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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NATIONAL FAIR HOUSING ALLIANCE;
FAIR HOUSING CENTER OF
METROPOLITAN DETROIT; FAIR
HOUSING JUSTICE CENTER; FAIR
HOUSING RIGHTS CENTER IN
SOUTHEASTERN PENNSYLVANIA; HOPE
FAIR HOUSING CENTER; LEXINGTON
FAIR HOUSING COUNCIL; LONG ISLAND
HOUSING SERVICES; METROPOLITAN
MILWAUKEE FAIR HOUSING COUNCIL;
OPEN COMMUNITIES; and SOUTH
SUBURBAN HOUSING CENTER,

Plaintiffs,

v.

REDFIN CORPORATION,

Defendant.

No.

COMPLAINT FOR VIOLATION OF THE
FAIR HOUSING ACT - FEDERAL
QUESTION JURISDICTION

JURY DEMAND

Plaintiffs National Fair Housing Alliance, Fair Housing Center of Metropolitan Detroit,
Fair Housing Justice Center, Fair Housing Rights Center in Southeastern Pennsylvania, HOPE
Fair Housing Center, Lexington Fair Housing Council, Long Island Housing Services,
Metropolitan Milwaukee Fair Housing Council, Open Communities, and South Suburban
Housing Center, by their attorneys MacDonald Hoague & Bayless and Emery Celli Brinckerhoff
Abady Ward & Maazel LLP, for their Complaint allege as follows:

I. REDFIN REDLINES

1
2 1. Harkening back to a time when federally mandated redlining and race restrictive
3 covenants created and solidified residential racial segregation in the United States, Defendant
4 Redfin Corporation offers its real estate services in predominately white neighborhoods at a
5 substantially greater rate than it does in communities of color, perpetuating the stark patterns of
6 housing segregation that continue to plague our nation.

7 2. Redfin redlines communities of color in this digital age by setting minimum home
8 listing prices in each housing market on its website under which it will not offer any real estate
9 brokerage services to buyers or sellers. These minimum price limits serve no legitimate purpose.
10 Redfin’s rules guarantee that it will receive a set minimum commission regardless of the price of
11 a home.

12 3. While the actual minimum price varies from one metropolitan area to another,
13 between counties, and between cities within counties, its impact is always the same—buyers and
14 sellers of homes in non-white areas are far less likely to be offered Redfin’s services and
15 discounts than buyers and sellers of homes in white areas.

16 4. Redfin’s policies and practices operate as a discriminatory stranglehold on
17 communities of color, often the very communities that have been battered by over a century of
18 residential segregation, systemic racism, and disinvestment. By disproportionately withholding
19 its services to homebuyers and sellers in these communities, Redfin disincentivizes homebuying
20 within these communities, reduces housing demand and values, and perpetuates residential
21 segregation.

22 5. Residential racial segregation creates a self-sustaining cycle of inequality. Where
23 people live matters. It impacts their lives—their access to transportation, quality education,
24 employment opportunities, quality credit, clean water, healthy food, and good health care.
25 Segregation contributes to the racial wealth gap between white and non-white households and to
26 the racialization of poverty.

27 6. By implementing policies that disproportionately deny real estate services to

1 communities of color, Redfin creates and perpetuates separate and unequal housing markets,
2 providing a higher level of services for homebuyers and sellers in white neighborhoods and a
3 lower level of service in non-white areas. Redfin’s policies and practices violate the Fair
4 Housing Act.

5 **II. JURISDICTION AND VENUE**

6 7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331, as
7 Plaintiffs assert federal claims under the FHA; under 28 U.S.C. § 1343(a)(4) as Plaintiffs seek to
8 secure equitable and other relief under federal civil rights laws; and under
9 42 U.S.C. § 3613(a)(1)(A) as Plaintiffs seek appropriate relief regarding a discriminatory
10 housing practice under the FHA.

11 8. Defendant Redfin’s principal place of business is in the Western District of
12 Washington and a substantial portion of the acts giving rise to Plaintiffs’ claims occurred in the
13 Western District of Washington. Venue is therefore lodged in this Court under 28 U.S.C.
14 § 1391(b).

15 **III. PARTIES**

16 **Plaintiffs**

17 9. Plaintiff National Fair Housing Alliance (“NFHA”) is a national, nonprofit, public
18 service organization incorporated under the laws of the Commonwealth of Virginia with its
19 principal place of business in Washington, D.C. NFHA is a nationwide consortium that includes
20 private, nonprofit, fair housing organizations as members. NFHA recognizes the importance of
21 “home” as a component of the American Dream and hopes to aid in the creation of diverse,
22 barrier-free communities across the nation.

23 10. NFHA’s sole mission is to end discrimination in housing and to promote
24 residential integration. NFHA works to eliminate housing discrimination and to ensure equal
25 opportunity for all people through leadership, education and outreach, membership services,
26 public policy initiatives, advocacy, consulting services, community development activities that
27 promote inclusive communities, and enforcement. NFHA engages in fair housing education and

1 enforcement in places throughout the United States where no local private fair housing
2 organization exists, as well as in other areas in the United States in cooperation with its
3 members. NFHA creates and distributes national educational media campaigns to teach people
4 about their rights and responsibilities under fair housing laws. NFHA also provides grants to
5 people to rent, purchase, or renovate housing; to stave off foreclosure; and to stabilize
6 neighborhoods harmed by the foreclosure crisis. NFHA engages in activities to help reduce the
7 racial homeownership gap and expand fair housing opportunities to underserved groups wishing
8 to purchase homes. NFHA works to affirmatively further fair housing in communities across the
9 United States. NFHA also works to eliminate discrimination in technologies used in the housing,
10 lending and insurance sectors – including digital platforms used to advertise or offer housing and
11 housing related services.

12 11. Plaintiff Fair Housing Center of Metropolitan Detroit (“FHCMD”) is a non-profit
13 organization that supports and encourages equal housing opportunities in the greater Detroit
14 metropolitan area. FHCMD’s mission is to ensure equal access to housing without
15 discrimination. FHCMD strives to fulfill its mission by providing intake counseling,
16 investigative and legal assistance to individuals alleging housing discrimination; providing
17 community outreach, education and fair housing training; and conducting housing-related
18 research.

19 12. Plaintiff Fair Housing Justice Center (“FHJC”) is a nonprofit organization based
20 in Queens, New York that serves New York City and seven suburban New York counties,
21 including Nassau and Suffolk. FHJC is dedicated to ensuring that all people have equal access to
22 housing opportunities in the New York City region by eliminating housing discrimination and
23 creating open, accessible, and inclusive communities. Among other things, FHJC provides
24 information to the public and other nonprofit organizations in the New York City region about
25 fair housing laws; provides intake counseling to individuals and organizations with allegations of
26 housing discrimination; and conducts testing and other investigations of allegations of housing
27 discrimination. FHJC also conducts testing investigations for government law enforcement

1 agencies; provides technical assistance to nonprofit organizations engaging in fair housing
2 enforcement activities; and engages in fair housing policy initiatives, including the publication
3 and dissemination of reports and educational materials.

4 13. Plaintiff Fair Housing Rights Center in Southeastern Pennsylvania (“FHRC”) is a
5 nonprofit organization that works in 13 counties throughout Southeastern and Central
6 Pennsylvania, including the City of Philadelphia (Philadelphia County) and Delaware County.
7 FHRC’s mission is to ensure equal access to housing opportunities for all persons. FHRC
8 educates the public on fair housing/fair lending laws; provides investigative and enforcement
9 services to individuals who have experienced housing discrimination; works with government to
10 increase the public’s knowledge and awareness of fair housing policies; audits the practices of
11 real estate and related industries; advocates to sustain good or amend harmful housing policies;
12 contracts with housing providers to improve compliance with fair housing laws; monitors the
13 community for compliance with applicable housing laws; and offers information and referrals on
14 housing-related issues.

15 14. Plaintiff HOPE Fair Housing Center (“HOPE”) is based in DuPage County,
16 Illinois and serves 30 counties in Northern and North Central Illinois. HOPE’s mission is to
17 establish and preserve viable, economically sound and inclusive communities. HOPE works to
18 end the devastation of housing discrimination by eliminating housing segregation and promoting
19 residential integration. To accomplish these goals, HOPE provides counseling and training to
20 persons seeking to rent or purchase housing and to housing providers on their rights and
21 responsibilities under fair housing laws. HOPE also provides education and outreach to the
22 community and community organizations and undertakes fair housing advocacy and enforcement
23 work.

24 15. Plaintiff Lexington Fair Housing Council (“LFHC”) is a non-profit organization
25 whose mission is to eradicate housing discrimination in all forms throughout the State of
26 Kentucky, including the Louisville metropolitan area. LFHC provides complaint intake
27 counseling and investigative services to individuals with allegations of housing discrimination.

