A Civil Rights Journal

Fair Housing – Fair Lending

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New York Fair Housing Group States Discrimination Claims in Challenge to Apartment Complex's English Language Requirement

[¶ 7.1] A New York State fair housing organization that alleged that an apartment complex's policy requiring applicants for housing to speak English was discriminatory stated claims under the Fair Housing Act and state law, a federal district judge ruled in July.

CNY Fair Housing (CNY) sued the owners and operators of the Swiss Village Apartments in DeWitt, New York, after a rental agent told a caseworker for a Spanish-speaking applicant that tenants needed to have someone who spoke English living in their unit. Testers for CNY were also told that to rent a Swiss Village apartment an applicant must have someone who speaks English on the lease.

CNY sued Swiss Village, alleging that its language policy had a disparate impact on prospective tenants on the basis of national origin and race in violation of the Fair Housing Act and the New York State Human Rights Law. Swiss Village moved to dismiss the claims. Swiss Village argued that a person's language or a person's limited English proficiency is not a protected class under the Fair Housing Act or the Human Rights Law. Swiss Village also argued that the claims should be dismissed because the complaint did not identify the prospective tenants' race or national origins.

District Court Judge Mae D'Agostino denied Swiss Village's motion. In ruling that CNY had stated a claim,

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Judge D'Agostino relied in great part on a HUD guidance in which HUD concluded that limited English proficiency is often used as a proxy for national origin discrimination and that the Fair Housing Act "may therefore be violated by '[s]elective application of a language-related policy or use of [limited English proficiency] as a pretext for unequal treatment of individuals based on race, national origin, or other protected characteristics.'" Judge D'Agostino ruled that the HUD guidance was entitled to deference. She also found that CNY did "not need to identify the specific national origin or race of particular tenants in order to state a prima facie case of discrimination under the [Fair Housing Act]." [*CNY Fair Housing, Inc. v. Swiss Village, LLC*, No. 5:21-CV-1217, 2022 U.S. Dist. LEXIS 120385 (N.D.N.Y. July 8, 2022)]

Counsel: Conor Kirchner, CNY Fair Housing Inc., Syracuse, NY (CNY Fair Housing); Edward Melvin, Barclay Damon LLP, Syracuse, NY (Swiss Village, LLC)

Court Enters Judgment for Defendants in Disability Case

[¶ 7.2] A federal district judge has entered summary judgment for the owners and managers of a California apartment complex in a disability discrimination lawsuit.

Neway Mengistu, who has a disability and uses a wheelchair, applied to rent an apartment at the Forestview Apartments in Los Angeles using a Section 8 voucher. Albert Navi, the complex manager, agreed to rent Mengistu the apartment and sent him a rental agreement for his signature. However, when Mengistu toured the apartment he discovered that there were accessibility issues in the bathroom.

The Los Angeles Housing Authority, which had issued Mengistu a housing voucher, told him to address the accessibility issues with Forestview and Mengistu provided Navi with a list of the modifications he said were necessary. An accessibility expert retained by Forestview estimated that the cost of the modifications would be $30,840. When the housing authority indicated that it would not pay for the modifications, Navi canceled the rental agreement and the housing authority canceled its approval of Mengistu's tenancy. A month later, an attorney for Forestview and Navi informed Mengistu by letter that if he rented the apartment, he would be obligated to pay for the modifications he requested and to remove them when he moved out. Forestview and Navi also offered to rent him a different apartment, but Mengistu never responded to the offer.

Exactly two years after Mengistu received the letter from the attorney and two years and a month after the rental agreement was canceled, Mengistu sued Forestview and Navi, alleging disability discrimination in violation of the Fair Housing Act and California law. Mengistu alleged that the defendants had failed to make

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reasonable accommodations for his disabilities by not making the modifications to the apartment.

