32%	1,060.00	1,725.00	63%
4	3,291.00	8,330.00	153%	965.00	1,552.00	61%
5	4,863.00	5,726.00	18%	957.00	1,660.00	73%
6	5,970.00	7,034.00	18%	1,030.00	1,526.00	48%
7	4,255.00	5,611.00	32%	1,681.00	2,150.00	28%
8	3,774.00	8,330.00	121%	966.00	1,675.00	73%
9	3,475.00	7,036.00	102%	1,441.00	1,787.00	24%
10	4,180.00	5,511.00	32%	1,000.00	1,530.00	53%
11	5,970.00	7,034.00	18%	1,040.00	1,676.00	61%
12	4,254.00	7,726.00	82%	990.00	1,695.00	71%
13	5,628.00	6,629.00	18%	985.00	1,513.00	54%
14	4,763.00	5,610.00	18%	1,005.00	1,523.00	52%
15	5,444.00	6,412.00	18%	971.00	1,635.00	68%
16	3,285.00	4,330.00	32%	1,880.00	3,230.00	72%
17	4,255.00	8,330.00	96%	1,004.00	1,648.00	64%
18	737.00	861.00	17%	737.00	839.00	14%
19	733.00	855.00	17%	722.00	833.00	15%
20	6,314.00	7,438.00	18%	1,040.00	1,890.00	82%
21	2,506.00	4,781.00	91%	800.00	1,166.00	46%
22	3,330.00	6,162.00	85%	1,591.00	2,113.00	33%
23	4,173.00	5,502.00	32%	1,516.00	2,280.00	50%
24	2,586.00	4,781.00	85%	800.00	1,166.00	46%
25	808.00	946.00	17%	808.00	921.00	14%
26	4,137.00	6,107.00	48%	1,052.00	1,581.00	50%
27	3,727.00	5,500.00	48%	1,410.00	2,745.00	95%
28	2,895.00	4,270.00	47%	840.00	1,400.00	67%
29	5,408.00	6,370.00	18%	994.00	1,573.00	58%
30	4,254.00	8,330.00	96%	990.00	1,675.00	69%
31	5,445.00	6,413.00	18%	1,005.00	1,405.00	40%
32	5,970.00	7,034.00	18%	985.00	1,645.00	67%
33	3,800.00	6,282.00	65%	1,460.00	2,252.00	54%
34	821.00	959.00	17%	821.00	934.00	14%
35	6,314.00	7,438.00	18%	990.00	1,490.00	51%
36	4,763.00	5,610.00	18%	1,047.00	1,565.00	49%
37	3,280.00	8,330.00	154%	1,000.00	1,690.00	69%
38	4,139.00	6,282.00	52%	1,244.00	2,096.00	68%
39	3,467.00	5,116.00	48%	910.00	1,885.00	107%

EXHIBIT D – CLEVELAND HOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
40	4,764.00	6,282.00	32%	1,255.00	2,190.00	75%
41	743.00	7,438.00	901%	743.00	1,540.00	107%
42	4,763.00	5,610.00	18%	999.00	2,661.00	166%
43	6,097.00	7,183.00	18%	980.00	1,741.00	78%
44	3,383.00	3,981.00	18%	1,000.00	1,495.00	50%
45	5,322.00	6,280.00	18%	975.00	1,527.00	57%
46	6,314.00	7,438.00	18%	999.00	1,495.00	50%
47	3,285.00	4,328.00	32%	1,850.00	2,266.00	22%
48	5,332.00	6,280.00	18%	975.00	1,726.00	77%
49	4,763.00	6,280.00	32%	968.00	1,495.00	54%
50	5,535.00	6,520.00	18%	1,000.00	1,745.00	75%
51	5,444.00	6,412.00	18%	990.00	1,718.00	74%
52	661.00	5,355.00	710%	661.00	1,149.00	74%
53	2,643.00	6,162.00	133%	1,400.00	2,176.00	55%
54	4,672.00	5,502.00	18%	1,375.00	2,150.00	56%
55	2,586.00	5,355.00	107%	809.00	1,183.00	46%
56	4,254.00	5,608.00	32%	1,004.00	1,510.00	50%
57	5,445.00	6,413.00	18%	1,004.00	1,750.00	74%
58	3,727.00	5,501.00	48%	1,400.00	2,470.00	76%
59	4,863.00	5,726.00	18%	1,434.00	2,158.00	50%
60	4,255.00	5,610.00	32%	1,024.00	1,403.00	37%
61	5,187.00	6,109.00	18%	802.00	1,325.00	65%
62	2,295.00	7,036.00	207%	1,291.00	2,400.00	86%
63	3,726.00	5,498.00	48%	1,771.00	2,330.00	32%
64	741.00	8,330.00	1024%	741.00	843.00	14%
65	4,764.00	6,282.00	32%	1,651.00	2,095.00	27%
66	6,196.00	7,299.00	18%	1,040.00	1,435.00	38%
67	3,479.00	6,282.00	81%	1,400.00	2,572.00	84%
68	4,764.00	5,611.00	18%	1,441.00	1,882.00	31%
69	3,383.00	4,458.00	32%	950.00	1,505.00	58%
70	5,535.00	6,520.00	18%	1,004.00	1,488.00	48%
71	743.00	8,330.00	1021%	743.00	1,695.00	128%
72	743.00	869.00	17%	733.00	846.00	15%
73	4,255.00	5,611.00	32%	1,435.00	2,131.00	49%
74	6,097.00	7,183.00	18%	1,030.00	1,765.00	71%
75	4,140.00	6,282.00	52%	1,249.00	2,425.00	94%
76	6,314.00	7,438.00	18%	1,035.00	1,355.00	31%
77	6,314.00	7,438.00	18%	1,030.00	1,575.00	53%
78	4,863.00	5,726.00	18%	1,014.00	1,670.00	65%

EXHIBIT D – CLEVELAND HOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
79	2,589.00	8,330.00	222%	1,050.00	1,650.00	57%
80	5,628.00	6,629.00	18%	1,004.00	1,504.00	50%
81	3,787.00	8,330.00	120%	1,010.00	1,631.00	61%
82	1,856.00	2,181.00	18%	1,661.00	1,863.00	12%
83	6,314.00	7,438.00	18%	999.00	1,334.00	34%
84	4,753.00	6,281.00	32%	967.00	1,645.00	70%
85	4,254.00	5,007.00	18%	946.00	1,158.00	22%
86	904.00	8,111.00	797%	904.00	1,670.00	85%
87	2,895.00	5,355.00	85%	600.00	1,070.00	78%
88	4,672.00	5,502.00	18%	1,485.00	2,079.00	40%
89	4,672.00	6,162.00	32%	1,460.00	2,163.00	48%
90	2,895.00	5,355.00	85%	847.00	1,178.00	39%
91	715.00	8,330.00	1065%	705.00	1,650.00	134%
92	3,787.00	4,458.00	18%	1,014.00	1,500.00	48%
93	2,973.00	6,898.00	132%	1,229.00	2,335.00	90%
94	3,727.00	6,898.00	85%	1,470.00	2,665.00	81%
95	4,763.00	5,610.00	18%	1,014.00	1,445.00	43%
96	3,291.00	8,330.00	153%	927.00	1,175.00	27%
97	6,314.00	7,438.00	18%	1,020.00	1,595.00	56%
98	2,142.00	7,036.00	228%	1,409.00	2,475.00	76%
99	2,703.00	6,898.00	155%	1,480.00	2,156.00	46%
100	3,800.00	5,610.00	48%	1,014.00	1,695.00	67%
101	982.00	8,330.00	748%	982.00	1,320.00	34%
102	4,255.00	5,611.00	32%	1,041.00	1,501.00	44%
103	4,255.00	6,282.00	48%	1,413.00	2,091.00	48%
104	4,254.00	5,607.00	32%	1,051.00	1,410.00	34%
105	1,026.00	6,282.00	512%	1,015.00	2,111.00	108%
106	2,831.00	6,282.00	122%	1,404.00	1,990.00	42%
107	4,255.00	5,611.00	32%	961.00	1,657.00	72%
108	3,787.00	5,591.00	48%	1,030.00	1,468.00	43%
109	6,302.00	7,423.00	18%	1,048.00	1,313.00	25%
110	5,559.00	7,333.00	32%	1,040.00	1,626.00	56%
111	919.00	1,076.00	17%	909.00	1,027.00	13%
112	6,314.00	7,438.00	18%	976.00	1,640.00	68%
113	4,764.00	5,611.00	18%	1,450.00	2,091.00	44%
114	742.00	7,438.00	902%	1,040.00	2,060.00	98%
115	6,185.00	7,287.00	18%	1,030.00	1,462.00	42%
116	4,679.00	5,511.00	18%	1,025.00	1,658.00	62%
117	5,332.00	7,034.00	32%	1,070.00	1,650.00	54%

