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**COMPLAINT OF ANDREA OSPINA § BEFORE THE STATE OFFICE OF
AGAINST DAVIS PLAZA § ADMINISTRATIVE HEARINGS
APARTMENT HOMES §**

**COMPLAINANT ANDREA OSPINA'S
DIRECT TESTIMONY**

SUBMITTED OCTOBER 6, 2023

QUESTION 1: PLEASE STATE YOUR NAME AND MAILING ADDRESS.

My name is Andrea Ospina. I can receive mail through my attorney at 6387 Camp Bowie Blvd.
Ste. B-413, Fort Worth, TX 76116.

**QUESTION 2: DID YOU PREVIOUSLY RESIDE AT DAVIS PLAZA APARTMENT
HOMES?**

Yes. I resided there from approximately 2013 through 2020.

QUESTION 3: WHERE IS DAVIS PLAZA APARTMENT HOMES LOCATED?

Davis Plaza Apartment Homes is, or was, located at 7848 Irish Drive, North Richland Hills,
Texas 76180. I rented Unit 101, at 7840 Irish Drive.

QUESTION 4: WHO DID YOU RENT THIS APARTMENT WITH?

My husband, Omar Ospina, and I leased the apartment and resided there. Our children resided
with us there.

QUESTION 5: HOW LARGE WAS THIS APARTMENT?

It was a three-bedroom apartment.

QUESTION 6: DID YOU PAY FOR WATER SERVICE IN ADDITION TO THE RENT?

Yes.

**QUESTION 7: HOW MUCH WERE YOU CHARGED FOR WATER BILLS THROUGH
EARLY 2020?**

We were charged about \$60 per month.

QUESTION 8: DID YOUR WATER BILLS INCREASE?

Yes. They started billing us between \$200 per month and \$300 per month. For example, for the month of February to March, we were charged \$271.94. For the month of April to May, we were charged \$285.24. In another bill, we were charged \$227.14.

QUESTION 9: DO YOU KNOW HOW YOU WERE BILLED FOR WATER?

Yes, we were billed by allocation.

QUESTION 10: DID YOU LEARN HOW MUCH OTHER TENANTS AT DAVIS PLAZA WERE BEING BILLED?

Yes. Some other tenants were still being billed approximately \$60-\$80 per month, and the townhomes in the same complex were being billed approximately \$60 per month directly by the city.

QUESTION 11: DID YOU REQUEST WATER BILLING RECORDS FROM DAVIS PLAZA STAFF?

Yes.

QUESTION 12: WHAT WAS THE RESPONSE?

“It is what it is.”

QUESTION 13: WERE YOU GIVEN A NOTICE TO VACATE?

Yes. Davis Plaza applied our rent money to cover the arbitrary water and other charges and then claimed we got behind in rent, so they gave us a 3-day notice to vacate.

QUESTION 14: DID DAVIS PLAZA CHANGE THE LOCKS ON YOUR APARTMENT OUTSIDE OF THE LEGAL EVICTION PROCESS?

Yes.

QUESTION 15: DID YOU LEARN THAT DAVIS PLAZA HAD NOT APPLIED FOR A PERMIT TO ALLOCATE WATER CHARGES?

Yes.

QUESTION 16: DOES THIS CONCLUDE YOUR TESTIMONY?

Yes, I reserve the right to supplement my testimony.