A Civil Rights Journal

Fair Housing – Fair Lending

September 1, 2018 Bulletin 9

Seventh Circuit Rules for Gay Resident in Lawsuit against Senior Community

[¶ 9.1] The Seventh Circuit in August reversed a lower court decision dismissing a lawsuit filed by a gay resident of a senior living community who alleged that the facility management violated the Fair Housing Act by failing to stop harassment against her by other tenants.

Marsha Wetzel, who is lesbian, lives at Glen St. Andrew Living Community in Niles, Illinois. Wetzel sued Glen St. Andrew and Glen St. Andrew managers, alleging that they violated the Fair Housing Act, 42 U.S.C. § § 3617 and 3604, by failing to stop a pattern of persistent harassment, threats, intimidation, and assaults by other residents even though she repeatedly complained about the harassment to facility directors and other staff. According to Wetzel, residents taunted her about her relationship with her deceased partner and their child; threatened her with bodily harm; bullied and intimidated her; and physically injured her because of her sexual orientation and because she had a child with another woman. Wetzel alleged that when she complained, the management took affirmative steps to retaliate against her.

District Judge Samuel Der-Yeghiayan dismissed Wetzel's claim under Section 3617 because he found that she had not alleged that the defendants had discriminatory motive or intent. He also dismissed Wetzel's claim under Section 3604(b), ruling that she had "failed to state facts that plausibly suggest a right to pursue relief." Wetzel appealed.

In an opinion written by Judge Kimba Wood, a Seventh Circuit panel reversed. The panel noted that Wetzel had "faced a torrent of physical

CONTENTS

and verbal abuse from other residents because she is openly lesbian" and had "implored St. Andrew's staff to help her." However, the staff had responded by limiting Wetzel's use of community facilities and retaliating against her for her complaints. Their actions included barring her from the lobby, halting her cleaning services, falsely accusing her of smoking in her room, and moving her to a less desirable table in the dining room.

The appeals court rejected Glen St. Andrew's argument that a landlord is not accountable for stopping tenant on tenant harassment unless the landlord acts with discriminatory intent. The court ruled that under the Fair Housing Act "the duty not to discriminate in housing conditions encompasses the duty not to permit known harassment on protected grounds." The court concluded that if the defendants had actual knowledge of the severe harassment and were deliberately indifferent to it, their actions were covered by the Fair Housing Act.

The panel also rejected the defendants' contention that Wetzel's claim does not fall within the class of post-acquisition incidents that are covered by Section 3604(b) of the Fair Housing Act. The court said that Section 3604(b) "protects not only against discrimination in the 'terms, conditions, or privileges of sale or rental,' but also discrimination 'in the provision of services or facilities in connection therewith.'" It ruled that Wetzel had a cognizable post-acquisition claim because the discrimination against her affected the provision of services and facilities connected to her rental. The court remanded the case to the district court. [*Wetzel v. Glen St. Andrew Living Community, LLC.* No. 17-1322, 2018 U.S. App. LEXIS 24193 (7th Cir. Aug. 27, 2018)]

Counsel: Karen Loewy, Lambda Legal Defense & Education Fund, New York, NY (Wetzel); James Ryan, Gordon & Rees Scully Mansukhani, LLP, Chicago, IL (Glen St. Andrew)

Ninth Circuit Reverses Judgment for Defendant in Disability Case

[¶ 9.2] In an unpublished memorandum opinion, a Ninth Circuit panel has reversed an order of summary judgment for the defendant in a disability discrimination case.

Neway Mengistu, who is disabled and uses a wheel chair, rented a two-bedroom apartment from the Housing Authority of the City of Los Angeles. The second bedroom was used by a full-time attendant. Mengistu asked the housing authority to rent him a

Fair Housing-Fair Lending is published monthly by National Fair Housing Alliance, 1331 Pennsylvania Ave., NW, Suite 650, Washington, DC 20004. For customer service or to subscribe, call 202-898-1661.
Copyright © 2018 by National Fair Housing Alliance
POSTMASTER: Send address changes to Fair Housing - Fair Lending, NFHA, 1331 Pennsylvania Ave., NW, Suite 650, Washington, DC 20004.

three-bedroom apartment as an accommodation for his disability so he could store large exercise equipment that he would use to strengthen his atrophying muscles in the third bedroom. Mengistu submitted documentation from his doctors in support of his request in which the doctors stated that the equipment was medically necessary; however, the housing authority denied his request for a third bedroom.