EXHIBIT D – CLEVELAND HOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
118	4,768.00	5,616.00	18%	1,030.00	1,660.00	61%
119	3,178.00	8,330.00	162%	1,018.00	1,649.00	62%
120	2,601.00	4,848.00	86%	1,694.00	3,014.00	78%
121	4,634.00	6,110.00	32%	1,018.00	1,628.00	60%
122	5,912.00	6,964.00	18%	1,036.00	1,607.00	55%
123	3,654.00	5,394.00	48%	1,020.00	1,575.00	54%
124	5,445.00	6,413.00	18%	1,028.00	1,597.00	55%
125	627.00	732.00	17%	627.00	713.00	14%
126	1,134.00	1,330.00	17%	1,122.00	1,198.00	7%
127	3,727.00	6,898.00	85%	1,407.00	2,196.00	56%
128	1,091.00	1,280.00	17%	830.00	989.00	19%
129	6,314.00	7,438.00	18%	1,037.00	1,838.00	77%
130	3,330.00	3,919.00	18%	1,052.00	1,452.00	38%
131	3,332.00	5,504.00	65%	1,479.00	2,550.00	72%
132	1,054.00	6,162.00	485%	1,043.00	2,309.00	121%
133	881.00	8,330.00	846%	856.00	1,591.00	86%
134	4,965.00	6,548.00	32%	1,030.00	1,596.00	55%
135	6,191.00	7,293.00	18%	1,022.00	1,710.00	67%
136	945.00	1,107.00	17%	935.00	1,063.00	14%
137	4,672.00	5,502.00	18%	1,531.00	2,379.00	55%
138	5,559.00	6,548.00	18%	1,040.00	1,695.00	63%
139	1,915.00	2,252.00	18%	1,105.00	1,516.00	37%
140	4,763.00	5,610.00	18%	1,040.00	1,678.00	61%
141	3,395.00	7,036.00	107%	1,248.00	1,815.00	45%
142	1,173.00	8,330.00	610%	1,043.00	1,299.00	25%
143	4,764.00	5,611.00	18%	1,480.00	2,580.00	74%
144	2,461.00	2,894.00	18%	1,338.00	1,941.00	45%
145	4,763.00	5,610.00	18%	1,082.00	1,548.00	43%
146	6,185.00	7,287.00	18%	1,042.00	1,632.00	57%
147	3,358.00	8,330.00	148%	1,040.00	2,120.00	104%
148	6,142.00	7,235.00	18%	1,031.00	1,495.00	45%
149	4,764.00	6,282.00	32%	1,358.00	2,165.00	59%
150	3,161.00	5,222.00	65%	1,015.00	1,749.00	72%
151	4,255.00	6,282.00	48%	1,382.00	2,330.00	69%
152	3,471.00	5,122.00	48%	1,061.00	1,670.00	57%
153	6,314.00	7,438.00	18%	1,030.00	1,433.00	39%
154	4,634.00	6,110.00	32%	1,020.00	1,916.00	88%
155	5,444.00	6,412.00	18%	1,001.00	1,670.00	67%
156	6,098.00	7,184.00	18%	1,071.00	1,450.00	35%

EXHIBIT D – CLEVELAND HOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
157	3,383.00	3,981.00	18%	1,020.00	1,765.00	73%
158	1,575.00	1,849.00	17%	1,548.00	1,699.00	10%
159	3,686.00	8,330.00	126%	955.00	1,759.00	84%
160	5,187.00	6,841.00	32%	1,035.00	1,665.00	61%
161	4,763.00	6,280.00	32%	1,051.00	1,665.00	58%
162	4,763.00	6,280.00	32%	1,030.00	1,546.00	50%
163	2,311.00	4,781.00	107%	808.00	1,187.00	47%
164	4,672.00	6,898.00	48%	1,381.00	2,190.00	59%
165	3,727.00	4,387.00	18%	1,456.00	1,979.00	36%
166	2,895.00	5,355.00	85%	870.00	1,186.00	36%
167	6,314.00	7,438.00	18%	1,097.00	1,690.00	54%
168	3,787.00	8,330.00	120%	974.00	1,555.00	60%
169	3,330.00	6,898.00	107%	1,490.00	2,415.00	62%
170	4,058.00	6,007.00	48%	1,253.00	2,701.00	116%
171	6,314.00	7,438.00	18%	990.00	1,855.00	87%
172	4,763.00	5,610.00	18%	1,037.00	1,591.00	53%
173	746.00	8,330.00	1017%	736.00	1,532.00	108%
174	3,033.00	6,282.00	107%	1,401.00	2,146.00	53%
175	3,328.00	6,162.00	85%	1,500.00	2,580.00	72%
176	6,314.00	8,330.00	32%	1,071.00	1,701.00	59%
177	4,763.00	5,610.00	18%	1,014.00	1,898.00	87%
178	3,155.00	8,330.00	164%	1,000.00	1,735.00	74%
179	1,621.00	5,427.00	235%	1,426.00	3,585.00	151%
180	4,764.00	6,282.00	32%	1,356.00	2,112.00	56%
181	6,314.00	7,438.00	18%	1,050.00	1,610.00	53%
182	3,395.00	3,997.00	18%	1,346.00	2,100.00	56%
183	2,912.00	3,836.00	32%	1,715.00	2,690.00	57%
184	1,447.00	5,355.00	270%	804.00	1,395.00	74%
185	3,728.00	6,898.00	85%	1,564.00	2,095.00	34%
186	4,671.00	6,160.00	32%	1,490.00	2,480.00	66%
187	2,586.00	5,354.00	107%	807.00	1,370.00	70%
188	3,184.00	8,330.00	162%	1,010.00	1,610.00	59%
189	758.00	8,330.00	999%	743.00	1,205.00	62%
190	4,172.00	6,162.00	48%	1,480.00	2,755.00	86%
191	2,973.00	4,912.00	65%	1,297.00	2,355.00	82%
192	6,196.00	7,299.00	18%	1,050.00	1,637.00	56%
193	3,116.00	8,330.00	167%	1,022.00	1,550.00	52%
194	6,131.00	7,222.00	18%	1,030.00	1,485.00	44%
195	4,140.00	5,456.00	32%	1,458.00	2,285.00	57%

