

UNITED STATES OF AMERICA
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF ADMINISTRATIVE LAW JUDGES

The Secretary, United States)
Department of Housing and Urban)
Development, on behalf of)
[REDACTED] their minor)
children,)
)
Charging Party,)
)
v.)
)
Sharlene Kuiper, Jerald Kuiper and the Kuiper)
Family Trust, Sharlene Kuiper and Jerald Kuiper,)
trustees,)
)
Respondents.)

HUDALJ No.:
FHEO Nos.: 05-10-0605-8
05-10-0606-8

CHARGE OF DISCRIMINATION

I. JURISDICTION

On February 10, 2010, Complainants [REDACTED] filed timely complaints with the United States Department of Housing and Urban Development ("HUD" or "the Department"), alleging that Respondents Sharlene Kuiper, Jerald Kuiper and the Kuiper Family Trust, Sharlene Kuiper and Jerald Kuiper, trustees, the owners and managers of the subject property, violated the Fair Housing Act as amended in 1988, 42 U.S.C. §3601 *et seq.* (the "Act"), by discriminating based on familial status, specifically, in violation of 42 U.S.C. §3604(a) and (d). On July 16, 2010, both complaints were amended to include a 42 U.S.C §3604(c) allegation. On August 16, 2010, both complaints were again amended to add Complainants' minor children, [REDACTED] as aggrieved parties and to add a 42 U.S.C. §3604(b) allegation.

The Act authorizes the issuance of a charge of discrimination on behalf of an aggrieved person following an investigation and a determination that reasonable cause exists to believe that a discriminatory housing practice has occurred. 42 U.S.C. §3610(g)(1) and (2). The Secretary has delegated to the General Counsel (54 Fed. Reg. 13121), who has retained and re-delegated to the Regional Counsel (73 Fed. Reg. 68442) the authority to issue such a charge, following a determination of reasonable cause by the Assistant Secretary for Fair Housing and Equal Opportunity or his or her designee.

The Office of Fair Housing and Equal Opportunity Region V Director, on behalf of the Assistant Secretary for Fair Housing and Equal Opportunity, has determined that reasonable cause exists to believe that a discriminatory housing practice has occurred in this case based on familial status and has authorized and directed the issuance of this Charge of Discrimination ("Charge").

II. SUMMARY OF ALLEGATIONS IN SUPPORT OF THIS CHARGE

Based on HUD's investigation of the allegations contained in the aforementioned HUD Complaint and Determination of Reasonable Cause, Respondents Sharlene Kuiper, Jerald Kuiper and the Kuiper Family Trust, Sharlene Kuiper and Jerald Kuiper, trustees, are charged with discriminating against [REDACTED] and their minor children, aggrieved persons, as defined by 42 U.S.C. §3602(i), based on familial status in violation of 42 U.S.C. §3604(a), (b), (c), and (d) of the Act as follows:

1. It is unlawful to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of familial status. 42 U.S.C. §3604(a).
2. It is unlawful to discriminate against any person in the terms, conditions, or privileges of rental of a dwelling, or in the provision of services or facilities in connection therewith, because of familial status. 42 U.S.C. §3604(b).
3. It is unlawful to make, print or publish or cause to be made, printed or published any statement or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation or discrimination based on familial status or an intention to make any such preference, limitation, or discrimination. 42 U.S.C. §3604(c).
4. It is unlawful to represent to any person because of familial status that any dwelling is not available for inspection or rental when such dwelling is, in fact, so available. 42 U.S.C. §3604(d).
5. "Familial status" is defined by the Act as one or more individuals (who have not attained the age of 18 years) being domiciled with a parent or other person having legal custody of such individual or individuals. 42 U.S.C. §3602(k).
6. At all times relevant to this Charge, Complainant [REDACTED] and [REDACTED] married and lived with their three minor children, Elijah, Ethan and Sailor.
7. At all times relevant to this Charge, Respondents Jerald ("Jerry") and Sharlene ("Sheri") Kuiper were trustees of Respondent Kuiper Family Trust and managed the rental properties owned by the Kuiper Family Trust. At all times relevant to this Charge, Respondent Kuiper Family Trust owned the properties located at 3703-05 North Terri Lane, Grand Chute, Wisconsin; W3181 Westtown Court and W3183 Westtown Court, Appleton, Wisconsin; W7095 Plank Road, Menasha, Wisconsin; and 7611 Boom Bay Heights Road, Larsen, Wisconsin.