1 Approximately 18% of complaints received by LFHC in 2019 came from Louisville. LFHC also
2 provides training on fair housing laws to community organizations, tenant groups, social service
3 agencies, and housing providers; prepares reports and other educational materials on fair housing
4 issues; and hosts conferences and community meetings on housing discrimination. In the
5 Louisville area, from 2018 through 2020, LFHC co-sponsored panel discussions on
6 gentrification in Louisville, ending segregation in Louisville, and racial inequities in the
7 Louisville eviction system; held a fair housing conference for housing providers and social
8 service agencies at the University of Louisville; provided training for Louisville homeless
9 service agencies on fair housing laws; and, in 2020, hosted virtual fair housing trainings offered
10 state-wide.

11 16. Plaintiff Long Island Housing Services (“LIHS”) is a nonprofit organization
12 serving Nassau and Suffolk Counties on Long Island, New York. LIHS is dedicated to ensuring
13 that all people have equal access to housing opportunities on Long Island by promoting equal
14 housing opportunity and racial and economic integration; and reducing and eliminating housing
15 discrimination. LIHS pursues these goals by providing counseling services to individuals and
16 families about fair housing and landlord/tenant rights, homelessness prevention, mortgage
17 default, pre-purchase and rental strategies, and government assisted housing programs. LIHS
18 promotes compliance with fair housing laws by (a) conducting fair housing investigations; (b)
19 assisting victims of discrimination to file administrative complaints and making legal referrals;
20 (c) providing fair housing education for both housing consumers and industry-related providers;
21 and (d) serving as a clearinghouse for housing-related information.

22 17. Plaintiff Metropolitan Milwaukee Fair Housing Council (“MMFHC”) is a private,
23 nonprofit organization that operates a full-service fair housing program serving the Milwaukee
24 metropolitan area and other Wisconsin counties. The purpose of MMFHC is to promote fair
25 housing throughout the State of Wisconsin by combatting illegal housing discrimination and by
26 creating and maintaining racially and economically integrated housing patterns. MMFHC’s
27 programs and services include case intake and counseling; investigative services; fair housing

1 outreach and education, including training for housing providers; professional support to
2 government agencies seeking to affirmatively further fair housing; and fair lending and inclusive
3 communities programs, including providing technical assistance on inclusionary housing policies
4 and conducting research and analysis of fair and affordable housing opportunities and
5 impediments.

6 18. Plaintiff Open Communities is a nonprofit corporation that services 17 north
7 suburban communities in the Chicago, Illinois area. The mission of Open Communities is to
8 educate, advocate, and organize to promote just and inclusive communities. One of Open
9 Communities' goals is the elimination of housing segregation and the promotion of residential
10 integration. Open Communities works to promote economically and culturally diverse
11 communities that are welcoming to all in north suburban Chicago. As part of its services, Open
12 Communities provides foreclosure counseling, financial literacy, rental assistance, and rental
13 mediation. Open Communities also offers counseling and investigative services in response to
14 allegations of housing discrimination, provides training to local community members about their
15 fair housing rights, and educates the housing provider industry.

16 19. Plaintiff South Suburban Housing Center ("SSHC") is a nonprofit community
17 organization that primarily serves the south metropolitan Chicago area, including the Southern
18 portions of the City of Chicago and Cook County. SSHC is dedicated to the promotion of a
19 unitary housing market that eliminates all forms of housing discrimination and fosters stable,
20 long-term diverse communities. To achieve this purpose, SSHC operates a host of fair housing
21 enforcement, counseling, education, and outreach programs. SSHC also works to preserve and
22 expand housing and mortgage lending choices through a variety of programs that include pre-
23 and post-purchase home buyer counseling, foreclosure prevention counseling, the administration
24 of mortgage and rental distress relief assistance, and rental referrals.

25 **Defendant**

26 20. Defendant Redfin Corporation is a Delaware corporation with a principal place of
27 business at 1099 Stewart Street, Suite 600, Seattle, Washington 98101. Redfin is an Internet-

1 based real estate broker that provides real estate services for sellers or buyers of residential real
2 estate, including single family homes.

3 **IV. FACTUAL BACKGROUND**

4 21. Redfin is a national real estate firm based in Seattle, Washington.

5 22. Redfin was founded in Seattle in or around 2004.

6 23. According to Redfin, its mission is to “redefine real estate in the customer’s
7 favor.”

8 24. Redfin provides most of its real estate services on-line (virtual service) and has
9 only a handful of physical offices.

10 25. Redfin’s website allows users to search through all of the homes for sale that are
11 listed with the Multiple Listing Service (“MLS”) and other similar listing services in the areas
12 where Redfin operates.

13 26. Currently, Redfin operates in more than 90 markets across the United States and
14 Canada.

15 27. Redfin’s real estate agents are Redfin employees.

16 28. Redfin’s real estate agents work with sellers and buyers by entering into seller
17 listing agreements and buyer agreements to provide its real estate services.

18 29. Redfin offers its brokerage services at a lower fee than traditional real estate
19 brokers.

20 30. For certain homes, Redfin offers to provide a real estate agent for both the buyer
21 and the seller.

22 31. Redfin provides substantial savings to customers who buy, sell, or both buy and
23 sell using a Redfin agent.

24 32. For buyers who buy a home using a Redfin agent, Redfin refunds a portion of its
25 commission at the closing—\$1,500 on average—so long as it is permitted to do so by state law
26 (the “Redfin Refund”).
27

1 33. Between 2018 and the present, Redfin has offered the Redfin Refund to buyers
2 using a Redfin agent so long as Redfin’s commission exceeds either 1% of the sale price of the
3 home or between \$6,000 to \$6,500, whichever is greater (the “Minimum Refund Policy”).

4 34. Thus, under Redfin’s Minimum Refund Policy, regardless of the sale price of the
5 home, Redfin does not offer the Redfin Refund to a buyer who uses a Redfin agent unless Redfin
6 receives a minimum commission ranging from \$6,000 to \$6,500.

7 35. For sellers, Redfin charges a commission of 1.5% of the listing price or Redfin’s
8 “minimum commission” in the market, whichever is greater (the “Minimum Commission
9 Policy”).

10 36. Redfin’s minimum commissions for sellers’ agents range from \$2,000 to \$6,500.

11 37. Thus, under Redfin’s Minimum Commission Policy, regardless of the listing price
12 of the home, when Redfin serves as the seller’s agent, Redfin is guaranteed to receive the
13 minimum commission that it has set for that market.

14 38. Sellers who list through Redfin receive: (1) a local Redfin Agent committed to
15 selling their home; (2) professional photos and a 3D Walkthrough; (3) premium placement on
16 Redfin.com; (4) listing placement on other major real estate sites; (5) yard signs, listing flyers,
17 and open houses; (6) a personalized dashboard to track buyers viewing the home; and (7) data
18 and local agent insights to help sellers price their homes (the “Redfin Perks”).

19 39. Redfin offers even more substantial discounts to customers who buy and sell
20 using Redfin’s agents.

21 40. Sellers who buy a new home through a Redfin agent within 365 days of selling
22 their old home through a Redfin agent pay a commission of only 1% of the listing price (or the
23 minimum commission in the market if it is greater than 1% of the listing price).

24 41. If the sale occurs first, the seller is initially charged a commission of 1.5% of the
25 listing price and then provided a 0.5% refund after purchasing another home with a Redfin agent
26 within 365 days.

1 **A. Redfin Offers Different Levels of Service Within Single Housing Markets**

2 42. Redfin does not offer its brokerage services for every home, even in the markets
3 in which Redfin operates.

4 43. For some homes, Redfin offers no service, for some it makes its agents available
5 to buyers and sellers and provides its best available service, and for others, Redfin directs
6 customers to partner agents instead of giving customers the option to buy or sell using a Redfin
7 agent.

8 44. Buyers who are directed to a Redfin partner agent are not eligible for the Redfin
9 Refund that is available to buyers who use a Redfin agent.

10 45. Sellers who use a Redfin partner agent are not eligible for Redfin's reduced
11 commissions or the Redfin Perks.

12 46. For many homes that are located in housing markets for which Redfin offers its
13 agents and partner agents, Redfin does not offer any services at all—it does not offer a Redfin
14 agent and it does not direct customers to a partner agent.

15 47. For these homes, Redfin says on its website that it does not provide any services
16 because the homes' listing price is below Redfin's minimum price limit (the "Minimum Price
17 Policy").

18 48. When a customer clicks on a home on Redfin's website that is below Redfin's
19 minimum price limit, a notification appears saying, "Redfin is currently unable to show this
20 property due to our minimum price limit." The notification directs the customer away from
21 Redfin's website.

22 49. Redfin's minimum price limit varies from region to region, as well as from area to
23 area within a given region or market in a manner that discriminates.