District Court Judge Otis T. Wright II entered summary judgment for the defendants. He ruled that Mengistu's claims were barred by the two-year statute of limitations because the cause of action accrued when the defendants canceled the rental agreement, not when their attorneys sent him the letter. Judge Wright also ruled that even if the case had been filed in a timely manner, he would have entered judgment for the defendants because they had "successfully demonstrat[ed] that their reasons for not renting the unit to Mengistu were not a pretext for discrimination, and Mengistu fail[ed] to submit evidence upon which a reasonable jury could find a discriminatory motive." [*Mengistu v. Forestview Apartments, LLC*, No. 2:19-cv-05118, 2022 U.S. Dist. LEXIS 107172 (C.D. Cal. June 15, 2022)]

Counsel: JoAnne Belisle, Campbell and Farahani LLP, Agoura Hills, CA (Mengistu); Melissa Daugherty, Lewis Brisbois Bisgaard and Smith, LLP, Los Angeles, CA (Forestview Apartments)

City's Approval of Mobile Home Park's Relocation Plan Does Not Discriminate against Spanish-Speaking Residents

[¶ 7.3] The City of SeaTac, Washington, did not discriminate against Spanish-speaking residents of a mobile home park when it approved the park owner's plan to close the park and relocate the park residents, a federal district judge ruled in June.

The Firs Home Owners Association sued the city on behalf of former residents of the Firs Mobile Home Park after the city approved the owner's relocation plan, the park was closed, and predominantly Spanish-speaking owners and residents of mobile homes were required to move. The association alleged that the city had intentionally discriminated against the residents because of their national origin in violation of the Fair Housing Act and the Washington Law Against Discrimination when it approved the relocation plan.

District Court Judge Robert Lasnik dismissed Fair Housing Act claims brought under 42 U.S.C. § 3604(b), ruling that the claims were time-barred because they were brought more than two years after the alleged discriminatory conduct occurred. He also found that the plaintiff had not stated claims under Section 3604(b) because it had not identified "any service the City provided in connection with the sale or rental of a dwelling," as is required for such a claim. In addition, he ruled that there was no evidence of threatening, coercive, or intimidating behavior in violation of Section 3617.

Judge Lasnik dismissed the majority of claims brought under Washington law and gave the plaintiff fourteen days to demonstrate why a single remaining claim brought under Washington law should not be dismissed.

The remaining state claim was dismissed in July. [*Firs Home Owners Association v. City of SeaTac*, No. C19-1130RSL, 2022 U.S. Dist. LEXIS 109883 (W.D. Wash. June 21, 2022)]

Counsel: Christina Henry, Seattle, WA (Firs Home Owners Association); Mark Johnsen, SeaTac, WA (City of SeaTac)

Design and Construction Claims Are Not Time-Barred

[¶ 7.4] Design and constructions claims filed by the United States against an architectural firm that designed fifteen senior housing facilities in several states were not barred by the statute of limitations, a federal district judge ruled in June.

The government sued the owners of the senior living facilities and J. Randolph Parry Architects, P.C. (Parry), the architectural firm that designed them, alleging that the defendants failed to comply with the accessibility requirements of the Fair Housing Act and the Americans with Disabilities Act. Parry moved to dismiss the claims against it, arguing that the claims were barred by the statute of limitations because federal lawsuits brought to enforce civil penalty provisions are subject to a five-year statute of limitations; and most of the facilities were designed and the construction was completed more than five years before the lawsuit was brought.

District Court Judge John Gallagher denied the motion. He found that the Justice Department was alleging a pattern or practice of discrimination, not fifteen discrete violations, each of which would be separately subject to the statute of limitations. He held that the action was not time-barred because at least one of the facilities which allegedly did not comply with the law was completed within the statute of limitations. [*United States v. J. Randolph Parry Architects, P.C.,* No. 5:20-cv-06429, 2022 U.S. Dist. LEXIS 110163 (E.D. Penn. June 22, 2022)]

Counsel: Julie Allen, Dept. of Justice, Washington, DC (United States); Anthony Capasso, O'Toole Scrivo LLC, Cedar Grove, NJ (J. Randolph Parry Architects, P.C.)