EXHIBIT D – CLEVELAND HOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
196	1,200.00	1,407.00	17%	1,179.00	1,339.00	14%
197	3,558.00	8,330.00	134%	1,030.00	1,629.00	58%
198	5,628.00	6,629.00	18%	870.00	1,667.00	92%
199	4,661.00	5,489.00	18%	1,018.00	1,528.00	50%
200	3,159.00	6,282.00	99%	1,520.00	2,100.00	38%
201	5,444.00	7,181.00	32%	1,050.00	1,703.00	62%
202	1,070.00	1,254.00	17%	1,059.00	1,167.00	10%
203	4,763.00	5,610.00	18%	1,092.00	1,693.00	55%
204	4,255.00	5,611.00	32%	1,490.00	2,265.00	52%
205	5,296.00	6,238.00	18%	1,008.00	1,717.00	70%
206	5,535.00	6,520.00	18%	1,070.00	1,527.00	43%
207	2,895.00	5,355.00	85%	880.00	1,280.00	45%
208	2,502.00	6,898.00	176%	1,558.00	2,415.00	55%
209	1,652.00	1,941.00	17%	1,486.00	1,728.00	16%
210	2,248.00	4,781.00	113%	819.00	1,285.00	57%
211	5,445.00	6,413.00	18%	1,060.00	2,080.00	96%
212	6,314.00	7,438.00	18%	1,045.00	1,544.00	48%
213	4,672.00	6,162.00	32%	1,521.00	2,336.00	54%
214	1,854.00	6,898.00	272%	1,485.00	2,259.00	52%

EXHIBIT E –THE RITTENHOUSE RENT CEILINGS AND RENT CHARGED

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
1	833.00	2,648.00	218%	780.00	1,555.00	99%
2	677.00	2,956.00	337%	659.00	1,600.00	143%
3	1,102.00	2,733.00	148%	819.00	1,500.00	83%
4	888.00	2,374.00	167%	699.00	1,230.00	76%
5	888.00	1,142.00	29%	741.00	1,052.00	42%
6	740.00	954.00	29%	695.00	890.00	28%
7	828.00	1,059.00	28%	805.00	987.00	23%
8	553.00	730.00	32%	519.00	682.00	31%
9	858.00	2,128.00	148%	715.00	1,160.00	62%
10	697.00	2,095.00	201%	665.00	1,658.00	149%
11	1,204.00	1,522.00	26%	1,025.00	1,413.00	38%
12	534.00	1,392.00	161%	519.00	1,000.00	93%
13	984.00	1,764.00	79%	817.00	1,451.00	78%
14	1,102.00	3,051.00	177%	819.00	1,475.00	80%
15	984.00	1,765.00	79%	856.00	1,454.00	70%
16	970.00	2,651.00	173%	795.00	1,152.00	45%
17	888.00	1,535.00	73%	741.00	1,138.00	54%
18	722.00	943.00	31%	702.00	879.00	25%
19	1,179.00	1,491.00	26%	1,016.00	1,435.00	41%
20	608.00	1,922.00	216%	591.00	1,275.00	116%
21	1,077.00	2,960.00	175%	795.00	1,195.00	50%
22	1,176.00	1,878.00	60%	995.00	1,532.00	54%
23	1,338.00	1,682.00	26%	1,025.00	1,418.00	38%
24	434.00	596.00	37%	422.00	558.00	32%
25	995.00	2,448.00	146%	845.00	1,451.00	72%
26	800.00	2,448.00	206%	778.00	1,525.00	96%
27	637.00	831.00	30%	620.00	775.00	25%
28	800.00	1,024.00	28%	778.00	981.00	26%
29	709.00	2,960.00	317%	647.00	1,220.00	89%
30	1,234.00	1,559.00	26%	895.00	1,370.00	53%
31	1,067.00	2,095.00	96%	841.00	1,306.00	55%
32	1,013.00	2,956.00	192%	873.00	1,550.00	78%
33	794.00	1,028.00	29%	733.00	931.00	27%
34	1,086.00	2,374.00	119%	795.00	1,230.00	55%
35	859.00	1,107.00	29%	715.00	975.00	36%
36	797.00	1,021.00	28%	775.00	996.00	29%
37	637.00	840.00	32%	620.00	820.00	32%
38	1,086.00	2,374.00	119%	795.00	1,170.00	47%
39	519.00	2,960.00	470%	505.00	1,145.00	127%

EXHIBIT E – THE RITTENHOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
40	747.00	962.00	29%	727.00	921.00	27%
41	1,091.00	1,387.00	27%	1,015.00	1,260.00	24%
42	708.00	926.00	31%	689.00	864.00	25%
43	794.00	2,651.00	234%	733.00	1,195.00	63%
44	819.00	1,059.00	29%	878.00	1,025.00	17%
45	677.00	2,956.00	337%	659.00	1,600.00	143%
46	1,086.00	2,128.00	96%	745.00	1,160.00	56%
47	1,234.00	1,483.00	20%	895.00	1,250.00	40%
48	895.00	1,149.00	28%	838.00	1,121.00	34%
49	833.00	1,065.00	28%	764.00	1,037.00	36%
50	637.00	831.00	30%	570.00	775.00	36%
51	708.00	2,651.00	274%	676.00	1,220.00	80%
52	1,102.00	1,399.00	27%	819.00	1,305.00	59%
53	794.00	1,028.00	29%	644.00	985.00	53%
54	794.00	1,028.00	29%	733.00	972.00	33%
55	1,499.00	3,302.00	120%	925.00	1,650.00	78%
56	836.00	1,069.00	28%	798.00	1,043.00	31%
57	794.00	1,028.00	29%	733.00	998.00	36%
58	565.00	2,128.00	277%	550.00	1,200.00	118%
59	1,077.00	2,960.00	175%	795.00	1,195.00	50%
60	1,234.00	3,051.00	147%	945.00	1,525.00	61%
61	576.00	1,584.00	175%	560.00	1,340.00	139%
62	961.00	2,651.00	176%	762.00	1,104.00	45%
63	961.00	2,077.00	116%	742.00	1,150.00	55%
64	702.00	1,685.00	140%	702.00	1,512.00	115%
65	871.00	1,123.00	29%	847.00	1,046.00	23%
66	977.00	1,548.00	58%	795.00	1,259.00	58%
67	794.00	2,374.00	199%	733.00	1,170.00	60%
68	747.00	2,095.00	180%	727.00	1,825.00	151%
69	832.00	1,064.00	28%	807.00	1,038.00	29%
70	1,086.00	2,128.00	96%	775.00	1,165.00	50%
71	1,234.00	3,408.00	176%	895.00	1,350.00	51%
72	637.00	2,194.00	244%	620.00	1,400.00	126%
73	1,234.00	1,764.00	43%	895.00	1,450.00	62%
74	637.00	840.00	32%	620.00	820.00	32%
75	859.00	2,651.00	209%	745.00	1,220.00	64%
76	1,234.00	1,764.00	43%	895.00	1,340.00	50%
77	859.00	2,960.00	245%	745.00	1,220.00	64%
78	1,013.00	2,956.00	192%	873.00	1,600.00	83%