24 50. Thus, for example, Redfin's minimum price limit in the City of Chicago in June
25 2020 ranged from \$100,000-\$380,000, while in adjacent, predominantly white DuPage County,
26 the minimum price limit was \$100,000.

1 51. Even more striking, in June 2020 Redfin did not offer its brokerage services (and
2 the associated discounts) to buyers and sellers of homes in the City of Chicago unless the home
3 met a minimum price threshold of \$400,000. In DuPage County, however, Redfin offered its
4 brokerage services (and the associated discounts) to buyers and sellers of homes that met a
5 minimum price threshold of only \$275,000.

6 52. Similarly, in June 2020, it was Redfin's practice not to offer its brokerage services
7 to buyers and sellers in the City of Detroit unless homes met a minimum price threshold of
8 \$700,000. In the rest of Wayne County, outside of the City limits, and in adjacent Oakland
9 County, Redfin offered its brokerage services to buyers and sellers of homes beginning at a
10 listing price of \$250,000.

11 53. Even within a single County, Redfin has applied its Minimum Price Policy in a
12 way that makes buyers and sellers of homes in non-white areas less likely to be able to use its
13 services. In predominantly non-white areas, Redfin sometimes has not offered its brokerage
14 services to buyers and sellers of homes that were listed *above* the minimum price threshold. In
15 predominantly white areas, on the other hand, Redfin engaged in less case-by-case evaluation
16 and was more likely to offer its services to buyers and sellers so long as the home was listed
17 above the minimum price threshold.

18 54. Because of its Minimum Price Policy, Redfin is significantly more likely not to
19 offer its real estate brokerage services for buyers or sellers of homes in predominantly non-white
20 neighborhoods than for buyers and sellers of homes in predominantly white neighborhoods.

21 55. Redfin's home-by-home exceptions to its own Minimum Price Policy underscore
22 that the policy, as applied by Redfin, exists to serve Redfin's individual preference or
23 convenience and that it is not required by necessity. Redfin's Minimum Price Policy is thus
24 arbitrary.

25 56. Redfin also offers its brokerage services to buyers and sellers of homes within a
26 limited range of prices. This range varies from one metropolitan area to another, between
27 counties and between cities and counties within the same metropolitan area.

1 57. No matter what price range Redfin uses at a specific moment in time to decide
2 when to offer its brokerage services, Redfin is significantly more likely to offer its best available
3 service, including the Redfin Refund, to buyers and sellers of homes in predominantly white
4 neighborhoods than buyers and sellers of homes in predominantly non-white neighborhoods.

5 58. In 2018, in addition to Redfin’s Minimum Price Policy, Redfin also offered no
6 services to certain homes simply because of the area in which they were located.

7 59. In 2018 in Chicago, for example, Redfin offered no service to homes located in
8 certain sections of the southside of the City of Chicago and adjacent areas of Cook County
9 because of the “area” in which the homes were located, which was predominantly non-white.

10 60. Also, in 2018, Redfin offered no service to homes located in predominantly non-
11 white and racially integrated areas in Wayne County, Michigan, south of the City of Detroit,
12 because of the “area” in which the homes were located. In stark contrast, Redfin offered its
13 brokerage services to buyers and sellers of homes located in predominantly white communities
14 west of the City of Detroit, but also in Wayne County.

15 61. Redfin’s Minimum Price Policy and its practices to restrict the type of service
16 Redfin offers by area and within housing markets, cannot be justified by the need to make a
17 profit. For lower priced homes, Redfin is protected by its Minimum Refund Policy and its
18 Minimum Commission Policy, which ensure that Redfin receives minimum commissions that
19 Redfin sets for the area, regardless of the price of the home.

20 62. Redfin’s policies and practices also cannot be justified by practical business
21 considerations, such as whether homes are located at a substantial geographic distance from
22 Redfin’s agents or offices. For example, Redfin offers no service to homes located in areas that
23 are adjacent to or within the same City or County as those areas where it offers its brokerage
24 services and discounts.

25 63. From 2018 to 2020, because of Redfin’s Minimum Price Policy and Redfin’s
26 application of that policy from one metropolitan area to a another, Redfin is more likely to offer
27 a greater level of brokerage services for homes in predominantly white communities and to offer

1 no service at all for homes in predominantly non-white communities.

2 64. As described in this Complaint, Redfin’s Minimum Price Policy and its practice
3 of restricting the areas where it offers brokerage services and discounts are unnecessary to
4 achieve a valid interest or legitimate objective, such as a practical business consideration or
5 profit. In addition, they are arbitrary and artificial because they are based on or determined by
6 Redfin’s individual preference or convenience rather than by necessity and because they are
7 created, caused, or produced by human decisionmakers at Redfin.

8 **B. Plaintiffs’ Investigative Methodology**

9 65. Between 2018 and 2020, Plaintiffs reviewed homes for sale posted on Redfin’s
10 website from ten different metropolitan areas.

11 66. During this time period, Plaintiffs compared the home locations for which Redfin
12 offered brokerage services and the associated discounts, with the home locations for which
13 Redfin offered no service because of its Minimum Price Policy.

14 67. Plaintiffs focused on the homes posted on Redfin’s website for which Redfin
15 offered its “Best Available Service” and the homes for which Redfin offered “No Service.”

16 68. Redfin’s Best Available Service, as used herein, refers to the most comprehensive
17 service Redfin provided within the market area at the time Plaintiffs studied Redfin’s website. In
18 all market areas, Redfin’s Best Available Service connects buyers and sellers to Redfin agents,
19 offers the Redfin Perks, and provides sellers with an opportunity to list their homes at a reduced
20 commission, pursuant to the Minimum Commission Policy. Where it is permitted by state law,
21 Redfin’s Best Available Service allows buyers to receive the Redfin Refund, so long as it is
22 available under the Redfin Minimum Policy.

23 69. For homes for which Redfin offers “No Service,” Redfin does not provide any
24 service; Redfin does not connect buyers or sellers to Redfin agents or partner agents, Redfin does
25 not offer its reduced commissions or the Redfin Refund, and Redfin does not offer the Redfin
26 Perks.

27 70. Plaintiffs analyzed the location of homes for sale posted on Redfin’s website

1 using zip codes.

2 71. Plaintiffs determined the racial composition of zip codes using U.S. Census data.

3 72. As used herein, an “Extremely White” zip code refers to a zip code in which 70%
4 or more of the residents were White Non-Hispanic according to Census data.

5 73. As used herein, an “Extremely Non-White” zip code refers to a zip code in which
6 70% or more of the residents were non-white¹ according to Census data.

7 74. Plaintiffs reviewed and compared the location of homes for sale for which Redfin
8 offered its Best Available Service and No Service within Extremely White zip codes and
9 Extremely Non-White zip codes. The results for the ten metropolitan areas Plaintiffs reviewed
10 are described below.

11 **C. City of Baltimore and Baltimore County - Maryland**

12 75. Plaintiffs reviewed homes for sale posted on Redfin’s website in the City of
13 Baltimore and Baltimore County, Maryland in November 2018 and June 2020.

14 76. In Baltimore County, Redfin’s Best Available Service allows buyers to receive
15 the Redfin Refund, so long as it is available under the Refund Minimum Policy.

16 **1. City of Baltimore and Baltimore County – November 19-20, 2018**

17 77. Plaintiffs reviewed and analyzed homes for sale in the City of Baltimore and
18 Baltimore County that were posted on Redfin’s website on November 19-20, 2018.

19 **a. Best Available Service**

20 78. 1,916 homes were located within Extremely Non-White zip codes. Of those
21 homes, 131—or 6.84%—were offered Redfin’s Best Available Service.

22 79. 1,333 homes were located within Extremely White zip codes. Of those homes,
23 677—or 50.79%—were offered Redfin’s Best Available Service.

24 80. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
25 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
26

27 ¹ For purposes of this Complaint, the term “non-white” means the total population minus all persons who are not White Non-Hispanic.

1 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 7.43.

2 81. Thus, on November 19-20, 2018, buyers and sellers of homes in Extremely White
3 zip codes were 7.43 times more likely to be offered Redfin’s Best Available Service than buyers
4 and sellers of homes in Extremely Non-White zip codes.

5 82. This disparity is statistically significant to a 99.99% confidence rate. That is,
6 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

7 **b. No Service**

8 83. Of the 1,916 homes that were located within Extremely Non-White zip codes,
9 801—or 41.81%—were “No Service” homes because they failed to meet the minimum price
10 threshold for the market under Redfin’s Minimum Price Policy.

11 84. Of the 1,333 homes that were located within Extremely White zip codes, 54—or
12 4.05%—were “No Service” homes because they failed to meet the minimum price threshold for
13 the market under Redfin’s Minimum Price Policy.

14 85. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
15 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
16 Service homes in Extremely White zip codes. The disparity ratio is 10.32.