Black Applicant for Housing States Race Claims against Mobile Home Park and Condo Association

[¶ 7.5] A Black woman who alleged that a mobile home park and the condominium association for the park discriminated against her by imposing unreasonable application standards because of her race stated claims under the Fair Housing Act, a federal district judge ruled in June.

Cintia Marcolino attempted to apply to purchase a mobile home at Santos Mobile Homes in Ocala, Florida, and made a $5,000 deposit. However, the condominium association manager first told her that she would have to apply in her husband's name. When Marcolino submitted a second application signed by her husband, the manager told her she had to submit another application informing the association that her children would not be living in her home. She then asked Jose Dos Santos, one of the owners of the park, if the association

accepted Black members, and Santos told her that it did not. Marcolino tried to submit a third application, but could not "due to unreasonably arduous application standards on account of her race or color." Santos refused to return her deposit to her.

Marcolino sued park owners Sweet Home Mobile Home LLC and Santos, and the condominium association. However, she initially sued the wrong condominium association and did not correctly name the correct association within the statute of limitations. The defendants then moved to dismiss the claims against them, arguing that they were time-barred. District Court Judge William Dimitrouleas dismissed the homeowners association that had been erroneously named. However, he ruled that the remaining claims were not time-barred and that Marcolino had alleged sufficient facts to state housing discrimination claims. [*Marcolino v. Sweet Home Mobile Home LLC*, No. 20-cv-61797, 2022 U.S. Dist. LEXIS 112129 (S.D. Fla. June 24, 2022)]

Counsel; Brian Barakat, Coral Gables, FL (Marcolino); Larry Karns, Spink & Association, P.A., Cooper City, FL (Sweet Home Mobile Home LLC)

Court Denies Preliminary Injunction in Disability Case

[¶ 7.6] A federal district judge has denied a motion for preliminary injunction in a disability discrimination case involving the denial of a certificate of occupancy for a residence for six recovering substance abusers.

Oxford House wished to use the second floor of a two-unit building in North Bergen, New Jersey, for a residence for six men. However, the township denied an occupancy permit because it found that the use of the property violated North Bergen's zoning ordinances. Oxford House sued the township for disability discrimination and filed a motion for a preliminary injunction.

District Court Judge Esther Salas denied the motion. Judge Salas ruled that Oxford House had "fail[ed] to establish that the denial was motivated by a discriminatory purpose under the FHA and the ADA." She also found that Oxford House had not established a prima facie case of disparate impact. [*Oxford House, Inc. v. Township of North Bergen*, No. 21-19260, 2022 U.S. Dist. LEXIS 114927 (D.N.J. June 29, 2022)]

Counsel: Christopher D'Esposito, Nehmad Perillo Davis & Goldstein, P.S., Egg Harbor Township, NJ (Oxford House); Cheyne Scott, Chasan Lamparello Mallon & Cappuzzo, P.S., Secaucus, NJ (Township of North Bergen)

Court Awards Nominal Damages; Denies Compensatory And Punitive Damages in Disability Case

[¶ 7.7] The prevailing plaintiffs in a disability discrimination case have been awarded $1.00 in nominal damages. However, the district court did not award them compensatory or punitive damages.

Constance Swanston owned and operated a sober living facility known as Women's Elevated Sober Living (WESL) in Plano, Texas, in an area in which no more than eight unrelated

persons with disabilities could live in a single family house. Swanston, WESL, and a resident sued Plano under the Fair Housing Act and the Americans with Disabilities Act after Plano refused to allow the home to operate with fifteen residents as a reasonable accommodation for the residents' disabilities. Following a bench trial, District Judge Amos Mazzant entered judgment for the plaintiffs on liability and entered an injunction prohibiting Plano from restricting occupancy to fewer than 15 residents, but he deferred awarding damages.