EXHIBIT E – THE RITTENHOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
79	550.00	1,250.00	127%	524.00	1,025.00	96%
80	1,003.00	2,733.00	172%	817.00	1,475.00	81%
81	961.00	1,229.00	28%	745.00	1,154.00	55%
82	1,077.00	2,960.00	175%	699.00	1,191.00	70%
83	835.00	1,874.00	124%	812.00	1,490.00	83%
84	1,499.00	3,302.00	120%	925.00	1,625.00	76%
85	961.00	1,635.00	70%	745.00	1,161.00	56%
86	1,077.00	2,651.00	146%	745.00	1,220.00	64%
87	859.00	2,651.00	209%	699.00	1,320.00	89%
88	800.00	1,036.00	30%	778.00	1,011.00	30%
89	1,234.00	2,448.00	98%	925.00	1,450.00	57%
90	519.00	698.00	34%	505.00	682.00	35%
91	859.00	2,651.00	209%	729.00	1,095.00	50%
92	1,095.00	1,381.00	26%	995.00	1,341.00	35%
93	828.00	1,661.00	101%	805.00	1,451.00	80%
94	858.00	1,922.00	124%	751.00	1,217.00	62%
95	608.00	796.00	31%	591.00	743.00	26%
96	1,095.00	1,392.00	27%	995.00	1,357.00	36%
97	833.00	3,301.00	296%	810.00	1,575.00	94%
98	708.00	2,651.00	274%	676.00	1,195.00	77%
99	746.00	2,733.00	266%	726.00	1,500.00	107%
100	746.00	972.00	30%	726.00	906.00	25%
101	722.00	943.00	31%	702.00	879.00	25%
102	637.00	831.00	30%	620.00	796.00	28%
103	888.00	1,142.00	29%	715.00	1,073.00	50%
104	637.00	831.00	30%	620.00	796.00	28%
105	519.00	2,128.00	310%	505.00	1,175.00	133%
106	1,013.00	2,373.00	134%	893.00	1,525.00	71%
107	550.00	1,240.00	125%	535.00	1,000.00	87%
108	2,590.00	2,663.00	3%	1,165.00	1,165.00	0%
109	1,234.00	2,733.00	121%	700.00	1,331.00	90%
110	608.00	2,374.00	290%	591.00	1,245.00	111%
111	1,077.00	2,651.00	146%	785.00	1,220.00	55%
112	933.00	2,956.00	217%	881.00	1,650.00	87%
113	677.00	888.00	31%	659.00	829.00	26%
114	519.00	2,651.00	411%	505.00	1,146.00	127%
115	553.00	2,374.00	329%	538.00	1,220.00	127%
116	1,086.00	1,535.00	41%	745.00	1,250.00	68%
117	1,102.00	1,399.00	27%	819.00	1,225.00	50%

EXHIBIT E – THE RITTENHOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
118	984.00	1,257.00	28%	817.00	1,134.00	39%
119	708.00	915.00	29%	676.00	841.00	24%
120	888.00	1,930.00	117%	580.00	1,109.00	91%
121	1,067.00	1,685.00	58%	995.00	1,603.00	61%
122	958.00	1,461.00	53%	683.00	1,403.00	105%
123	977.00	1,724.00	76%	793.00	1,300.00	64%
124	519.00	1,711.00	230%	505.00	1,196.00	137%
125	687.00	901.00	31%	668.00	840.00	26%
126	834.00	3,301.00	296%	796.00	1,551.00	95%
127	708.00	2,651.00	274%	676.00	1,095.00	62%
128	797.00	1,021.00	28%	775.00	952.00	23%
129	797.00	2,733.00	243%	775.00	1,375.00	77%
130	1,102.00	3,051.00	177%	895.00	1,475.00	65%
131	895.00	1,149.00	28%	852.00	1,121.00	32%
132	515.00	673.00	31%	515.00	657.00	28%
133	1,070.00	1,360.00	27%	844.00	1,230.00	46%
134	441.00	2,960.00	571%	429.00	1,270.00	196%
135	1,338.00	3,302.00	147%	955.00	1,550.00	62%
136	1,338.00	2,583.00	93%	895.00	1,576.00	76%
137	519.00	698.00	34%	505.00	653.00	29%
138	637.00	840.00	32%	620.00	784.00	26%
139	888.00	1,711.00	93%	791.00	1,195.00	51%
140	537.00	710.00	32%	522.00	664.00	27%
141	677.00	2,745.00	305%	659.00	1,661.00	152%
142	687.00	2,648.00	285%	668.00	1,625.00	143%
143	1,077.00	2,651.00	146%	775.00	1,202.00	55%
144	961.00	1,153.00	20%	736.00	1,080.00	47%
145	708.00	1,450.00	105%	689.00	1,153.00	67%
146	1,102.00	1,399.00	27%	825.00	1,189.00	44%
147	895.00	1,149.00	28%	838.00	1,046.00	25%
148	565.00	668.00	18%	550.00	633.00	15%
149	888.00	1,142.00	29%	741.00	1,095.00	48%
150	722.00	1,487.00	106%	702.00	1,345.00	92%
151	959.00	1,217.00	27%	914.00	1,187.00	30%
152	553.00	2,143.00	288%	538.00	1,253.00	133%
153	519.00	2,374.00	357%	505.00	1,220.00	142%
154	1,176.00	1,487.00	26%	1,025.00	1,415.00	38%
155	677.00	1,822.00	169%	659.00	1,250.00	90%
156	797.00	1,304.00	64%	713.00	1,139.00	60%

EXHIBIT E – THE RITTENHOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
157	1,234.00	2,733.00	121%	895.00	1,500.00	68%
158	1,234.00	3,051.00	147%	895.00	1,475.00	65%
159	637.00	3,051.00	379%	620.00	1,375.00	122%
160	1,102.00	2,448.00	122%	845.00	1,525.00	80%
161	888.00	1,711.00	93%	745.00	1,250.00	68%
162	637.00	831.00	30%	620.00	775.00	25%
163	888.00	1,535.00	73%	715.00	1,150.00	61%
164	832.00	1,063.00	28%	809.00	1,033.00	28%
165	794.00	1,018.00	28%	772.00	949.00	23%
166	794.00	2,374.00	199%	745.00	1,096.00	47%
167	687.00	3,051.00	344%	668.00	1,475.00	121%
168	1,086.00	1,304.00	20%	799.00	1,095.00	37%
169	605.00	2,960.00	389%	589.00	1,195.00	103%
170	1,013.00	2,956.00	192%	873.00	1,700.00	95%
171	1,338.00	3,301.00	147%	925.00	1,675.00	81%
172	519.00	688.00	33%	505.00	643.00	27%
173	519.00	698.00	34%	505.00	682.00	35%
174	859.00	1,031.00	20%	530.00	726.00	37%
175	1,234.00	1,559.00	26%	895.00	1,280.00	43%
176	637.00	3,051.00	379%	620.00	1,475.00	138%
177	859.00	1,107.00	29%	735.00	1,054.00	43%
178	859.00	2,960.00	245%	715.00	1,195.00	67%
179	722.00	943.00	31%	702.00	879.00	25%
180	833.00	1,065.00	28%	810.00	1,039.00	28%
181	872.00	1,048.00	20%	625.00	950.00	52%
182	669.00	869.00	30%	651.00	848.00	30%
183	933.00	1,196.00	28%	897.00	1,114.00	24%
184	1,499.00	2,648.00	77%	1,025.00	1,575.00	54%
185	1,077.00	2,960.00	175%	795.00	1,195.00	50%
186	652.00	848.00	30%	634.00	813.00	28%
187	637.00	3,051.00	379%	620.00	1,375.00	122%
188	637.00	1,764.00	177%	620.00	1,350.00	118%
189	637.00	840.00	32%	613.00	784.00	28%
190	859.00	1,535.00	79%	715.00	1,133.00	58%
191	984.00	2,733.00	178%	840.00	1,500.00	79%
192	528.00	633.00	20%	514.00	616.00	20%
193	1,013.00	3,302.00	226%	898.00	1,800.00	100%
194	1,135.00	3,301.00	191%	855.00	1,550.00	81%
195	859.00	2,651.00	209%	735.00	1,195.00	63%