Mengistu sued the housing authority. The district court entered summary judgment for the housing authority, ruling that Mengistu had not sufficiently demonstrated a nexus between his disability and the need for a third bedroom. In a memorandum opinion, a Ninth Circuit panel reversed the judgment. The court ruled that "a reasonable jury could conclude that the requested accommodation was reasonable and that the agency denied Mr. Mengistu's request solely because it chose to disregard his medical evidence." Writing in dissent, Judge Milan Smith said that the district court had not erred because the third bedroom was not necessary to afford Mengistu an equal opportunity to use and enjoy a dwelling. [*Mengistu v. Housing Authority of Los Angeles*, No. 16-56591, 2018 U.S. App. LEXIS 20254 (9th Cir. July 20, 2018)]

Counsel: David Iyalomhe, Los Angeles, CA (Mengistu); Reginald Roberts, Jr., Los Angeles, CA (Housing Authority of Los Angeles)

Court Dismisses Lawsuit Challenging HUD's Withdrawal of AFFH Assessment Tool

[¶ 9.3] Ruling that the plaintiffs lacked standing, a federal district judge has dismissed a lawsuit filed by the National Fair Housing Alliance (NFHA) and two Texas nonprofits challenging HUD's withdrawal of the assessment tool that local governments used in complying with their obligation to affirmatively further fair housing.

In May, HUD published a notice in the Federal Register withdrawing the Local Government Assessment Tool (assessment tool), the information collection device it required local governments to use to meet their obligations under the Fair Housing Act and federal regulations to affirmatively further fair housing (AFFH). In a separate notice published the same day, HUD clarified that local recipients of HUD funds must continue to comply with their duty to affirmatively further fair housing by conducting analyses of impediments (AI) to fair housing.

NFHA, Texas Appleseed, and the Texas Low Income Housing Information Service sued HUD under the Administrative Procedure Act. In their complaint, they alleged that HUD's action suspending use of the assessment tool and reverting to the

© 2018 by National Fair Housing Alliance

previous AI assessment method effectively suspended HUD's regulations governing the obligations of localities to affirmatively further fair housing. The plaintiffs argued that HUD did not have the legal authority to withdraw the tool and that its actions were arbitrary and capricious. [See FHFL, ¶ 6.9, June 2018.] They filed a motion for a preliminary injunction, asking the court to order HUD to renew the assessment process immediately. New York State filed a motion to intervene as a plaintiff, and several states and cities filed an amicus brief in support of the plaintiffs.

In August, Chief District Court Judge Beryl Howell ruled that the plaintiffs lacked standing to bring their claims. Judge Howell ruled that they had not established an injury in fact. She found that because "significant requirements of the AFFH Rule remain intact" and because the plaintiffs have "continuing opportunities . . . to participate in the now somewhat more robust AI process . . . the extent to which the challenged HUD notices directly conflict or perceptibly impede the plaintiffs' mission-oriented activities seems difficult to measure or, in other words, are imperceptible." Judge Howell also found that the plaintiffs had not shown that they had had to divert resources to counteract the withdrawal of the assessment tool. She held they had not established causation or redressability because they had not suffered an injury in fact.

Judge Howell concluded that "the Court [was] without jurisdiction to micromanage agency choices on program implementation when the plaintiffs bringing suit lack a cognizable injury to their mission of having program participants fulfill an important statutory requirement more effectively and also do not have a cognizable injury that is caused by the challenged agency action or fully redressable, even if that agency action were ordered reversed."

Judge Howell also ruled that even if the plaintiffs had standing they would not have been entitled to a preliminary injunction because they had not established a likelihood of success on the merits.

Following the ruling, HUD announced on August 22 that it intended to move forward to amend the 2015 Affirmatively Furthering Fair Housing regulations. [*National Fair Housing Alliance v. Carson*, No. 1:18-cv-01076, 2018 U.S. Dist. LEXIS 139679 (D.D.C. August 17, 2018)]

Counsel: Sasha Samberg-Champion, Relman, Dane & Colfax PLLC, Washington, DC (National Fair Housing Alliance); Daniel Halainen, Dept. of Justice, Washington, DC (HUD)

Tenants State Familial Status And Disability Claims against California Landlords

[¶ 9.4] Several tenants of a Califor-

nia housing complex and the Fair Housing Council of Riverside County stated familial status and disability claims against the apartment complex, a federal district judge ruled in July.