In July, Judge Mazzant ruled on Swanston and WESL's request for damages. Swanston had argued that she was entitled to compensatory damages for mental anguish resulting from the city's treatment of her. Swanston and WESL also argued that they were entitled to $1,050,000 in lost profits because they were unable to open additional sober living homes.

Judge Mazzant denied the plaintiffs' request. He ruled that there was no factual evidence of mental anguish or lost profit damages and that, in addition, there was no legal support to justify mental anguish damages. He awarded the plaintiffs $1.00 in nominal damages for their injury. [*Swanston v. City of Plano*, No. 4:19-cv-412, 2022 U.S. Dist. LEXIS 122056 (E.D. Tex. July 12, 2022)]

Counsel: Richard Hunt, Dallas, TX (Swanston); Charles Crawford, Abernathy Roeder Boyd & Hullett, PC, McKinney, TX (City of Plano)

Tenant with Disabilities Denied Permission to Use Housing Voucher States Discrimination Claim against Landlord

[¶ 7.8] A tenant with disabilities whose landlord would no longer accept his Section 8 housing voucher stated reasonable accommodation and disparate impact claims against the landlord, a federal district judge ruled in July.

Larry Arnold was a 72-year-old veteran with several severe disabilities. He used a housing choice voucher to rent an apartment at the Valley Crest Apartments in Birmingham, Alabama. After Elmington Property Management took over the management of Valley Crest, Elmington decided that it would no longer accept Section 8 vouchers. Arnold asked Elmington to continue to permit him to use vouchers as a reasonable accommodation for his disabilities, but Elmington denied his request. Arnold then sued Elmington, alleging failure to accommodate and disparate impact in violation of the Fair Housing Act.

Elmington filed a motion to dismiss. It argued that Arnold's accommodation request was not reasonable and that he had failed to plead sufficient facts in support of his reasonable accommodation claim.

District Court Judge Abdul Kallon denied Elmington's motion. Judge Kallon ruled that Arnold had met his initial burden of showing that his request was facially reasonable and that he had presented sufficient facts in support of his disparate impact claim. [*Arnold v. Elmington Property Management LLC*, No. 2:22-cv-00254,

2022 U.S. Dist., LEXIS 126710 (N.D. Ala. July 18, 2022)]

Counsel: Charles Allenlundy, Legal Services of Alabama, Birmingham, AL (Arnold); Shannon Miller, Jackson Lewis P.S., Birmingham, AL (Elmington Property Management LLC)

Court Enters Summary Judgment for Provider of Residence for Adults with Disabilities

[¶ 7.9] A federal district court ruled in July that a Pennsylvania township intentionally discriminated on the basis of disability when it denied the application for an occupancy permit filed by an organization that wished to use a single-family house as a residence for three unrelated adults with disabilities.

Horizon House, Incorporated bought a single-family house in East Norriton Township for use as a residence for up to three persons with disabilities. The zoning code permits unrelated persons with disabilities to live together in the district as a functional family equivalent. Nevertheless, the township denied Horizon House's application for a certificate of occupancy. The township relied in its decision on a provision of the zoning ordinance that states that if unrelated persons with disabilities need special care, their residence is considered a group home and is subject to additional requirements. These requirements include having a fire sprinkler system, a fire alarm system, a minimum of four off-street parking places, and a staff person who must be present at all times. The operators of such homes are required to seek a special exception to the zoning ordinance.

Horizon House sued the township in federal court alleging disability discrimination. It also challenged the zoning board's decision in a separate lawsuit in state court. The state court found that the township zoning board had erred in finding that Horizon House's proposal was not a single-family dwelling and ruled that Horizon House was not subject to the special requirements for group homes. The township issued a certificate of use and occupancy and Horizon House then filed a motion for summary judgment in the federal case, seeking compensatory damages and attorneys' fees.