8. At all times relevant to this complaint, Respondents Sheri and Jerry Kuiper were retired from the real estate industry, but maintained active real estate licenses. As real estate professionals, Respondents Sheri and Jerry Kuiper were and are aware that it is illegal to discriminate against families with children in the sale or rental of housing.
9. At all times relevant to this Charge, 3703 North Terri Lane, Grand Chute, Outagamie County, Wisconsin was a three bedroom rental unit in a duplex property owned and managed by Respondents ("subject property.")
10. At all times relevant to this Charge, the subject property was advertised and available for rent.
11. At all times relevant to this Charge, the Metropolitan Milwaukee Fair Housing Council ("Metro Milwaukee") was, and is, a nonprofit organization that promoted fair housing throughout Wisconsin. As part of its work to assist in enforcing federal and state housing laws which make it illegal to discriminate in housing based on race, color, sex, national origin, religion, age, disability, marital status, legal source of income, sexual orientation, and family status, Metro Milwaukee operates a fair housing testing program.
12. The subject property was rented to an elderly couple with no minor children from August 1995 through July 2009. On information and belief, the adjacent unit at 3705 North Terri Lane was consistently rented to couples with no children, with the exception of the current tenants, the [REDACTED] family. In or around July 1, 2008, [REDACTED] a married couple with one child, an eight year old daughter, rented the adjacent unit in the subject property duplex, 3705 North Terri Lane. Respondent Sheri Kuiper told [REDACTED] that she preferred a "younger couple without children" or words to that effect.
13. On or about May 29, 2009, [REDACTED] read an advertisement for the subject property on www.appleton.craigslist.org. In relevant part, the advertisement identified the subject property as a three bedroom duplex, located in "Appleton (Grand Chute)," stated "Move in July 31/August 1," and provided contact information in the form of a craigslist electronic mail ("e-mail") address and a telephone number of "(920) 470-5013."
14. On information and belief, the telephone number, (920) 470-5013, is listed to Respondents Sheri and Jerry Kuiper. [REDACTED] is the only female that regularly answers telephone calls placed to that telephone number, and Respondent Sheri Kuiper is the only female that responds to rental inquiries from prospective renters who call that telephone number.
15. On or about May 29, 2009, [REDACTED] requested and received, via e-mail, the address of the subject property. That same day, [REDACTED] called the advertised telephone number, (920) 470-5013, and spoke with a female, on

information and belief, Respondent Sheri Kuiper. He asked Respondent Sheri Kuiper if the subject property was still available. She answered affirmatively and then asked [REDACTED] who would occupy the subject property. He responded that it would be for himself, his wife and their three children. [REDACTED] attempted to schedule an appointment to view the subject property, but Respondent Sheri Kuiper did not schedule an appointment with him, stating that she did not know when they could get in to see the subject property. She took [REDACTED]'s name and cellular telephone number and told him that she would call him back.

16. On or about May 30 or 31, 2009, [REDACTED] walked past the subject property and noticed a "For Rent" sign in the front yard. The telephone number, (920) 470-5013, was written on the sign. Complainants also noted that there was another "For Rent" sign advertising the subject property on the corner of Terri Lane and Capital Drive, near the subject property. The telephone number, (920) 470-5013, was also written on that sign.
17. On June 1, 2009, [REDACTED] again called (920) 470-5013 and spoke to the same woman, on information and belief, Respondent Sheri Kuiper. Complainant gave his name and asked if the subject property was still available. Respondent Sheri Kuiper asked, "Josh with the three kids?" When Complainant said "yes," Respondent Sheri Kuiper informed him that her husband had shown the subject property to another prospective tenant the weekend before, that it was probably taken and that she would call him if it was still available.
18. On or about June 3, 2009, [REDACTED] again called (920) 470-5013 and spoke with the same woman, on information and belief, Respondent Sheri Kuiper. Complainant gave his name and was again asked, "Josh with the three kids?" [REDACTED] replied affirmatively and asked if the subject property was still available, pointing out that he had seen "For Rent" signs posted at the subject property, but that she had not called him back. Respondent Sheri Kuiper replied that it was still available, but that she lived far away and that Respondents were only taking telephone interviews. She abruptly disconnected the telephone call. [REDACTED] immediately called back and told Respondent Sheri Kuiper that he understood that they were just conducting interviews, but was interested to know when he could see the subject property. She replied, "We live far away and are just taking interviews, okay?" or words to that effect, and then she disconnected the telephone call a second time.
19. On or about June 4, 2009 at 10:00 a.m., [REDACTED] called (920) 470-5013 from her cellular telephone and inquired about the subject property. She spoke with a woman who later identified herself as "Sheri," Respondent Sheri Kuiper. Respondent Sheri Kuiper gave [REDACTED] details about the subject property and then asked her if she had a family. [REDACTED] replied that the subject property would just be for herself and her husband. Respondent Sheri Kuiper replied, "Perfect, you'll love the place." They exchanged names and