17 86. Thus, on November 19-20, 2018, buyers and sellers of homes in Extremely Non-
18 White zip codes were 10.32 times more likely to be offered No Service by Redfin than buyers
19 and sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

20 87. This disparity is statistically significant to a 99.99% confidence rate. That is,
21 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

22 **2. City of Baltimore and Baltimore County – June 11, 2020**

23 88. Plaintiffs reviewed and analyzed the City of Baltimore and Baltimore County
24 homes for sale that were posted on Redfin’s website on June 11, 2020.

25 **a. Best Available Service**

26 89. 1,159 homes were located within Extremely Non-White zip codes. Of those
27 homes, 101—or 8.71%—were offered Redfin’s Best Available Service.

1 90. 822 homes were located within Extremely White zip codes. Of those homes,
2 580—or 58.39%—were offered Redfin’s Best Available Service.

3 91. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
4 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
5 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 6.70.

6 92. Thus, on June 11, 2020, buyers and sellers of homes in Extremely White zip
7 codes were 6.70 times more likely to be offered Redfin’s Best Available Service than buyers and
8 sellers of homes in Extremely Non-White zip codes.

9 93. This disparity is statistically significant to a 99.99% confidence rate. That is,
10 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

11 **b. No Service**

12 94. Of the 1,159 homes that were located within Extremely Non-White zip codes,
13 420—or 36.24%—were “No Service” homes because they failed to meet the minimum price
14 threshold for the market under Redfin’s Minimum Price Policy.

15 95. Of the 822 homes that were located within Extremely White zip codes, 63—or
16 7.66%—were “No Service” homes because they failed to meet the minimum price threshold for
17 the market under Redfin’s Minimum Price Policy.

18 96. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
19 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
20 Service homes in Extremely White zip codes. The disparity ratio is 5.73.

21 97. Thus, on June 11, 2020, buyers and sellers of homes in Extremely Non-White zip
22 codes were 5.73 times more likely to be offered No Service by Redfin than buyers and sellers of
23 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

24 98. This disparity is statistically significant to a 99.99% confidence rate. That is,
25 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

1 **3. Maps Showing the Stark Impact of Redfin’s Minimum Price Policy in City of**
2 **Baltimore and Baltimore County**

3 99. Below are maps showing the locations of homes for sale in the City of Baltimore
4 and Baltimore County that were posted on Redfin’s website on June 11, 2020 for which Redfin
5 offered its Best Available Service and homes for which Redfin offered No Service. Map 1
6 shows both the City of Baltimore and Baltimore County. Map 2 shows the City of Baltimore
7 only.

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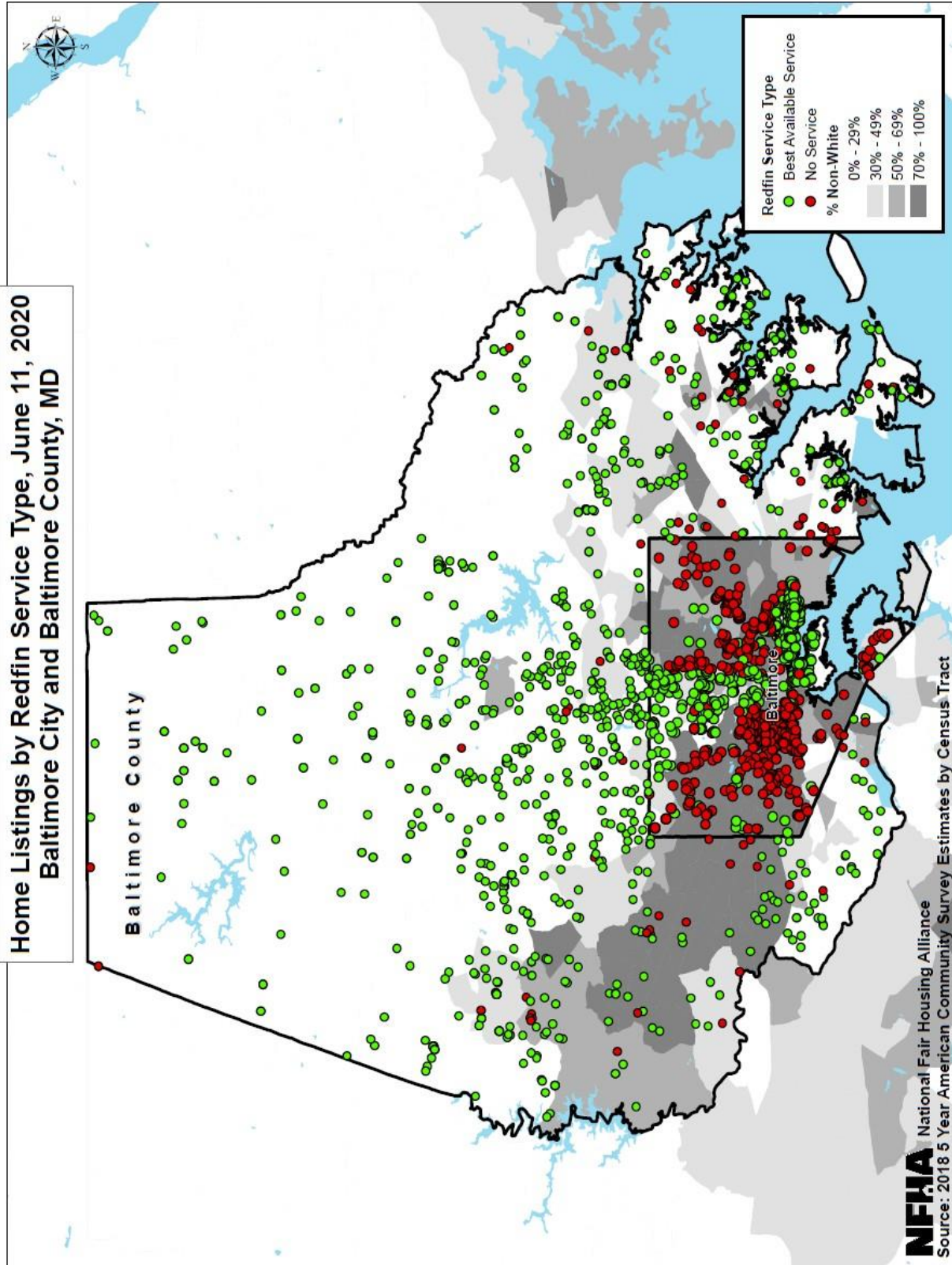
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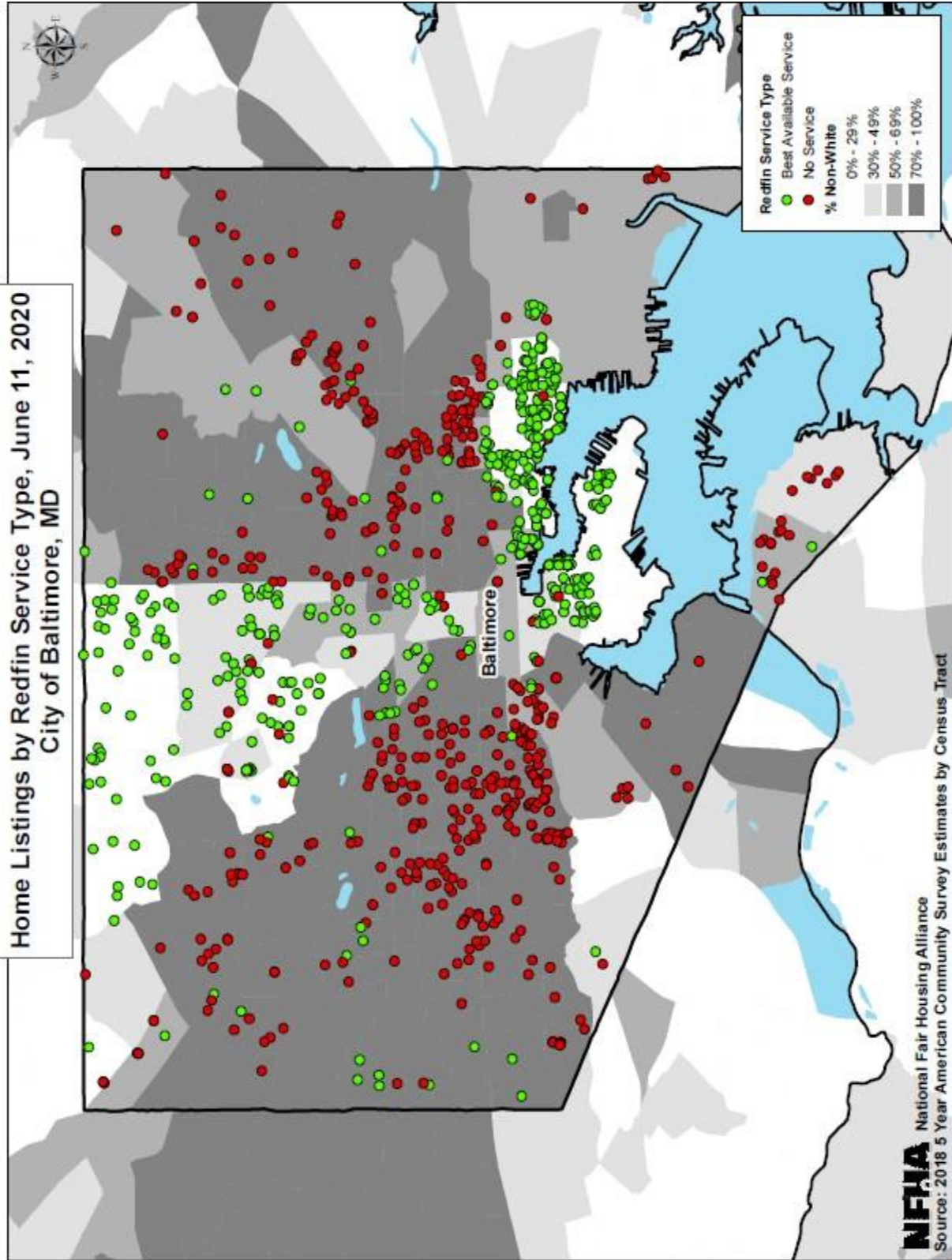
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MAP 1