Two families with children and a tenant who is legally blind and physically disabled sued the operators of the Perris Park Apartments in Perris, California, alleging familial status and disability discrimination in violation of the Fair Housing Act and California law. The Fair Housing Council of Riverside County is also a plaintiff.

The families with children alleged that after they made requests for repairs to their apartments, families with children were issued a notice that "all household members under the age of 18 must be supervised at all times by head of household or co-head of household." The plaintiffs' families received notices of lease violations and threats of eviction stating that their children were outside and unsupervised. Roberta Lee, the plaintiff with disabilities, alleged that Perris Park had violated the law by refusing her request for an accessible parking place near her unit as an accommodation for her disabilities. Although Lee did not drive, her relatives needed to park close to her unit and escort her to her unit because of her disabilities. The plaintiffs also alleged that Perris Park had engaged in a pattern or practice of discrimination.

Perris Park moved to dismiss the claims and to strike the lawsuit. District Judge Jesus Bernal granted the motion to dismiss the pattern or practice claims. However, he held that the plaintiffs had stated claims of disability and familial status discrimination. He also ruled that the Fair Housing Council had standing. [*Brown v. Perris Park Apartments Partnership*, No. EDCV 17-02487, 2018 U.S. Dist. LEXIS 136339 (C.D. Cal. July 17, 2018)]

Counsel: Margaret Elder, Huntington Beach, CA (plaintiffs); Eric Arevalo, Schumann Rosenberg, Costa Mesa, CA (Perris Park)

Fair Housing Organization and Property Owners State National Origin Claim against Homeowners Association

[¶ 9.5] A federal district court has denied a homeowners association's motion for summary judgment on a claim that it discriminated on the basis of national origin against Latinos. The court made its ruling in a lawsuit filed by a fair housing organization and four individual plaintiffs who alleged that the association discriminated against the individual plaintiffs on the basis of national origin when it denied them permission to build an outbuilding on their property.

Andrew Johnson, Carrie Masquida, and Nancy and Osvaldo Masquida, Carrie Masquida's parents, bought a lot at Lake Greenfield Estates in Gardner, Illinois. Carrie and

© 2018 by National Fair Housing Alliance

Osvaldo Masquida are Latino. Johnson and the Masquidas planned to build a house on the lot, but wanted to build an outbuilding first in which they could store their tractor and other equipment and materials. Although other property owners had constructed outbuildings on their lots with the consent of the Lake Greenfield Estates homeowners association, the association denied Johnson and the Masquidas permission to construct an outbuilding on their property.

Johnson and the Masquidas contacted H.O.P.E Fair Housing Center (H.O.P.E.). H.O.P.E. and the family sued the homeowners association and several members of the board of directors and the architecture committee. The plaintiffs alleged that the defendants had violated the Fair Housing Act by making a dwelling unavailable and by interfering with the family's exercise or enjoyment of their fair housing rights and their right to enjoy or hold property. They also alleged retaliation.

The defendants moved to dismiss. They argued that the outbuilding was not a dwelling protected by the Fair Housing Act and that the plaintiffs had not stated claims. In 2017, District Court Judge Rebecca Pallmeyer denied the defendants' motion. Judge Pallmeyer agreed that the outbuilding itself was not a dwelling. However, she concluded that the land on which the outbuilding and the future home were to be constructed should be considered a dwelling for purposes of the act. [See FHFL, ¶ 5.6, May 2017.]

The homeowners association then filed a motion for summary judgment. In July, Judge Pallmeyer denied the defendants' motion with regard to the plaintiffs' discrimination claim, ruling that there was sufficient evidence from which a reasonable jury could find that the defendants had intentionally discriminated against them. However, she granted summary judgment on the plaintiffs' retaliation claim. [*H.O.P.E. Inc. v. Lake Greenfield Homeowners Association*, No. 16 CV 5422, 2018 U.S. Dist. LEXIS 127679 (N.D. Ill. July 31, 2018)]

Counsel: Jennifer Soule, Soule, Bradtke & Lambert, Elmhurst, IL (plaintiffs); John Foreman, Tracy, Johnson & Wilson, Joliet, IL (Lake Greenfield Homeowners Association)

Failure to Inspect and Remediate Lead Paint May Violate Fair Housing Act

[¶ 9.6] Four tenants of the New York City Housing Authority with small children stated Fair Housing Act claims against the housing authority, the city, and city officials based on the housing authority's failure to inspect and remediate lead paint in its buildings, a federal district judge ruled in August.