Respondent Sheri Kuiper said that she hoped to hear from [REDACTED] soon.

20. On or about June 4, 2009 at 7:00 p.m., [REDACTED] noticed that she had a "missed call" on her cellular telephone. The caller identification feature on her cellular telephone indicated that the call was from (920) 470-5013, Respondents' telephone number.
21. On or about June 5, 2009, [REDACTED] again noticed that she had a "missed call" from (920) 470-5013, Respondents' telephone number. [REDACTED] also received a voice mail message on her cellular telephone from Respondent Sheri Kuiper, inviting her to call to set up an appointment to see the subject property, and even offering to show [REDACTED] the subject property that day at noon.
22. On or about June 7, 2009, [REDACTED] called (920) 470-5013, Respondents' telephone number, and left a message on an answering machine saying she was calling to set up a time to see the unit and asking for a return call. Within one hour of leaving the message, the caller identification feature on [REDACTED] cellular telephone indicated that she had two "missed calls" from (920) 470-5013.
23. On or about June 7, 2009, at 12:00 p.m., [REDACTED] returned Respondent Sheri Kuiper's telephone calls. Complainant apologized for missing the calls and asked if she and her husband could see the subject property on Thursday, June 11 at 4:30 p.m. Respondent Sheri Kuiper said that she could show it to them that day, but asked if they could see the subject property any earlier that week and suggested Monday or Tuesday, instead. [REDACTED] said that she would have to talk to her husband and call back.
24. On or about June 7, 2009 at about 2:00 p.m., [REDACTED] called (920) 470-5013 and spoke with the same woman, on information and belief, Respondent Sheri Kuiper. He asked if the subject property was still available. She said, "yes," and he gave his name. Again, Respondent Sheri Kuiper told [REDACTED] that she and her husband lived far away and that they wanted to get "a bunch of people together" to see the subject property. [REDACTED] asked if any day that week worked and suggested Wednesday or Thursday. She replied that she would have to call him back, that there were no times set up, yet, to show the subject property, and that it was not ready to show. She added that he was on her "list of people to call."
25. On or about June 8, 2009, Complainant [REDACTED] called Respondent Sheri Kuiper and asked to see the subject property on Wednesday, June 10, 2009, at 5:00 p.m. Respondent Sheri Kuiper told her she would "make it work." Complainant asked Respondent Sheri Kuiper if she had to give the existing tenant notice. She replied that the woman who lived there kept the subject property immaculate and that Respondents could show it any time. They confirmed the appointment.