District Court Judge Harvey Bartle III entered summary judgment for Horizon House. Judge Bartle found that the ordinance upon which the township had relied was facially discriminatory and imposed "significant burdens on the owners of properties in BR-1 zoning districts who seek to use their properties to provide housing to persons with disabilities." He also noted that the ordinance's language regulating only homes for people who need "special care" was a "naked proxy for handicapped status." [*Horizon House, Inc. v. East Norriton Township*, No. 19-1252, 2022 U.S. Dist., LEXIS 131197 (E.D. Penn. July 25, 2022)]

Counsel: Guy Vilim, Media, PA (Horizon House, Inc.); Harry Mahoney, Deasey Mahoney Valentini North LTD, Philadelphia, PA (East Norriton Township)

Recent Settlements

[¶ 7.10] The following settlements have been reached.

■ The Justice Department announced in June that it had obtained a settlement of a Fair Housing Act lawsuit against Meta Platforms, Inc., which was formerly known as Facebook, Inc, alleging discriminatory advertising.

The government filed a complaint concurrently with the proposed settlement agreement in which it alleged that Meta has discriminated in violation of the Fair Housing Act in several aspects of the advertising delivery system it provides to advertisers. According to the complaint, Meta encouraged advertisers to include or exclude Facebook users who received certain ads based on protected characteristics. The Department also alleged that Meta designed and provided an algorithm for "lookalike targeting," which would enable advertisers to target audience members based on Fair Housing Act-protected characteristics and also used an algorithm to determine who would actually receive particular advertisements based on protected characteristics. The Justice Department complaint alleged both disparate impact and disparate treatment discrimination.

Under the terms of the settlement, Meta will stop using a system for advertising housing that discriminates on the basis of race, color, religion, sex, disability, familial status, or national origin. It will no longer use the "lookalike targeting" algorithm, which it now calls the "Special Ad Audience" tool. According to DOJ, Meta has until December 2022 "to develop a new system for housing ads to address disparities for race, ethnicity and sex between advertisers' targeted audiences and the group of Facebook users to whom Facebook's personalization algorithms actually deliver the ads." A third party reviewer will verify whether the new system meets compliance standards. The new system must be fully implemented by December 31, 2022. If the government concludes that the changes to Meta's delivery system do not sufficiently address discriminatory disparities, the agreement will be void and the Justice Department will resume litigation. Meta will also pay a $115,054 civil penalty. [*United States v. Meta Platforms, Inc.*, No. 1:22-cv-05187 (S.D.N.Y. June 21, 2022) (complaint and settlement filed)]

Counsel: Junis Baldon, Department of Justice, Washington, DC (United States); Natalie Naugle, Director and Associate General Counsel, Meta Platforms, Inc. San Francisco, CA (Meta Platforms, Inc.)

■ The Trident Mortgage Company will invest a minimum of $18.4 million in a loan subsidy fund that will be used to increase credit extended in minority neighborhoods of Philadelphia under the terms of a consent order resolving a lending discrimination lawsuit filed by the Consumer Financial Protection Bureau (CFPB) and the Justice Department.

In a complaint filed concurrently with the agreed upon consent order, CFPB alleged that between at least 2015 and 2019, "Trident engaged in a pattern or practice of unlawful dis-

crimination against applicants and prospective applicants, on the basis of race, color, or national origin, including by illegally redlining majority-minority neighborhoods in the Philadelphia, Camden, New Jersey, and Wilmington, Delaware metropolitan areas." Trident has also agreed, without admitting liability, to pay a $4,000,000 civil penalty. It will retain independent credit needs assessment consultants to assess the needs of majority minority areas in the Philadelphia area. [*Consumer Financial Protection Bureau v. Trident Mortgage Company LP*, No. 2:22-cv-02936 (E.D. Penn. July 27, 2022) (complaint and consent order filed)]

Counsel: Sara Niles, Dept. of Justice, Washington, DC (Consumer Financial Protection Bureau); Jonice Tucker, Paul Hastings LLP, Washington, DC (Trident Mortgage Company).