EXHIBIT E – THE RITTENHOUSE RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
196	895.00	1,149.00	28%	838.00	1,121.00	34%
197	519.00	2,651.00	411%	505.00	1,220.00	142%
198	553.00	2,973.00	438%	538.00	708.00	32%
199	835.00	1,067.00	28%	812.00	1,041.00	28%
200	677.00	2,956.00	337%	659.00	1,675.00	154%
201	1,086.00	1,535.00	41%	745.00	1,135.00	52%
202	859.00	2,128.00	148%	735.00	1,180.00	61%
203	961.00	2,651.00	176%	742.00	1,195.00	61%
204	637.00	3,051.00	379%	620.00	1,325.00	114%
205	767.00	972.00	27%	677.00	825.00	22%
206	767.00	972.00	27%	677.00	769.00	14%

**EXHIBIT F –PARKVIEW APARTMENTS RENT CEILINGS AND
RENT CHARGED**

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
1	698.00	824.00	18%	698.00	824.00	18%
2	917.00	1,662.00	81%	785.00	975.00	24%
3	1,016.00	1,690.00	66%	775.00	1,050.00	35%
4	669.00	1,319.00	97%	650.00	860.00	32%
5	1,123.00	1,483.00	32%	740.00	1,020.00	38%
6	1,123.00	1,861.00	66%	785.00	1,025.00	31%
7	1,123.00	1,662.00	48%	785.00	1,025.00	31%
8	576.00	680.00	18%	576.00	680.00	18%
9	1,123.00	1,324.00	18%	785.00	990.00	26%
10	854.00	1,129.00	32%	810.00	1,025.00	27%
11	1,123.00	1,662.00	48%	810.00	1,025.00	27%
12	679.00	801.00	18%	679.00	801.00	18%
13	1,072.00	1,264.00	18%	785.00	1,010.00	29%
14	1,000.00	1,536.00	54%	696.00	900.00	29%
15	558.00	1,253.00	125%	558.00	935.00	68%
16	795.00	1,321.00	66%	680.00	900.00	32%
17	583.00	1,319.00	126%	583.00	865.00	48%
18	679.00	801.00	18%	676.00	801.00	18%
19	679.00	801.00	18%	676.00	801.00	18%
20	698.00	824.00	18%	698.00	824.00	18%
21	595.00	702.00	18%	595.00	702.00	18%
22	679.00	1,893.00	179%	679.00	1,075.00	58%
23	848.00	998.00	18%	694.00	857.00	23%
24	907.00	1,070.00	18%	810.00	986.00	22%
25	917.00	1,081.00	18%	600.00	756.00	26%
26	1,144.00	1,692.00	48%	810.00	1,010.00	25%
27	679.00	1,510.00	122%	676.00	975.00	44%
28	838.00	988.00	18%	721.00	867.00	20%
29	1,063.00	1,253.00	18%	695.00	900.00	29%
30	998.00	1,486.00	49%	650.00	860.00	32%
31	583.00	687.00	18%	581.00	687.00	18%
32	957.00	1,483.00	55%	807.00	1,025.00	27%
33	853.00	1,007.00	18%	800.00	974.00	22%
34	917.00	1,484.00	62%	800.00	1,025.00	28%
35	669.00	1,486.00	122%	587.00	712.00	21%
36	811.00	956.00	18%	810.00	956.00	18%
37	748.00	882.00	18%	700.00	759.00	8%
38	796.00	939.00	18%	780.00	939.00	20%
39	679.00	1,662.00	145%	665.00	975.00	47%

**EXHIBIT F – PARKVIEW APARTMENTS RENT CEILINGS AND
 RENT CHARGED (cont'd.)**

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
40	853.00	1,007.00	18%	807.00	977.00	21%
41	679.00	801.00	18%	679.00	801.00	18%
42	999.00	1,480.00	48%	650.00	825.00	27%
43	632.00	746.00	18%	632.00	746.00	18%
44	1,118.00	1,477.00	32%	710.00	900.00	27%
45	869.00	1,319.00	52%	685.00	900.00	31%
46	679.00	801.00	18%	676.00	801.00	18%
47	892.00	1,051.00	18%	694.00	900.00	30%
48	700.00	924.00	32%	700.00	897.00	28%
49	699.00	825.00	18%	684.00	825.00	21%
50	761.00	1,510.00	98%	760.00	1,025.00	35%
51	950.00	1,252.00	32%	650.00	885.00	36%

EXHIBIT G –MARBURY PLAZA RENT CEILINGS AND RENT CHARGED

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
1	553.00	633.00	14%	543.00	619.00	14%
2	2,024.00	2,320.00	15%	691.00	791.00	14%
3	3,090.00	3,546.00	15%	730.00	835.00	14%
4	2,921.00	4,970.00	70%	719.00	914.00	27%
5	539.00	614.00	14%	530.00	605.00	14%
6	2,428.00	5,230.00	115%	630.00	908.00	44%
7	700.00	801.00	14%	688.00	787.00	14%
8	888.00	1,017.00	15%	886.00	1,014.00	14%
9	2,604.00	3,346.00	28%	522.00	687.00	32%
10	915.00	1,046.00	14%	717.00	819.00	14%
11	2,574.00	5,290.00	106%	669.00	1,024.00	53%
12	2,395.00	5,045.00	111%	587.00	809.00	38%
13	2,754.00	3,162.00	15%	572.00	911.00	59%
14	838.00	959.00	14%	739.00	845.00	14%
15	3,386.00	4,363.00	29%	522.00	895.00	71%
16	2,866.00	3,292.00	15%	762.00	1,080.00	42%
17	2,573.00	2,952.00	15%	666.00	761.00	14%
18	2,551.00	2,928.00	15%	488.00	673.00	38%
19	2,866.00	5,912.00	106%	592.00	978.00	65%
20	2,212.00	2,536.00	15%	736.00	842.00	14%
21	2,271.00	5,230.00	130%	866.00	1,080.00	25%
22	553.00	633.00	14%	543.00	619.00	14%
23	692.00	792.00	14%	680.00	778.00	14%
24	693.00	875.00	26%	681.00	875.00	28%
25	595.00	680.00	14%	585.00	668.00	14%
26	3,461.00	4,888.00	41%	645.00	861.00	33%
27	2,019.00	2,315.00	15%	474.00	524.00	11%
28	2,700.00	3,100.00	15%	492.00	803.00	63%
29	3,031.00	5,045.00	66%	588.00	790.00	34%
30	2,138.00	4,341.00	103%	611.00	782.00	28%
31	643.00	736.00	14%	632.00	720.00	14%
32	3,454.00	3,964.00	15%	636.00	728.00	14%
33	625.00	5,045.00	707%	614.00	809.00	32%
34	3,626.00	5,909.00	63%	592.00	1,103.00	86%
35	947.00	5,909.00	524%	920.00	1,021.00	11%
36	2,882.00	3,306.00	15%	643.00	998.00	55%
37	1,482.00	3,759.00	154%	449.00	487.00	8%
38	3,626.00	4,159.00	15%	699.00	998.00	43%
39	3,633.00	4,172.00	15%	685.00	1,103.00	61%