26. On or about June 8, 2009, Complainants made contact with Metro Milwaukee. In response to Complainants' complaint, Metro Milwaukee immediately assigned three testers to "test" Respondents' rental practices.
27. On or about June 9, 2009, Complainant ██████████ called Respondent Sheri Kuiper and told her that she had to cancel their appointment for June 10, 2009. Respondent Sheri Kuiper urged her to see the subject property and pressed her to reschedule. When Complainant ██████████ declined, Respondent Sheri Kuiper attempted to interview her over the telephone. When Complainant ██████████ said that it was not a good time to talk, Respondent Sheri Kuiper persisted, telling her that she wanted to conduct an interview right away, or words to that effect. Complainant ██████████ declined and ended the call.
28. On or about June 9, 2009, at 1:43 p.m., Metro Milwaukee Tester #1, posing as a woman with three children, called Respondents' telephone number, (920) 470-5013, and spoke with a woman, who later identified herself as "Sheri," Respondent Sheri Kuiper. Respondent Sheri Kuiper told Tester #1 that the subject property was still available and initially commented that she might be able to get her in to see it the next day. She then asked, "Is it for yourself, your husband, a family?" Tester #1 told her that she had a husband and three children. At one point, Respondent Sheri Kuiper remarked, "Okay. Got three kids. I'll get that later..." or words to that effect. Respondent Sheri Kuiper did not offer Tester #1 an opportunity to see the subject property on June 10, 2009 and declined every other day the tester offered. She told Tester #1 that she lived twenty-five miles away and that she was at "the mercy" of the existing tenant, or words to that effect. Respondent Sheri Kuiper told Tester #1 she would call her back.
29. On or about June 9, 2009, at 5:44 p.m., Metro Milwaukee Tester #2, posing as a married woman with no children, called Respondents' telephone number, (920) 470-5013, and spoke with a woman, who later identified herself as "Sheri," Respondent Sheri Kuiper. Respondent Sheri Kuiper told Tester #2 that the subject property was still available. Tester #2 told Respondent Sheri Kuiper that she was interested in the subject property for herself and her husband. Respondent Sheri Kuiper commented, "My husband and I have quite a few rentals. This one is immaculate, so we're looking for the right tenant to come in..." or words to that effect. She offered Tester #2 an appointment for the following day, June 10, 2009. When asked what time the tester could see the subject property, Respondent Sheri Kuiper replied, "you name it" and said that she would give a "quick call" to the existing tenant.
30. On or about the evening of June 9, 2009, Tester #2, posing as a married woman with no children, exchanged several telephone calls and voice mail messages with Respondent Sheri Kuiper. They agreed upon an appointment for 11:30 a.m. on June 10, 2009. Just before confirming their appointment, Respondent Sheri Kuiper remarked to Tester #2, "I'm doing a lot of interviews. I have so many phone calls, so I am really screening before I show it. I know I can't discriminate or anything like that, but I've had so many people call with so many kids. So, that's why I'm

looking for a family or a couple. It's very nice, immaculate inside. I've only had one lady living there" or words to that effect.

31. On or about June 10, 2009, Tester #2 called Respondent Sheri Kuiper to cancel their appointment. Respondent Sheri Kuiper left several voice mail messages, encouraging Tester #2 to see the subject property, stating in her final voice mail message, "...just let me know either way because I'm holding off other people" or words to that effect.
32. On or about June 13, 2009, Respondent Sheri Kuiper left a voice mail message for Tester #1, stating that she was going to "start showing" the subject property and offering to make an appointment with her.
33. On or about June 14, 2009, Respondent Sheri Kuiper left a voice mail message for Complainant [REDACTED], stating that the subject property was ready to show and inviting her to call if she wanted to see the subject property.
34. On June 15, 2009, Respondent Sheri Kuiper left a voice mail message for Complainant [REDACTED] stating that she was ready to show him the subject property.
35. On or about June 16, 2009, Metro Milwaukee Tester #3, posing as a married woman without children, called Respondents' telephone number, (920) 470-5013, and spoke with a woman who later identified herself as "Sheri," Respondent Sheri Kuiper. Tester #3 inquired into the availability of the subject property for rent. In response, Respondent Sheri Kuiper asked her name and "how many people?" Tester #3 replied, "two." Respondent Sheri Kuiper confirmed, "Just two people?" And Tester #3 offered, "Just my husband and myself." They discussed rent and availability and settled on an appointment for 1:30 p.m. the following day. Respondent Sheri Kuiper then told Tester #3, "I'm kinda looking for the perfect renter. A lot of people want to get in. I have been kinda picky...I don't have anything against a whole lot of kids or anything, but I had a lot of people calling me. You're planning on having children, I'm sure. I have two guys who would want it...It would be nice for a married couple. If you have children, that's fine, too" or words to that effect. Tester #3 stated that she was married and Respondent Sheri Kuiper repeated, "You're planning on having children, I'm sure," or words to that effect. Tester #3 replied that they were not planning on having children. They continued their discussion and confirmed an appointment for the next day.
36. The next day, on or about June 17, 2009, Tester #3 met with Respondents Sheri and Jerry Kuiper at the subject property. While touring the subject property, Respondent Jerry Kuiper told Tester #3, "...We have a lot of people we don't show it to." He went on to say that he does not want anyone "tromping" on his properties, or words to that effect. In discussing the security deposit, Respondent Jerry Kuiper said, "Just \$1,000 security deposit....if you had a lot of kids, we double the deposit. We go two months because they can tear up a place in no time. \$1,700 security deposit for two months," or words to that effect.