The tenants sued the housing authority and the city under the Fair Housing Act, the Residential Lead Based Paint Hazard Reduction Act, and other laws. The plaintiffs alleged in their Fair Housing Act claim that

the housing authority's "failure to inspect and remediate lead paint caused or will cause a disparate impact on families with young children" and discourage families with young children from renting housing authority housing. The defendants moved to dismiss the plaintiffs' Fair Housing Act claim as well as their other claims.

Judge William H. Pauley III denied the defendants' motion to dismiss the plaintiffs' Fair Housing Act claim. He rejected their arguments that the plaintiffs lacked standing to bring their Fair Housing Act claim and that disparate impact claims cannot be asserted for conduct that occurs after a tenant moves in. He found that the "[p]laintiffs' allegations sufficiently support the inference that New York City families may have moved out of or been dissuaded from renting from NYCHA because of expected harm to their children," and the defendants' actions had a disparate impact on families with children. He also ruled that the plaintiffs had stated a claim under the Residential Lead Based Paint Hazard Reduction Act. [*Paige v. New York City Housing Authority*, No. 17cv7481, 2018 U.S. Dist. LEXIS 137238 (S.D.N.Y. Aug. 14, 2018)]

Counsel: Brendan Little, Levy Konigsberg LLP, New York, NY (Paige); Peter Kurshan, Herzfeld & Rubin, P.C., New York, NY (New York City Housing Authority)

Court Dismisses Race Discrimination Case against City of New York

[¶ 9.7] A New York court has dismissed a race discrimination case filed against the mayor of New York City by a nonprofit network of churches, several Brooklyn tenant organizations, and individual Brooklyn residents.

The plaintiffs sued Mayor Bill De Blasio, the City of New York, and Harrison Realty, LLC, challenging as discriminatory the rezoning of property owned by Harrison Realty in the area known as the Brooklyn Triangle. The property consists of two industrial blocks that Harrison wishes to develop for mixed commercial and residential use. The planned development would include 1,147 residential dwelling units, 344 of which would be "low to moderate income units." Forty percent of these units would be three- or four-bedroom apartments. According to the plaintiffs, these units are intended for white Hasidic tenants with large families "at the expense of Black and Latino families who tend, on average, to require fewer bedrooms."

Churches United for Fair Housing and the other plaintiffs charged that the city failed to affirmatively further fair housing when it approved the rezoning of the property by approving the rezoning "without even considering the impact it would have upon the segregation in North Brooklyn."

© 2018 by National Fair Housing Alliance

They alleged that the defendants violated the Fair Housing Act, the New York State Human Rights Law, the Equal Protection Clause, and other laws by discriminating on the basis of race, color, religion, and national origin.

Justice Arthur Engeron denied the plaintiffs' motion for a preliminary injunction and dismissed their complaint. He held that the plaintiffs did not have standing to challenge the defendants for violations of their duty to affirmatively further fair housing because Section 808 of the Fair Housing Act, 42 U.S. C. §3408, which imposes this duty, is not enforceable against a non-federal agency through a private right of action. He also ruled that the plaintiffs had not established a prima facie case of disparate treatment or disparate impact.

The plaintiffs have filed a notice of appeal. [*Churches United for Fair Housing v. De Blasio*, No. 151786-2018, 2018 NYLJ LEXIS 2675 (N.Y. Sup. Ct., NY Cty. Aug. 7, 2018)]

Counsel: Jessica Rose, Brooklyn Legal Services Corp., Brooklyn, NY (Churches United for Fair Housing); Zachary Carter, Corporation Counsel of the City of New York, New York, NY (De Blasio)

Recent settlements

[¶ 9.8] The following cases have been settled.

■ The Village of Tinley Park, Illinois, will pay its former planning director $360,000 under the terms of a settlement of a Justice Department lawsuit alleging that the village violated the Fair Housing Act by refusing to approve a low income housing development.