EXHIBIT G – MARBURY PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
40	2,393.00	4,888.00	104%	579.00	830.00	43%
41	638.00	4,973.00	679%	521.00	914.00	75%
42	2,154.00	4,970.00	131%	739.00	966.00	31%
43	661.00	5,591.00	746%	649.00	779.00	20%
44	2,486.00	2,852.00	15%	762.00	872.00	14%
45	3,633.00	5,909.00	63%	799.00	1,022.00	28%
46	2,917.00	3,346.00	15%	499.00	564.00	13%
47	700.00	801.00	14%	688.00	787.00	14%
48	2,286.00	2,621.00	15%	736.00	842.00	14%
49	3,633.00	4,168.00	15%	789.00	903.00	14%
50	3,026.00	4,352.00	44%	532.00	772.00	45%
51	1,000.00	1,145.00	15%	974.00	1,115.00	14%
52	2,609.00	4,970.00	90%	592.00	861.00	45%
53	3,793.00	4,352.00	15%	556.00	615.00	11%
54	2,024.00	2,320.00	15%	671.00	759.00	13%
55	3,793.00	5,045.00	33%	522.00	826.00	58%
56	1,900.00	2,179.00	15%	497.00	568.00	14%
57	2,938.00	4,341.00	48%	492.00	736.00	50%
58	2,344.00	2,689.00	15%	661.00	756.00	14%
59	596.00	681.00	14%	585.00	668.00	14%
60	693.00	3,284.00	374%	615.00	703.00	14%
61	2,736.00	4,973.00	82%	727.00	966.00	33%
62	3,028.00	4,341.00	43%	542.00	764.00	41%
63	2,559.00	2,936.00	15%	843.00	964.00	14%
64	2,085.00	2,391.00	15%	792.00	907.00	15%
65	3,238.00	3,715.00	15%	677.00	774.00	14%
66	2,604.00	2,987.00	15%	515.00	589.00	14%
67	2,978.00	3,415.00	15%	1,170.00	1,341.00	15%
68	3,633.00	5,290.00	46%	799.00	885.00	11%
69	3,793.00	4,352.00	15%	537.00	739.00	38%
70	3,454.00	3,964.00	15%	599.00	685.00	14%
71	638.00	4,402.00	590%	627.00	861.00	37%
72	625.00	5,591.00	795%	614.00	701.00	14%
73	2,485.00	2,851.00	15%	777.00	888.00	14%
74	2,862.00	5,230.00	83%	799.00	928.00	16%
75	2,924.00	3,354.00	15%	488.00	537.00	10%
76	1,976.00	2,266.00	15%	839.00	924.00	10%
77	2,614.00	6,103.00	133%	627.00	1,024.00	63%
78	3,626.00	4,159.00	15%	627.00	694.00	11%

EXHIBIT G – MARBURY PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
79	2,703.00	4,352.00	61%	579.00	655.00	13%
80	3,454.00	3,964.00	15%	639.00	732.00	15%
81	3,083.00	4,970.00	61%	592.00	655.00	11%
82	583.00	666.00	14%	573.00	655.00	14%
83	3,793.00	4,352.00	15%	492.00	562.00	14%
84	1,091.00	5,045.00	362%	729.00	963.00	32%
85	2,077.00	2,382.00	15%	392.00	447.00	14%
86	1,809.00	4,531.00	150%	616.00	756.00	23%
87	1,809.00	2,073.00	15%	772.00	883.00	14%
88	604.00	4,363.00	622%	593.00	809.00	36%
89	3,875.00	4,970.00	28%	686.00	877.00	28%
90	3,883.00	4,455.00	15%	739.00	845.00	14%
91	3,024.00	3,469.00	15%	664.00	759.00	14%
92	3,626.00	5,787.00	60%	799.00	1,051.00	32%
93	2,072.00	2,377.00	15%	803.00	889.00	11%
94	907.00	5,287.00	483%	632.00	1,033.00	63%
95	2,917.00	3,346.00	15%	472.00	522.00	11%
96	2,892.00	3,316.00	15%	765.00	875.00	14%
97	2,271.00	4,669.00	106%	929.00	1,052.00	13%
98	2,699.00	4,363.00	62%	675.00	803.00	19%
99	1,007.00	1,152.00	14%	669.00	741.00	11%
100	2,110.00	4,973.00	136%	499.21	855.00	71%
101	560.00	640.00	14%	550.00	630.00	15%
102	2,271.00	2,604.00	15%	692.00	792.00	14%
103	3,626.00	4,970.00	37%	799.00	906.00	13%
104	2,261.00	4,614.00	104%	429.00	672.00	57%
105	3,626.00	4,159.00	15%	692.00	792.00	14%
106	780.00	894.00	15%	766.00	877.00	14%
107	2,486.00	4,672.00	88%	597.00	1,005.00	68%
108	3,793.00	4,352.00	15%	595.00	680.00	14%
109	3,008.00	3,453.00	15%	694.00	873.00	26%
110	3,453.00	3,963.00	15%	629.00	884.00	41%
111	2,341.00	5,045.00	116%	657.00	861.00	31%
112	560.00	640.00	14%	550.00	630.00	15%
113	553.00	5,045.00	812%	543.00	809.00	49%
114	2,924.00	3,759.00	29%	452.00	696.00	54%
115	553.00	633.00	14%	543.00	619.00	14%
116	2,703.00	3,202.00	18%	629.00	717.00	14%
117	2,394.00	2,837.00	19%	606.00	694.00	15%