37. At the June 17, 2009 showing, Respondent Sheri Kuiper offered to rent the subject property to Tester #3. She then said to Tester #3, "I'm looking for the perfect renter, meaning I don't want a lot of kids, but there is [sic] just not kids here. Is that okay?" or words to that effect. Respondent Sheri Kuiper went on to say, "I am really pushing everybody off. I would rather have a couple. You're really the first couple that has come without. There are two guys that are interested, but I would rather have a married couple. I'm not discriminating, am I?" or words to that effect. Tester #3 took an application and left.
38. Between June 17, 2009 and June 18, 2009, Respondent Sheri Kuiper and Tester #3 exchanged a number of telephone calls and voice mail messages. In one voice mail message, Respondent Sheri Kuiper offered Tester #3 the subject property for \$825, \$25 less than was advertised. She also re-stated that the security deposit would be \$1,000.
39. In or around late May or early June 2009, Respondents showed the subject property to the [REDACTED] family, a married couple with one child. The [REDACTED] family stated that they were told that the rent for the subject property was \$850 and that the security deposit was \$1,300.
40. In or around June of 2009, [REDACTED], a married woman with three children visited the subject property with some family members who were not intending to live with her. Two weeks after she visited the subject property, she was rejected for rental, but was not offered a reason for the rejection.
41. On or about June 18, 2009, Respondents rented the subject property to [REDACTED] and [REDACTED], two single males, with no children.
42. Complainants filed a housing discrimination case, alleging facts identical to the HUD complaint, with the Wisconsin Department of Workforce Development Equal Rights Division, which issued a Charge and Initial Determination of Probable Cause on March 9, 2010 based on its investigation of the facts. Complainants withdrew their complaint with the Wisconsin Department of Workforce Development Equal Rights Division to pursue their HUD complaint.
43. By denying, or unreasonably delaying [REDACTED] the opportunity to view the subject property after he disclosed that he has three children, Respondents refused to negotiate for the rental of, or otherwise made unavailable or denied, a dwelling to Complainants on the basis of familial status in violation of 42 U.S.C. §3604(a).
44. By offering prospective renters with no children the opportunity to view and rent the subject property before offering Complainant [REDACTED], a married man with three children, the opportunity to view and potentially rent the subject property, and by offering to show Complainant [REDACTED] the subject property only after exhausting all opportunities to rent the subject property to married couples with no children,

Respondents subjected Complainants to inferior terms and conditions of rental on the basis of familial status in violation of 42 U.S.C. §3604(b).

45. By stating to Tester #2, posing as a prospective renter with no children, "I'm doing a lot of interviews. I have so many phone calls, so I am really screening before I show it. I know I can't discriminate or anything like that, but I've had so many people call with so many kids. So, that's why I'm looking for a family or a couple. It's very nice, immaculate inside. I've only had one lady living there" or words to that effect, Respondent Sheri Kuiper made statements indicating a preference, limitation or discrimination or an intention to make such a preference, limitation or discrimination on the basis of familial status in violation of 42 U.S.C. §3604(c).
46. By stating to Tester #3, posing as a prospective renter with no children, "I'm kinda looking for the perfect renter. A lot of people want to get in. I have been kinda picky...I don't have anything against a whole lot of kids or anything, but I had a lot of people calling me. You're planning on having children, I'm sure. I have two guys who would want it...It would be nice for a married couple. If you have children, that's fine, too." and "I'm looking for the perfect renter, meaning I don't want a lot of kids, but there is just not kids here [sic]. Is that okay?" and "I am really pushing everybody off. I would rather have a couple. You're really the first couple that has come without. There are two guys that are interested, but I would rather have a married couple. I'm not discriminating, am I?" or words to that effect, Respondent Sheri Kuiper made statements indicating a preference, limitation or discrimination or an intention to make such a preference, limitation or discrimination on the basis of familial status in violation of 42 U.S.C. §3604(c).
47. By asking Complainant [REDACTED] if she had a family, and responding, "Perfect, you'll love the place," or words to that effect, when Complainant [REDACTED] told her that the subject property would only be for herself and her husband, Respondent Sheri Kuiper made statements indicating a preference, limitation or discrimination or an intention to make such a preference, limitation or discrimination on the basis of familial status in violation of 42 U.S.C. §3604(c).
48. By repeatedly referring to Complainant [REDACTED] as, "Josh with the three kids," while repeatedly denying him the opportunity to view the subject property, a reasonable listener would understand Respondent Sheri Kuiper's reference to "Josh with the three kids" to indicate a preference, limitation or discrimination or an intention to make such a preference, limitation or discrimination on the basis of familial status in violation of 42 U.S.C. §3604(c).
49. By stating to Tester #3, posing as a prospective renter with no children, "...We have a lot of people we don't show it [the subject property] to;" and, that he does not want anyone "tromping" on his properties; and, "...if you had a lot of kids, we double the deposit. We go two months because they can tear up a place in no time. \$1,700 security deposit for two months" or words to that effect, Respondent Jerry Kuiper made statements indicating a preference, limitation or discrimination or an intention