The Justice Department sued Tinley Park in 2016, alleging that it had failed to approve a proposal for a 47-unit multi-family affordable housing project in response to community opposition that was based on discriminatory attitudes toward African Americans and other minorities, even though the Tinley Park Planning Department had found that the project met all the specifications of the Tinley Park master plan and a set of requirements known as the Legacy Code.

Under the terms of the settlement, Tinley Park will pay the former planning director monetary damages because she was placed on leave as a result of her support for the housing development. The village will also develop a fair housing policy, provide training to officials and employees involved in the planning process, and hire a fair housing compliance officer. It will pay a $50,000 civil penalty. [*United States v. Village of Tinley Park, Illinois*, No. 16 CV 10848 (N.D. Ill. Aug. 24, 2018) (settlement signed)]

Counsel: Amie Murphy, Dept. of Justice, Washington, DC (United States)

■ Long Island Housing Services announced in July that it had

reached a settlement with BEA Properties LLC and other respondents.

Long Island Housing Services filed a complaint in 2016 with the New York State Division of Human Rights, charging that the respondents had engaged in unlawful discrimination based on disability and source of income. Under the terms of the settlement the respondents will develop a non-discrimination policy and an emotional support and service animal policy. The respondents will provide fair housing training to their agents and staff. They will pay Long Island Housing Services $19,200 in damages. [*Long Island Housing Services, Inc. v BEA Properties LLC,* No. 10185480 (New York State Division of Human Rights)]

Recent filings

[¶ 9.9] The following cases have been filed.

■ The Fair Housing Advocates Association has filed an administrative complaint with the Ohio Civil Rights Commission against the owners and operators of the Collinson Apartments in Akron, Ohio. FHAA alleges that Collinson discriminates on the basis of familial status by imposing overly restrictive rules on children who visit their elderly grandparents and other relatives. The restrictions include requiring all children to be under adult supervision and banning unsupervised children from the building. The tenants related to unsupervised children are given written notices of lease violations. [*Housing discrimination charge filed by Fair Housing Advocates Assoc. against Abel-Bishop & Clark Realty Co.* (Ohio Civil Rights Commission July 19, 2018) (charge filed)]

■ The Connecticut Fair Housing Center and Carmen Arroyo have sued CoreLogic Rental Property Solutions, LLC, alleging a pattern or practice of race, national origin, and disability discrimination. Carmen Arroyo is Latina and is the mother of a son who is unable to speak, walk, or care for himself as a result of an accident in 2015. CoreLogic is a consumer screening company that offers a tenant screening product to landlords. Arroyo's landlord uses a CoreLogic screening product to determine whether it will permit a person to live in the property.

When Arroyo asked her landlord for permission to move her son from a nursing home to her apartment, her landlord denied her request based on information from CoreLogic that her son had a criminal history. Her son had been arrested for shoplifting, but the charge was dismissed and he was not convicted of a crime. Nevertheless, CoreLogic found him unqualified for tenancy.

The plaintiffs charge that CoreLogic's policies and practices discriminate against the Arroyos on the basis of disability. They also charge

© 2018 by National Fair Housing Alliance

that its practice of disqualifying applicants for housing based on criminal records constitutes intentional discrimination based on race and national origin. They have asked the court to award declaratory and injunctive relief, actual and punitive damages, and attorneys' fees. [*Connecticut Fair Housing Center v. CoreLogic Rental Property Solutions LLC*, No. 3:18-cv-00705 (D. Conn. April 24, 2018) (complaint filed)]

Counsel: Greg Kirschner, Connecticut Fair Housing Center, Hartford, CT (plaintiffs)

■ The Fair Housing Justice Center (FHJC) and five testers for FHJC have sued the owners, managers, and a superintendent of two Brooklyn apartment buildings for race discrimination. The lawsuit alleges that Charm Equities and the other defendants "routinely lie to African Americans, telling them there are no available rental vacancies even as they usher in and encourage white applicants to apply to the actually available apartments." African American testers for FHJC were told that no units were available while white testers were shown apartments. The plaintiffs charge that the defendants have violated the Fair Housing Act, 42 U.S.C. §§ 1981 and 1982, and New York city and state law. They seek declaratory and injunctive relief, compensatory and punitive damages, and attorneys' fees. [*Fair Housing Justice Center, Inc. v. Charm Equities Ltd.*, No. 1:18-cv-05011 (E.D.N.Y. Sept. 5, 2018) (complaint filed)]