EXHIBIT G – MARBURY PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
118	2,997.00	4,505.00	50%	714.00	954.00	34%
119	2,868.00	3,399.00	19%	592.00	677.00	14%
120	3,087.00	5,591.00	81%	599.00	805.00	34%
121	881.00	1,042.00	18%	881.00	1,008.00	14%
122	1,976.00	6,103.00	209%	759.00	886.00	17%
123	3,238.00	4,823.00	49%	749.00	856.00	14%
124	2,604.00	3,085.00	18%	430.00	491.00	14%
125	3,626.00	4,298.00	19%	712.00	814.00	14%
126	3,209.00	5,402.00	68%	627.00	998.00	59%
127	3,386.00	5,591.00	65%	603.00	771.00	28%
128	2,712.00	5,045.00	86%	716.00	954.00	33%
129	3,450.00	4,090.00	19%	685.00	784.00	14%
130	701.00	5,591.00	698%	701.00	802.00	14%
131	4,069.00	4,823.00	19%	799.00	885.00	11%
132	2,504.00	2,967.00	18%	799.00	906.00	13%
133	499.00	590.00	18%	490.00	559.00	14%
134	2,614.00	3,097.00	18%	592.00	677.00	14%
135	2,560.00	6,103.00	138%	770.00	887.00	15%
136	2,271.00	2,691.00	18%	777.00	888.00	14%
137	3,793.00	4,495.00	19%	599.00	826.00	38%
138	687.00	4,973.00	624%	675.00	992.00	47%
139	860.00	3,967.00	361%	439.52	795.00	81%
140	2,940.00	4,451.00	51%	569.00	846.00	49%
141	1,696.00	5,045.00	197%	710.00	756.00	6%
142	3,290.00	4,484.00	36%	556.00	742.00	33%
143	2,924.00	3,759.00	29%	531.00	651.00	23%
144	2,138.00	2,451.00	15%	599.00	685.00	14%
145	2,138.00	2,451.00	15%	684.00	783.00	14%
146	3,793.00	5,045.00	33%	637.00	809.00	27%
147	2,383.00	4,446.00	87%	699.00	800.00	14%
148	3,004.00	4,970.00	65%	719.00	824.00	15%
149	652.00	746.00	14%	652.00	746.00	14%
150	3,626.00	5,290.00	46%	792.00	1,051.00	33%
151	773.00	3,646.00	372%	759.00	882.00	16%
152	1,018.00	5,909.00	480%	895.00	994.00	11%
153	2,324.00	4,973.00	114%	472.00	651.00	38%
154	3,239.00	5,290.00	63%	455.26	887.00	95%
155	896.00	5,279.00	489%	675.00	1,051.00	56%
156	2,623.00	3,012.00	15%	444.96	841.00	89%

EXHIBIT G – MARBURY PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
157	2,175.00	4,973.00	129%	895.00	918.00	3%
158	3,875.00	4,449.00	15%	699.00	911.00	30%
159	2,395.00	2,747.00	15%	606.00	694.00	15%
160	2,882.00	4,669.00	62%	789.00	928.00	18%
161	3,593.00	5,909.00	64%	689.00	1,019.00	48%
162	2,019.00	4,970.00	146%	586.00	669.00	14%
163	700.00	801.00	14%	688.00	787.00	14%
164	2,866.00	3,683.00	29%	736.00	842.00	14%
165	3,238.00	3,715.00	15%	734.00	840.00	14%
166	3,023.00	3,468.00	15%	617.00	705.00	14%
167	659.00	4,402.00	568%	647.00	882.00	36%
168	701.00	802.00	14%	689.00	788.00	14%
169	2,631.00	4,360.00	66%	619.00	771.00	25%
170	647.00	740.00	14%	615.00	703.00	14%
171	3,088.00	3,546.00	15%	659.00	830.00	26%
172	2,611.00	2,994.00	15%	465.00	532.00	14%
173	3,387.00	4,941.00	46%	606.00	756.00	25%
174	2,026.00	4,341.00	114%	567.00	728.00	28%
175	3,793.00	4,355.00	15%	518.00	777.00	50%
176	2,290.00	2,627.00	15%	614.00	702.00	14%
177	700.00	801.00	14%	688.00	787.00	14%
178	2,411.00	5,309.00	120%	678.00	861.00	27%
179	2,614.00	5,909.00	126%	799.00	1,051.00	32%
180	2,614.00	5,909.00	126%	627.00	877.00	40%
181	853.00	978.00	15%	838.00	959.00	14%
182	2,261.00	4,614.00	104%	479.00	668.00	39%
183	3,238.00	5,287.00	63%	712.00	1,033.00	45%
184	3,238.00	5,787.00	79%	792.00	1,051.00	33%
185	638.00	731.00	15%	627.00	715.00	14%
186	765.00	4,731.00	518%	765.00	856.00	12%
187	3,454.00	3,967.00	15%	830.00	899.00	8%
188	1,234.00	4,888.00	296%	606.00	777.00	28%
189	2,892.00	3,316.00	15%	774.00	885.00	14%
190	3,633.00	4,168.00	15%	699.00	800.00	14%
191	2,611.00	2,997.00	15%	487.00	651.00	34%
192	2,866.00	3,289.00	15%	592.00	677.00	14%
193	832.00	952.00	14%	832.00	952.00	14%
194	809.00	926.00	14%	795.00	910.00	14%
195	3,793.00	4,355.00	15%	548.00	777.00	42%

EXHIBIT G – MARBURY PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
196	2,738.00	4,446.00	62%	646.00	792.00	23%
197	1,924.00	2,205.00	15%	714.00	816.00	14%
198	3,799.00	4,362.00	15%	565.00	777.00	38%
199	1,915.00	2,196.00	15%	682.00	780.00	14%
200	2,703.00	3,100.00	15%	617.00	705.00	14%
201	2,325.00	3,346.00	44%	493.00	657.00	33%
202	2,941.00	4,534.00	54%	579.00	756.00	31%
203	3,025.00	3,470.00	15%	608.00	752.00	24%
204	2,027.00	4,363.00	115%	606.00	777.00	28%
205	784.00	898.00	15%	698.00	799.00	14%
206	2,413.00	4,970.00	106%	791.00	906.00	15%
207	2,940.00	5,045.00	72%	542.00	824.00	52%
208	2,254.00	2,586.00	15%	775.00	886.00	14%
209	2,091.00	6,103.00	192%	736.00	924.00	26%
210	3,238.00	3,715.00	15%	832.00	952.00	14%
211	1,639.00	3,663.00	123%	525.00	651.00	24%
212	2,511.00	5,624.00	124%	814.00	1,119.00	37%
213	3,238.00	3,715.00	15%	772.00	1,033.00	34%
214	782.00	5,045.00	545%	749.00	861.00	15%
215	1,107.00	4,970.00	349%	592.00	957.00	62%
216	844.00	965.00	14%	844.00	965.00	14%
217	606.00	5,245.00	766%	595.00	772.00	30%
218	2,892.00	5,290.00	83%	796.00	1,036.00	30%
219	2,626.00	3,012.00	15%	799.00	914.00	14%
220	2,924.00	3,354.00	15%	429.00	476.00	11%
221	739.00	845.00	14%	726.00	830.00	14%
222	2,866.00	6,103.00	113%	592.00	677.00	14%
223	969.00	5,787.00	497%	682.00	1,009.00	48%
224	3,800.00	4,885.00	29%	619.00	744.00	20%
225	3,868.00	4,970.00	28%	606.00	882.00	46%
226	1,127.00	4,446.00	294%	699.00	985.00	41%
227	3,290.00	4,344.00	32%	522.00	777.00	49%
228	851.00	974.00	14%	851.00	974.00	14%
229	2,623.00	4,341.00	65%	649.00	870.00	34%
230	2,917.00	3,346.00	15%	422.00	482.00	14%
231	3,800.00	4,885.00	29%	579.00	756.00	31%
232	3,387.00	3,887.00	15%	492.00	783.00	59%
233	3,387.00	3,887.00	15%	598.00	683.00	14%
234	2,676.00	4,446.00	66%	714.00	882.00	24%