■ The City of Faribault, Minnesota, will revise its rental licensing ordinance, including a provision known as the "Crime Free Housing Program," under the terms of a settlement resolving a lawsuit alleging that provisions of the ordinance discriminated against Black renters, the majority of whom are of Somali national origin, and Latino renters. The ordinance required landlords to conduct criminal background checks on rental applicants; to use a lease with a crime free/drug free addendum; and to institute eviction proceedings against tenants who they suspected of violating these terms. In addition to updating the ordinance to enact provisions agreed upon by the parties, the city will pay the plaintiffs a total of $685,000. [*Jones v. City of Faribault*, No. 18-CV-01643, (D. MN June 14, 2022) (settlement agreement signed)]

Counsel: Alejandro Ortic, American Civil Liberties Union Foundation, New York, NY (Jones); Andrew Wolf, Iverson Reuvers Condon, Bloomington, MN (City of Faribault)

■ Advocate Law Groups of Florida, P.A., its managing partner, and several other defendants have agreed to a damage award of $4,595,000 in a case filed by the Justice Department alleging that they discriminated on the basis of national origin by targeting Latino homeowners for predatory mortgage loan modification services. Under the terms of the consent order signed by the court, $ 4.5 million of the damage award will be suspended if the defendants fulfill their other obligations under the consent decree. The remaining $95,000 will be paid to three intervening individual plaintiffs who were damaged by the defendants' practices.

The consent order prohibits the defendants from providing any mortgage relief services. They must comply with reporting and record keeping requirements for other real estate activities. They must also pay a $5,000 civil penalty. [*United States v. Advocate Law Groups of Florida, P.A.,* No. 6:18-cv-01836 (M.D. Fla. June 10, 2022) (consent order entered)]

Counsel: Andrea Steinacker, Dept. of Justice, Washington, DC (United States); A. Brian Phillips, Orlando, FL (Advocate Law Groups)

■ A Mill Valley, California, landlord has agreed to pay a total of $90,000 to settle claims that he sexually harassed a tenant. The settle-

ment resolves an administrative claim filed by Fair Housing Advocates of Northern California on behalf of the tenant against her landlords, Bret and Kimberly Andrews. The tenant, who has a disability, charged that Bret Andrews sexually harassed her during her tenancy, retaliated against her for refusing his sexual advances, and failed to accommodate her disability.

The Andrews have agreed to pay the tenant $60,000 and Fair Housing Advocates $30,000. Bret Andrews and his employees and agents will receive fair housing training and will not engage in unlawful discrimination. [*Fossella v. Andrews,* No. 202103-12856910; *Fair Housing Advocates of Northern California v. Andrews*, No. 202103-12855910 (California Department of Fair Employment and Housing) (July 5, 2022) (agreement announced)]

Counsel: Julia Howard-Gibbon, Fair Housing Advocates of Northern California, San Rafael, CA (complainants); Lance Burrow, Stratman & Williams-Abrego, Los Angeles, CA (Andrews)

■ The owners of the Bon Air apartments in Greenbrae, California, have agreed to a conciliation agreement resolving a complaint filed by Fair Housing Advocates of Northern California in which Fair Housing Advocates alleged that the owners violated California law by refusing to rent to prospective tenants who would have used housing choice vouchers. The respondents have agreed to comply with California law prohibiting discrimination on the basis of source of income and will "follow a written policy providing for equal treatment of applicants regardless of source of income or Section 8 voucher status." Respondents' employees will attend fair housing training and the respondents will pay Fair Housing Advocates $25,000 in damages. [*Fair Housing Advocates of Northern California v. Sicre, Inc.* No. 202109-14862925 (California Department of Fair Employment and Housing May 13, 2022) (conciliation agreement signed)]

Recent Filing

[¶ 7.11] The following case has been filed.