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MAP 2



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1 **D. Chicago Metropolitan Area - Illinois**

2 100. Plaintiffs reviewed homes for sale posted on Redfin’s website from the City of
3 Chicago, Cook County and DuPage County in December 2018 and June 2020.

4 101. Plaintiffs’ review encompassed homes in Cook County, where the City of
5 Chicago is located, and DuPage County, which borders Cook County to the west (the “Chicago
6 Metropolitan Area”).

7 102. In the Chicago Metropolitan Area, Redfin’s Best Available Service allows buyers
8 to receive the Redfin Refund, so long as it is available under the Refund Minimum Policy.

9 **1. Chicago Metropolitan Area – December 17, 2018**

10 103. Plaintiffs reviewed and analyzed the Chicago Metropolitan Area homes for sale
11 posted on Redfin’s website on December 17, 2018.

12 **a. Best Available Service**

13 104. 4,800 homes were located within Extremely Non-White zip codes. Of those
14 homes, 885—or 18.44%—were offered Redfin’s Best Available Service.

15 105. 10,106 homes were located within Extremely White zip codes. Of those homes,
16 7,152—or 70.77%—were offered Redfin’s Best Available Service.

17 106. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
18 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
19 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 3.84.

20 107. Thus, on December 17, 2018, buyers and sellers of homes in Extremely White zip
21 codes were 3.84 times more likely to be offered Redfin’s Best Available Service than buyers and
22 sellers of homes in Extremely Non-White zip codes.

23 108. This disparity is statistically significant to a 99.99% confidence rate. That is,
24 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

25 **b. No Service**

26 109. Of the 4,800 homes that were located within Extremely Non-White zip codes,
27 1,585—or 33.02%—were “No Service” homes because they failed to meet the minimum price

1 threshold for the market under Redfin’s Minimum Price Policy.

2 110. Of the 10,106 homes that were located within Extremely White zip codes, 453—
3 or 4.48%—were “No Service” homes because they failed to meet the minimum price threshold
4 for the market under Redfin’s Minimum Price Policy.

5 111. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
6 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
7 Service homes in Extremely White zip codes. The disparity ratio is 7.37.

8 112. Thus, on December 17, 2018, buyers and sellers of homes in Extremely Non-
9 White zip codes were 7.37 times more likely to be offered No Service by Redfin than buyers and
10 sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

11 113. This disparity is statistically significant to a 99.99% confidence rate. That is,
12 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

13 114. In addition, Plaintiffs’ review showed that of the 4,800 homes that were located
14 within Extremely Non-White zip codes, Redfin offered “No Service” for 1509 of these homes
15 not because of their price but because of the area in which they were located.

16 115. No home located in Extremely White zip codes in the Chicago Metropolitan Area
17 was offered “No Service” by Redfin because of the area in which it was located.

18 **2. Chicago Metropolitan Area – June 18, 2020**

19 116. Plaintiffs also reviewed and analyzed Chicago Metropolitan Area homes for sale
20 posted on Redfin’s website on June 18, 2020.

21 **a. Best Available Service**

22 117. 5,118 homes were located within Extremely Non-White zip codes. Of those
23 homes, 541—or 10.57%—were offered Redfin’s Best Available Service.

24 118. 9,698 homes were located within Extremely White zip codes. Of those homes,
25 5,365—or 55.32%—were offered Redfin’s Best Available Service.

26 119. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
27 percentage of Best Available Service homes in Extremely White zip codes by the percentage of

1 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 5.23.

2 120. Thus, on June 18, 2020, buyers and sellers of homes in Extremely White zip
3 codes were 5.23 times more likely to be offered Redfin’s Best Available Service than buyers and
4 sellers of homes in Extremely Non-White zip codes.

5 121. This disparity is statistically significant to a 99.99% confidence rate. That is,
6 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

7 **b. No Service**

8 122. Of the 5,118 homes that were located within Extremely Non-White zip codes,
9 2,724—or 53.22%—were “No Service” homes because they failed to meet the minimum price
10 threshold for the market under Redfin’s Minimum Price Policy.

11 123. Of the 9,698 homes that were located within Extremely White zip codes, 502—or
12 5.18%—were “No Service” homes because they failed to meet the minimum price threshold for
13 the market under Redfin’s Minimum Price Policy.

14 124. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
15 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
16 Service homes in Extremely White zip codes. The disparity ratio is 10.28.

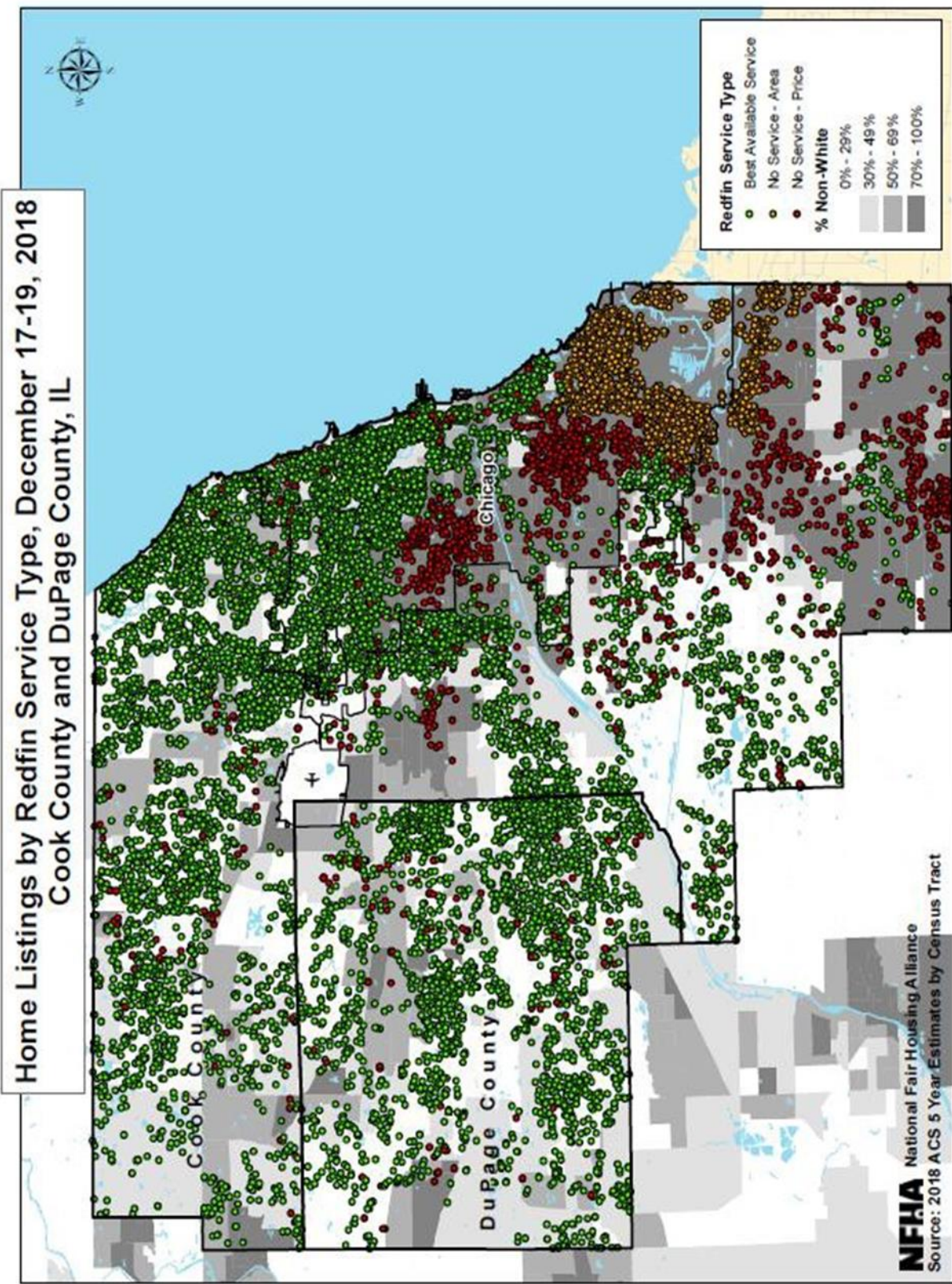
17 125. Thus, on June 18, 2020, buyers and sellers of homes in Extremely Non-White zip
18 codes were 10.28 times more likely to be offered No Service by Redfin than buyers and sellers of
19 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