EXHIBIT G – MARBURY PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
235	3,454.00	3,964.00	15%	542.00	617.00	14%
236	3,026.00	5,045.00	67%	573.00	756.00	32%
237	942.00	5,909.00	527%	592.00	951.00	61%
238	2,495.00	3,204.00	28%	665.00	760.00	14%
239	1,005.00	1,150.00	14%	620.00	708.00	14%
240	2,129.00	3,346.00	57%	479.00	546.00	14%
241	2,013.00	4,069.00	102%	950.00	1,060.00	12%
242	2,866.00	5,787.00	102%	796.00	961.00	21%
243	2,365.00	4,888.00	107%	606.00	884.00	46%
244	2,314.00	2,654.00	15%	711.00	813.00	14%
245	3,868.00	4,970.00	28%	692.00	893.00	29%
246	1,918.00	2,199.00	15%	607.00	838.00	38%
247	2,557.00	2,934.00	15%	872.00	999.00	15%
248	809.00	926.00	14%	795.00	910.00	14%
249	579.00	662.00	14%	429.00	489.00	14%
250	1,636.00	3,683.00	125%	736.00	859.00	17%
251	2,229.00	2,497.00	12%	592.00	677.00	14%
252	3,229.00	5,909.00	83%	627.00	1,066.00	70%
253	3,792.00	4,351.00	15%	642.00	710.00	11%
254	791.00	4,341.00	449%	662.00	903.00	36%
255	2,885.00	8,225.00	185%	665.00	890.00	34%
256	959.00	4,888.00	410%	720.00	926.00	29%
257	2,276.00	4,888.00	115%	579.00	857.00	48%
258	3,733.00	4,341.00	16%	603.00	870.00	44%
259	2,604.00	3,759.00	44%	522.00	596.00	14%
260	3,792.00	4,351.00	15%	542.00	617.00	14%
261	3,793.00	4,352.00	15%	562.00	642.00	14%
262	2,702.00	3,099.00	15%	568.00	649.00	14%
263	3,454.00	4,868.00	41%	632.00	720.00	14%
264	2,314.00	2,654.00	15%	616.00	704.00	14%
265	2,138.00	2,451.00	15%	774.00	885.00	14%
266	2,428.00	2,784.00	15%	864.00	989.00	14%
267	2,334.00	2,675.00	15%	734.00	813.00	11%
268	1,017.00	1,165.00	15%	951.00	1,089.00	15%
269	1,487.00	4,614.00	210%	456.00	651.00	43%
270	3,238.00	3,715.00	15%	759.00	868.00	14%
271	922.00	1,055.00	14%	922.00	1,055.00	14%
272	2,939.00	4,344.00	48%	537.00	777.00	45%
273	719.00	821.00	14%	598.00	735.00	23%

EXHIBIT G – MARBURY PLAZA RENT CEILINGS AND RENT CHARGED (cont'd.)

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
274	2,676.00	4,973.00	86%	599.00	861.00	44%
275	2,411.00	5,045.00	109%	579.00	756.00	31%
276	809.00	4,672.00	478%	795.00	1,132.00	42%
277	3,626.00	5,909.00	63%	799.00	1,024.00	28%
278	2,917.00	3,349.00	15%	422.00	651.00	54%
279	2,873.00	6,103.00	112%	729.00	877.00	20%
280	2,616.00	6,103.00	133%	739.00	882.00	19%
281	2,504.00	5,461.00	118%	719.00	821.00	14%
282	3,792.00	4,494.00	19%	556.00	615.00	11%
283	700.00	4,973.00	610%	688.00	873.00	27%
284	2,892.00	4,547.00	57%	683.00	792.00	16%
285	3,387.00	5,045.00	49%	606.00	756.00	25%
286	3,793.00	4,355.00	15%	579.00	788.00	36%
287	3,394.00	5,045.00	49%	570.00	783.00	37%
288	2,611.00	3,663.00	40%	488.00	680.00	39%
289	2,703.00	5,309.00	96%	579.00	754.00	30%
290	2,703.00	4,885.00	81%	522.00	803.00	54%
291	3,792.00	4,494.00	19%	522.00	596.00	14%
292	3,867.00	5,136.00	33%	699.00	854.00	22%
293	2,676.00	4,547.00	70%	719.00	814.00	13%
294	2,938.00	3,481.00	18%	592.00	677.00	14%
295	853.00	1,008.00	18%	838.00	959.00	14%
296	2,496.00	6,103.00	145%	622.00	1,031.00	66%
297	844.00	997.00	18%	829.00	949.00	14%
298	2,604.00	3,663.00	41%	467.00	651.00	39%
299	3,626.00	4,162.00	15%	799.00	1,051.00	32%
300	1,798.00	5,912.00	229%	939.00	1,065.00	13%
301	2,344.00	2,777.00	18%	693.00	793.00	14%
302	3,083.00	3,653.00	18%	728.00	805.00	11%
303	3,868.00	4,970.00	28%	599.00	966.00	61%
304	3,792.00	4,494.00	19%	579.00	662.00	14%
305	2,147.00	2,464.00	15%	657.00	1,132.00	72%
306	2,030.00	5,787.00	185%	748.00	1,103.00	47%
307	2,261.00	2,594.00	15%	429.00	489.00	14%
308	2,873.00	3,297.00	15%	692.00	792.00	14%
309	1,974.00	2,264.00	15%	592.00	677.00	14%
310	2,486.00	5,787.00	133%	762.00	872.00	14%
311	3,087.00	3,541.00	15%	606.00	756.00	25%
312	2,314.00	2,654.00	15%	615.00	703.00	14%

**EXHIBIT G – MARBURY PLAZA RENT CEILINGS AND RENT
CHARGED (cont'd.)**

Unit Number	1999 Rent Ceiling	2005 Rent Ceiling	Percent Change	1999 Rent Charged	2005 Rent Charged	Percent Change
313	3,867.00	4,441.00	15%	650.00	740.00	14%
314	2,029.00	4,531.00	123%	679.00	788.00	16%
315	2,411.00	5,045.00	109%	670.00	809.00	21%
316	605.00	4,455.00	636%	594.00	777.00	31%

EXHIBIT H –DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS COMMENTS

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Consumer and Regulatory Affairs

Office of the Director

December 12, 2005



Charles J. Willoughby
Inspector General
Office of the Inspector General
717 14th Street, NW
Washington, DC 20005

Dear Mr. Willoughby:

On Friday, December 11, 2005 I met with Office of the Inspector General staff to discuss your recently issued *Review of Landlord Filings at the Rental Accommodations and Conversion Division of the Department of Consumer and Regulatory Affairs*. As a result of our meeting, we are providing this exit response.

I truly appreciate the hard work of your staff in compiling data and quickly producing this very useful document. The data contained in the document are accurate and the report structure provides a good foundation for conducting further analyses of landlord filings throughout the District of Columbia. In fact, we plan to use many of the templates designed by your office for routine data compilation.

Although the document does not provide findings, conclusions, or recommendations, we believe that key trends can be gleaned from the materials. Additionally, we will use the information to guide DCRA in making appropriate internal administrative enhancements to our Rental Accommodations and Conversions work. More specifically, we intend to simplify our data collection procedures by designing and implementing electronic submission systems in the very near future. We believe that these types of improvements will reduce the amount of paperwork required, while expanding the capacity of DCRA staff to quickly and thoroughly review data in easily accessible formats.

In addition to updating technology in the Rental Accommodation and Conversion Division, we will carefully review staffing and skill levels. We anticipate hiring a new Rent Administrator and counsel in place by spring 2006. Also, we will continue working with your office to identify best practices and standard operating procedures.

Thank you for your ongoing work with DCRA to improve the quality of services that we provide to District of Columbia residents.

Sincerely,

Patrick J. Canavan, Psy.D.
Director

941 North Capitol Street, N.E., Suite 9500, Washington, D.C. 20002
Phone: (202) 442-8947 Fax: (202) 442-9445