Counsel: Mariann Wang, Cuti Hecker Wang LLP, New York, NY (Fair Housing Justice Center)

HUD News

HUD Files Complaint against Facebook

[¶ 9.10] HUD filed a complaint against Facebook in August, alleging that Facebook has violated the Fair Housing Act by allowing landlords and home sellers to use its advertising platform to engage in housing discrimination. According to the complaint, "Facebook unlawfully discriminates by enabling advertisers to restrict which Facebook users receive housing related ads based on race, color, religion, sex, familial status, national origin and disability." HUD charges that Facebook's ad targeting tools invite advertisers to express unlawful preferences by suggesting discriminatory options. According to the complaint, Facebook's practices are ongoing. [*Assistant Secretary for Fair Housing & Equal Opportunity v. Facebook, Inc.* (Aug. 13, 2018) (complaint filed)]

HUD Issues Noncompliance Letter to Oakland County, Michigan; County Files Rebuttal

[¶ 9.11] In April, HUD informed Oakland County, Michigan, that it had found that the county, which is a recipient of Community Development Block Grant and HOME Investment

Partnership funds, had not carried out its CDBG and HOME programs in compliance with its civil rights related certifications and requirements. HUD also raised concerns as to whether the county's housing and community development programs may be contributing to the perpetuation of segregation.

Oakland County is comprised of 62 municipalities and has a population of more than 1,200,000. It is located in the metropolitan Detroit area. According to 2017 Census Bureau estimates, the population is 75.7 percent white, 14.2 percent black, and 4 percent Latino. In the letter sent to the county, HUD said that the county and its municipalities "have a documented history of using local regulations, policies, and processes to exclude racial and ethnic minority households." HUD noted that by some measures "the Detroit region is …the most segregated in the country." HUD asked the county to submit any evidence rebutting its conclusions and expressing its interest in resolving the issue by informal means.

In June, attorneys for the county submitted an extensive rebuttal to HUD's findings, maintaining that HUD's conclusion was "wrong on the facts and wrong on the law." The county maintains that its HUD-approved programs "are in full compliance with civil rights certifications and requirements, benefitting low-income households and non-white populations without any disparate impact."

HUD Settlement

[¶ 9.12] The following settlement has been reached.

■ HUD announced in August that it has entered into a conciliation agreement with Christian Church Homes and Garfield Park Village, LP, in Oakland and Santa Cruz California. The agreement resolves a complaint filed by a woman with a disability who used a wheelchair. She alleged that she was denied the opportunity to rent an accessible apartment at Garfield Park Village after she made a series of requests for modifications to the unit to accommodate her disability.

The respondents will pay the woman $7,500 and allow her to remain on the waiting list for an accessible apartment. When an apartment becomes available they will reconsider her modification requests. They will also modify their policies and procedures for processing accommodation and modification requests. [*Conciliation Agreement between HUD and Christian Church Homes*, FHEO No. 09-18-1036-8]

© 2018 by National Fair Housing Alliance

In This Report

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

Federal Court Decisions

■ *Wetzel v. Glen St. Andrew Living Community, LLC* [¶ 17,656] –sex

■ *Mengistu v. Housing Authority of Los Angeles* [¶17,657] – disability; reasonable accommodation

■ *National Fair Housing Alliance v. Carson* [¶17,658] – standing, AFFH, race

■ *Brown v. Perris Park Apartments Partnership* [¶17,659] – disability; familial status

■ *H.O.P.E. Inc. v. Lake Greenfield Homeowners Association* [¶17,660] – national origin; retaliation

■ *Paige v. New York City Housing Authority y* [¶17,661] – familial status

State Court Decision

■ *Churches United for Fair Housing v. De Blasio* [¶18,463] – standing; AFFH; race

FILING INSTRUCTIONS

File this report bulletin on top of Bulletin 7-8.

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.

Disclaimer: The material contained in Fair Housing-Fair Lending is for informational purposes only. Decisions of the courts are rendered daily and legislative acts are subject to amendment. While efforts have been made to ensure accuracy, you are cautioned that, before citing or relying on any case or legislative enactment reported here, you should review the law of your jurisdiction and confirm that decisions you rely upon have not been overruled or modified; or that the statutes have not been amended subsequent to the time this material was prepared.