20 126. This disparity is statistically significant to a 99.99% confidence rate. That is,
21 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

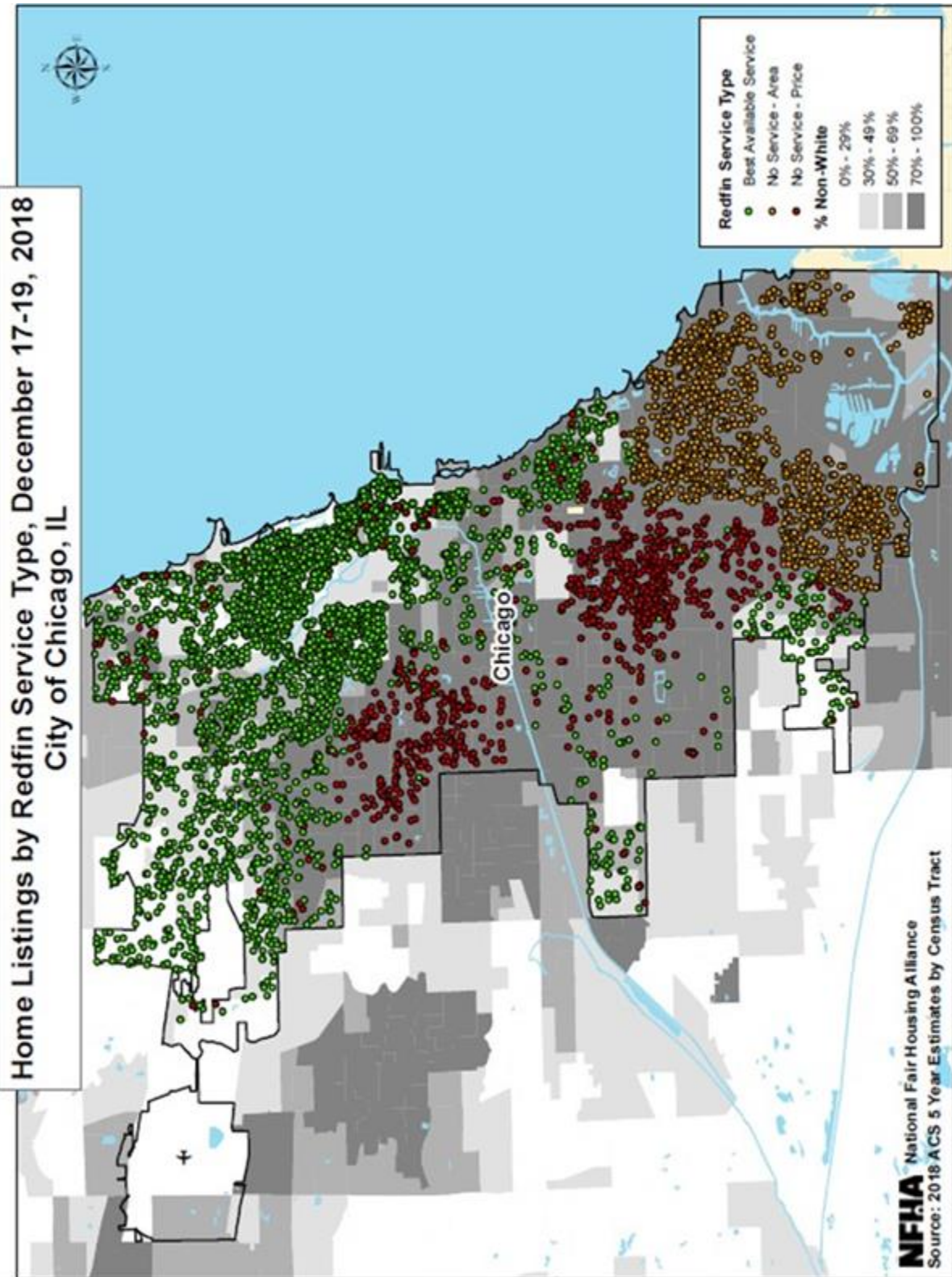
22 **3. Maps Showing the Stark Impact of Redfin’s Minimum Price Policy in the
Chicago Metropolitan Area**

23 127. Below are maps showing the locations of homes for sale in the Chicago
24 Metropolitan Area that were posted on Redfin’s website on December 17, 2018 for which Redfin
25 offered its Best Available Service and homes for which Redfin offered No Service due to price
26 and No Service due to area. Map 3 shows Cook and DuPage Counties. Map 4 shows the City of
27 Chicago.

MAP 3



MAP 4



1 **E. Detroit Metropolitan Area - Michigan**

2 128. Plaintiffs reviewed homes for sale posted on Redfin’s website from the City of
3 Detroit and certain suburban counties on the following dates: twice in November 2018, once in
4 December 2018, and once in June 2020.

5 129. Plaintiffs’ review encompassed homes in Wayne County, where the City of
6 Detroit is located, and the Counties of Oakland, Macomb and Washtenaw (the “Detroit
7 Metropolitan Area”).

8 130. In the Detroit Metropolitan Area, Redfin’s Best Available Service allows buyers
9 to receive the Redfin Refund, so long as it is available under the Refund Minimum Policy.

10 **1. Detroit Metropolitan Area – November 19, 2018**

11 131. Plaintiffs reviewed and analyzed homes for sale in the Detroit Metropolitan Area
12 that were posted on Redfin’s website on November 19, 2018.

13 **a. Best Available Service**

14 132. 2,635 homes were located within Extremely Non-White zip codes. Of those
15 homes, 187—or 7.10%—were offered Redfin’s Best Available Service.

16 133. 9,802 homes were located within Extremely White zip codes. Of those homes,
17 5,438—or 55.48%—were offered Redfin’s Best Available Service.

18 134. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
19 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
20 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 7.82.

21 135. Thus, on November 19, 2018, buyers and sellers of homes in Extremely White zip
22 codes were 7.82 times more likely to be offered Redfin’s Best Available Service than buyers and
23 sellers of homes in Extremely Non-White zip codes.

24 136. This disparity is statistically significant to a 99.99% confidence rate. That is,
25 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

1 **b. No Service**

2 137. Of the 2,635 homes that were located within Extremely Non-White zip codes,
3 2,079—or 78.90%—were “No Service” homes because they failed to meet the minimum price
4 threshold for the market under Redfin’s Minimum Price Policy.

5 138. Of the 9,802 homes that were located within Extremely White zip codes, 1,867—
6 or 19.05%—were “No Service” homes because they failed to meet the minimum price threshold
7 for the market under Redfin’s Minimum Price Policy.

8 139. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
9 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
10 Service homes in Extremely White zip codes. The disparity ratio is 4.14.

11 140. Thus, on November 19, 2018, buyers and sellers of homes in Extremely Non-
12 White zip codes were 4.14 times more likely to be offered No Service by Redfin than buyers and
13 sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

14 141. This disparity is statistically significant to a 99.99% confidence rate. That is,
15 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

16 142. In addition, Plaintiffs’ review showed that Redfin offered “No Service” for all
17 homes located in Wayne County south of the City of Detroit not because of their price but
18 because of the area in which they were located. In contrast, Redfin offered its Best Available
19 Service for homes located in Wayne County west of the City of Detroit in Extremely White zip
20 codes.

21 **2. Detroit Metropolitan Area – June 21, 2020**

22 143. Plaintiffs also reviewed and analyzed homes for sale in the Detroit Metropolitan
23 Area that were posted on Redfin’s website on June 21, 2020.

24 **a. Best Available Service**

25 144. 2,418 homes were located within Extremely Non-White zip codes. Of those
26 homes, 49—or 2.03%—were offered Redfin’s Best Available Service.

1 145. 9,761 homes were located within Extremely White zip codes. Of those homes,
2 3,886—or 39.81%—were offered Redfin’s Best Available Service.

3 146. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
4 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
5 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 19.65.