to make such a preference, limitation or discrimination on the basis of familial status in violation of 42 U.S.C. §3604(c).

50. By telling Complainant [REDACTED] that the subject property wasn't available for showing, that Respondents were only taking telephone interviews, that arrangements had to be made with the current tenant, that Respondents lived very far away, that Respondents wanted to get a "bunch of people together" to show the subject property, and that he was on their "list" of people to call, while telling Complainant [REDACTED] and a tester, who both indicated that they did not have children, that the subject property was available for showing, and offering them and prospective renters without children appointments to see the subject property, Respondents represented to Complainant [REDACTED] that the subject property was not available for inspection when it was, in fact, so available, on the basis of familial status in violation of 42 U.S.C. §3604(d).
51. Complainants and their minor children are aggrieved persons as defined in 42 U.S.C. §3602(i), and have suffered damages, including, but not limited to, economic loss, emotional distress, substantial inconvenience and the loss of a housing opportunity as a result of Respondents' discriminatory conduct.
52. As a result of the aforementioned discrimination, Complainants were so upset that they gave up searching for a new rental unit and could not bring themselves to look for another place to live for nearly a year. It was not until July 2010 that Complainants finally signed a lease for a new unit and moved.
53. Complainants lived in a two story duplex and wanted to move to a ranch-style duplex like the subject property. The subject property was ideal for Complainants and their children as it was a ranch-style duplex. Complainants wanted a ranch-style duplex because they have three small children and a unit with stairs is more difficult and worrisome with three small children. As a result of Respondents' discrimination, they stayed in their two story duplex for over a year longer than they would have otherwise done.
54. Complainants stated that after they realized Respondents were discriminating against them because of their children, it upset them, as they felt that their children were being treated like "animals."

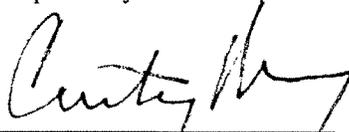
III. CONCLUSION

WHEREFORE, the Secretary of the U.S. Department of Housing and Urban Development, through the Office of the General Counsel, and pursuant to Section 3610(g)(2)(A) of the Act, hereby charges Respondents Sharlene and Jerald Kuiper, individually and as trustees of the Kuiper Family Trust with engaging in discriminatory housing practices in violation of 42 U.S.C. §3604(a), (b), (c) and (d) of the Act, and prays that an order be issued that:

1. Declares that the discriminatory housing practices of Respondents as set forth above violate the Fair Housing Act, as amended, 42 U.S.C. §§ 3601 *et seq.*;
2. Enjoins Respondents, their agents, employees, and successors, and all other persons in active concert or participation with any of them from discriminating because of familial status against any person in any aspect of the rental of a dwelling;
3. Awards such monetary damages as will fully compensate and Complainants ~~_____~~ and their children, aggrieved persons, for any and all damages caused by Respondents' discriminatory conduct; and
4. Awards a \$16,000 civil penalty against each Respondent for each violation of the Act committed, pursuant to 42 U.S.C. § 3612(g)(3).

The Secretary of HUD further prays for additional relief as may be appropriate under 42 U.S.C. § 3612(g)(3).

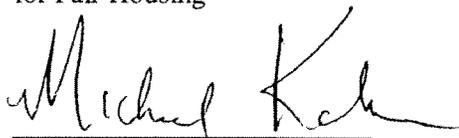
Respectfully submitted,



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Date: 9/30/10