■ The Attorney General for the District of Columbia has filed a disability discrimination lawsuit against the District of Columbia Housing Authority. The District of Columbia alleges in the lawsuit that the D.C. Housing Authority has "utterly failed" in its obligation to provide reasonable accommodations to tenants with disabilities. According to the complaint, many tenants who have been approved for a transfer to an accessible unit have been waiting for more than four years for a transfer. The complaint describes the situation of a tenant with mobility issues who used a wheelchair and who lived on the fourth floor of a building without elevator access. She had not been assigned an accessible apartment for more than five years when she died in 2021. The city has asked the court to award injunctive relief, damages, and civil penalties. [*District of Columbia v. District of Columbia Housing Authority* (D.C. Superior Ct. June 16, 2022)]

Counsel: Jessica Feinberg, Office of the Attorney General for the District of Columbia, Washington, DC (District of Columbia)

HUD News

Administrative Ruling

[¶ 7.12] A HUD administrative law judge ruled in June that Alex Raimos, the owner of rental property in Brentwood, New York, violated the Fair Housing Act when he refused to rent an apartment to an applicant and her daughter because the applicant's daughter has cerebral palsy. The judge awarded the applicant a total of $50,530 in damages. The ALJ also ordered Raimos to pay the maximum civil penalty of $20,111 because the judge found that Raimos's conduct "was especially egregious and must be met with a harsh penalty to deter similar future behavior by him." [*HUD v. Raimos,* No. 21-JM-0160-FH-022 (HUD Office of Hearings and Appeals June 22, 2022)]

HUD Charge

[¶ 7.13] The following charge has been filed.

■ HUD has charged the owner and manager of the 21 Palms RV Resort Park in Davenport, Florida, with gender discrimination. According to HUD, after the complaining party came out as a transgender woman, the manager gave her a written notice telling her that she was required to "act as a man; talk as a man; dress as a man; and avoid tight clothing that is revealing sexual organs." [*HUD v. 21 Palms RV Resort, Inc*, FHEO No. 04-21-5434-8 (HUD Office of Hearings and Appeals July 5, 2022) (charge announced)]

HUD Settlement

[¶ 7.14] The following settlement has been reached.

■ The owner and operator of rental units in Massachusetts will pay a family with children under the age of six $11,000 under the terms of a consent decree resolving claims that they discriminated on the basis of familial status when they told the family they could not rent to a family with children under six because the unit had lead paint. Blossom Associates LLC and Maryanne Hart will also participate in fair housing training. [*HUD v. Blossom Associates LLC*, No 22-JM-0058-FH-101 (HUD Office of Administrative Law Judges April 18, 2022) (Initial decision and consent order signed)]

In This Report

The following opinions are among the matters discussed in this issue:

Federal Court Decisions

■ *CNY Fair Housing, Inc. v. Swiss Villages, LLC* [¶ 17,916] – race; national origin

■ *Mengistu v. Forestview Apartments, LLC* [¶ 17,917] – disability

■ *Firs Home Owners Association v. City of SeaTac* [¶ 17,918] – national origin

■ *United States v. J. Randolph Parry Architects, P.C.* [¶ 17,919] – disability; statute of limitations

■ *Marcolino v. Sweet Home Mobile Home LLC* [¶ 17,920] – race

■ *Oxford House, Inc. v. Township of North Bergen* [¶ 17,921] – disability

■ *Swanston v. City of Plano* [¶ 17,922] – disability; damages

■ *Arnold v. Elmington Property Management LLC* [¶ 17,923] – disability

■ *Horizon House, Inc. v. E. Norriton Township* [¶ 17,924] – disability

FILING INSTRUCTIONS

File this report bulletin on top of Bulletin 6.

Fair Housing-Fair Lending invites and welcomes submissions from our readers. Please send recent decisions, settlements, other news of interest, and suggestions to Carolyn Bayer, Editor; FHFL@nationalfairhousing.org; 1331 Pennsylvania Ave., NW, Suite 650, Washington, DC 20004; Fax (202) 371-9744. If possible, please include the case name, number, and court, and the names of the attorneys involved.