6 147. Thus, on June 21, 2020, buyers and sellers of homes in Extremely White zip
7 codes were 19.65 times more likely to be offered Redfin’s Best Available Service than buyers
8 and sellers of homes in Extremely Non-White zip codes.

9 148. This disparity is statistically significant to a 99.99% confidence rate. That is,
10 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

11 **b. No Service**

12 149. Of the 2,418 homes that were located within Extremely Non-White zip codes,
13 1,937—or 80.11%—were “No Service” homes because they failed to meet the minimum price
14 threshold for the market under Redfin’s Minimum Price Policy.

15 150. Of the 9,761 homes that were located within Extremely White zip codes, 1,767—
16 or 18.10%—were “No Service” homes because they failed to meet the minimum price threshold
17 for the market under Redfin’s Minimum Price Policy.

18 151. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
19 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
20 Service homes in Extremely White zip codes. The disparity ratio is 4.43.

21 152. Thus, on June 21, 2020, buyers and sellers of homes in Extremely Non-White zip
22 codes were 4.43 times more likely to be offered No Service by Redfin than buyers and sellers of
23 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

24 153. This disparity is statistically significant to a 99.99% confidence rate. That is,
25 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

1 **3. Detroit Metropolitan Area – Other Dates**

2 154. Plaintiffs also reviewed and analyzed homes for sale in the Detroit Metropolitan
3 Area that were posted on Redfin’s website on November 2, 2018, and December 7, 2018.

4 155. On each of these dates, buyers and sellers of homes in Extremely White zip codes
5 were far more likely to be offered Redfin’s Best Available Service than buyers and sellers of
6 homes in Extremely Non-White zip codes. On each date, the disparity was statistically
7 significant.

8 156. Also, on each of these dates, buyers and sellers of homes in Extremely Non-White
9 zip codes were far more likely to be offered No Service by Redfin than buyers and sellers of
10 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy. On each date,
11 the disparity was statistically significant.

12 **4. Maps Showing the Stark Impact of Redfin’s Minimum Price Policy in the**
13 **Detroit Metropolitan Area**

14 157. Below are maps showing the locations of homes for sale in Wayne, Oakland and
15 Macomb Counties that were posted on Redfin’s website on November 19, 2018 for which Redfin
16 offered its Best Available Service and homes for which Redfin offered No Service. Map 5
17 shows Wayne, Oakland and Macomb Counties; Map 6 shows the City of Detroit only; and Map
18 7 shows Wayne County including the City of Detroit.

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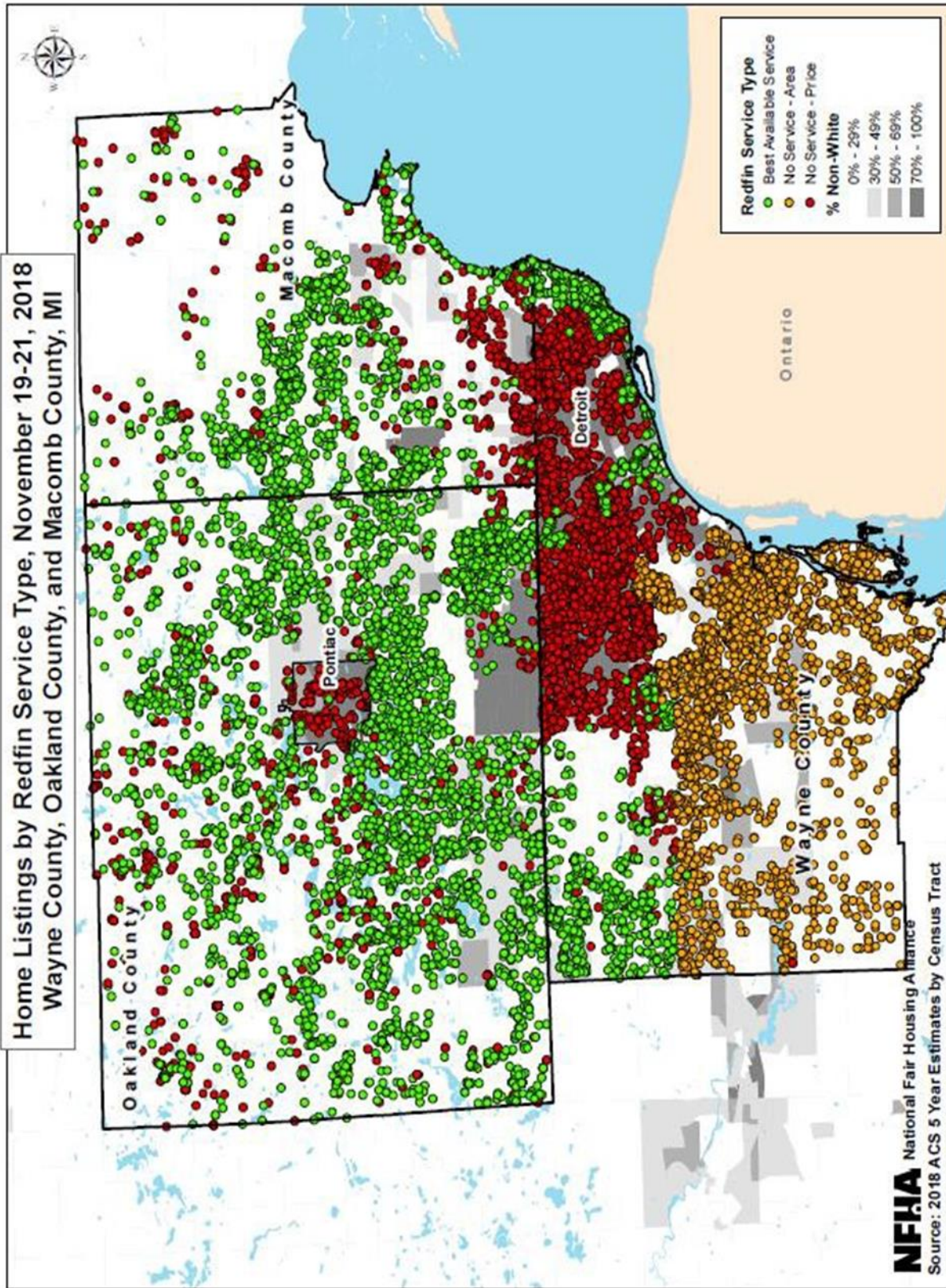
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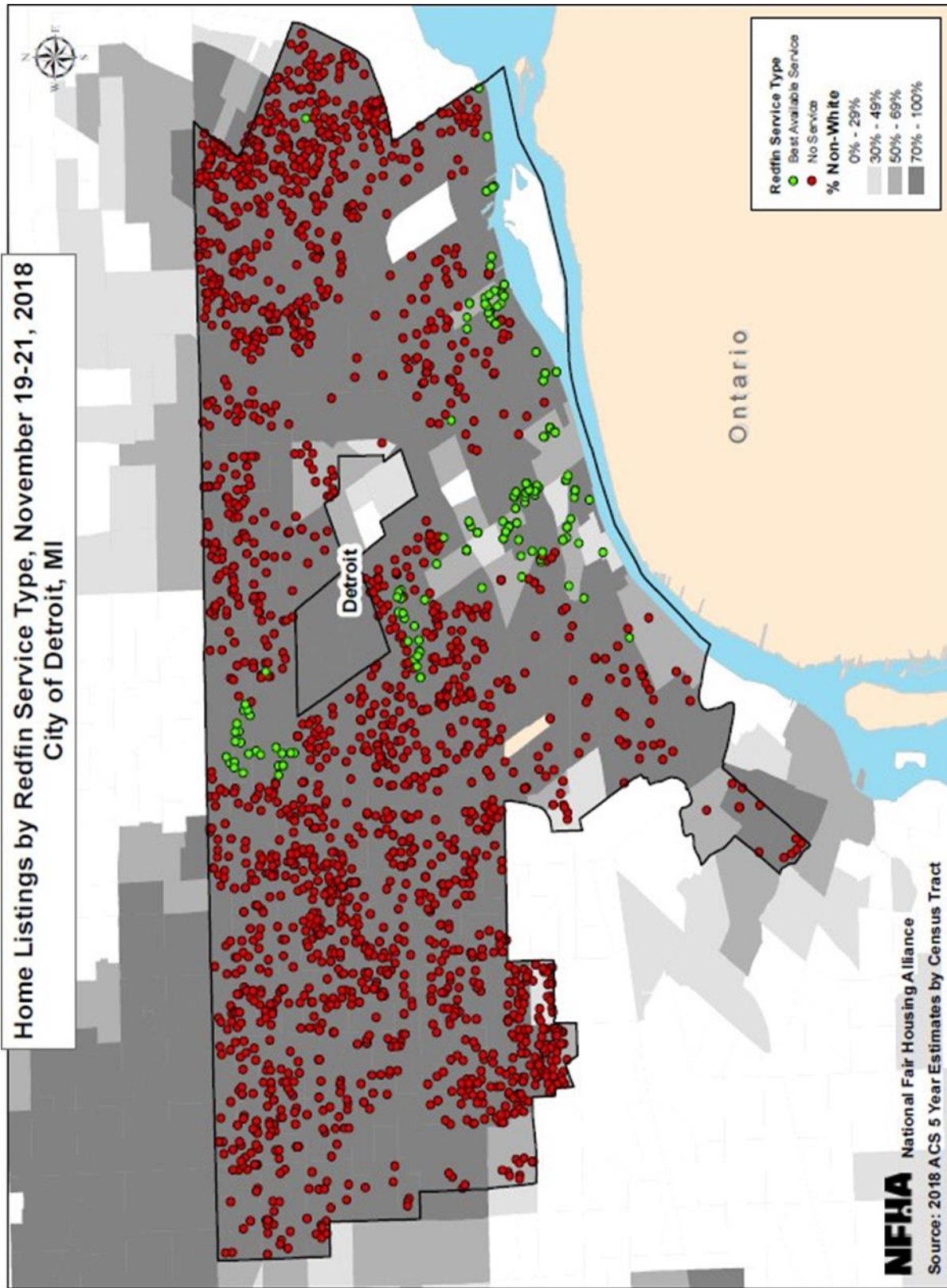
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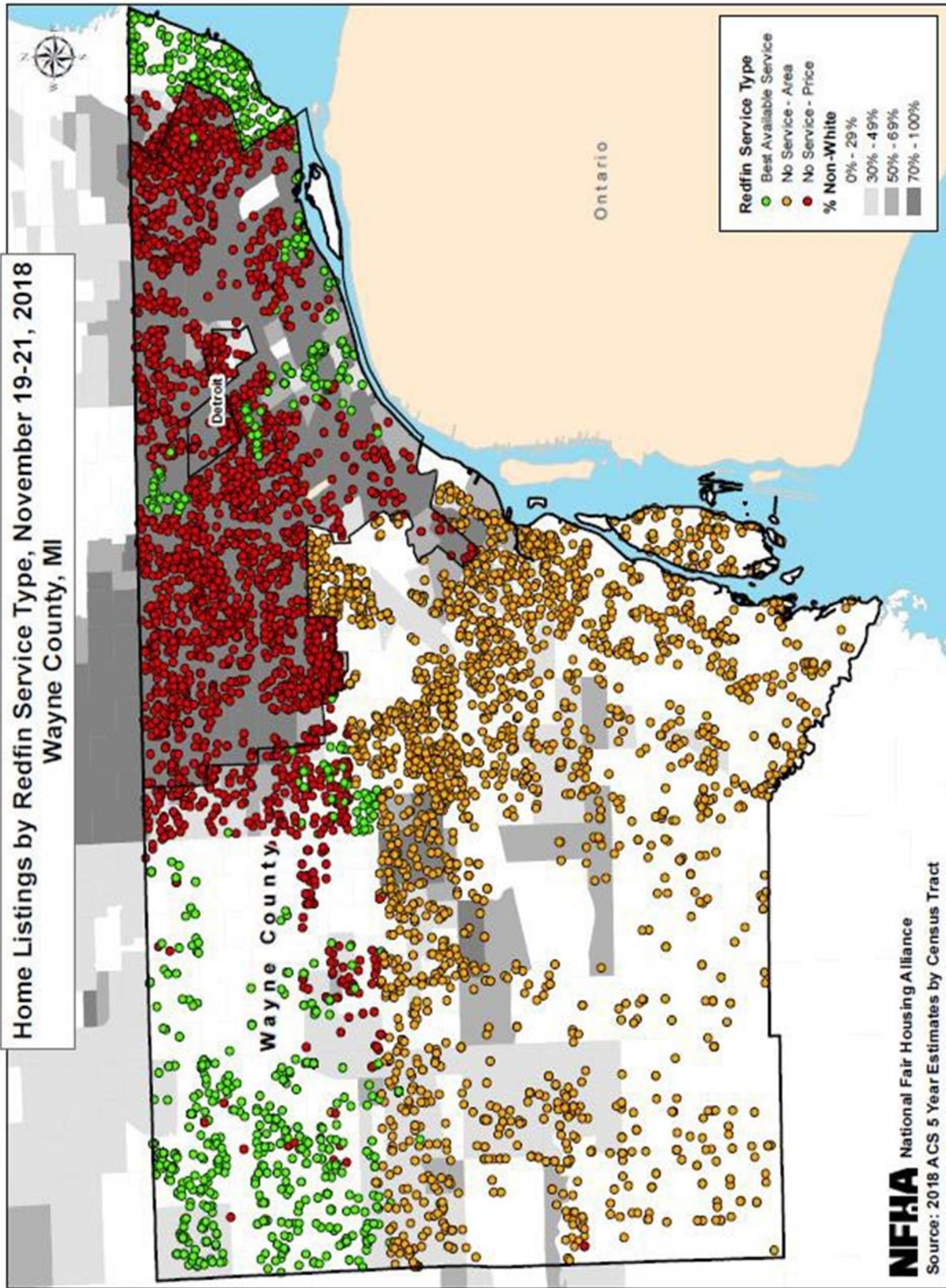
MAP 5



MAP 6



MAP 7



1 **F. Kansas City Metropolitan Area – Kansas and Missouri**

2 158. Plaintiffs reviewed homes for sale posted on Redfin’s website from the Kansas
3 City metropolitan area in January 2019 and June 2020.

4 159. Plaintiffs’ review encompassed homes in the City of Kansas City and in Jackson
5 County, Clay County, and Platte County (Missouri Counties) and Wyandotte County, Johnson
6 County and Leavenworth County (Kansas Counties) (collectively, “Kansas City Metropolitan
7 Area”).

8 160. Because of state laws applicable in the Kansas City Metropolitan Area, Redfin’s
9 Best Available Service does *not* allow buyers to receive the Redfin Refund.

10 **1. Kansas City Metropolitan Area – January 2, 2019**

11 161. Plaintiffs reviewed and analyzed homes for sale in the Kansas City Metropolitan
12 Area that were posted on Redfin’s website on January 2, 2019.

13 **a. Best Available Service**

14 162. 352 homes were located within Extremely Non-White zip codes. Of those homes,
15 3—or 0.85%—were offered Redfin’s Best Available Service.

16 163. 5,459 homes were located within Extremely White zip codes. Of those homes,
17 3,216—or 58.91%—were offered Redfin’s Best Available Service.

18 164. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
19 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
20 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 69.12.

21 165. Thus, on January 2, 2019, buyers and sellers of homes in Extremely White zip
22 codes were 69.12 times more likely to be offered Redfin’s Best Available Service than buyers
23 and sellers of homes in Extremely Non-White zip codes.

24 166. This disparity is statistically significant to a 99.99% confidence rate. That is,
25 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

1 **b. No Service**

2 167. Of the 352 homes that were located within Extremely Non-White zip codes,
3 272—or 77.27%—were “No Service” homes because they failed to meet the minimum price
4 threshold for the market under Redfin’s Minimum Price Policy.

5 168. Of the 5,459 homes that were located within Extremely White zip codes, 814—or
6 14.91%—were “No Service” homes because they failed to meet the minimum price threshold for
7 the market under Redfin’s Minimum Price Policy.

8 169. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
9 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
10 Service homes in Extremely White zip codes. The disparity ratio is 5.18.

11 170. Thus, on January 2, 2019, buyers and sellers of homes in Extremely Non-White
12 zip codes were 5.18 times more likely to be offered No Service by Redfin than buyers and sellers
13 of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

14 171. This disparity is statistically significant to a 99.99% confidence rate. That is,
15 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

16 **2. Kansas City Metropolitan Area – June 12, 2020**

17 172. Plaintiffs also reviewed and analyzed the Kansas City Metropolitan Area homes
18 for sale that were posted on Redfin’s website on June 12, 2020.

19 **a. Best Available Service**

20 173. 218 homes were located within Extremely Non-White zip codes. Of those homes,
21 16—or 7.34%—were offered Redfin’s Best Available Service.

22 174. 4,550 homes were located within Extremely White zip codes. Of those homes,
23 2,391—or 52.55%—were offered Redfin’s Best Available Service.

24 175. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
25 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
26 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 7.16.

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1 176. Thus, on June 12, 2020, buyers and sellers of homes in Extremely White zip
2 codes were 7.16 times more likely to be offered Redfin’s Best Available Service than buyers and
3 sellers of homes in Extremely Non-White zip codes.

4 177. This disparity is statistically significant to a 99.99% confidence rate. That is,
5 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

6 **b. No Service**

7 178. Of the 218 homes that were located within Extremely Non-White zip codes,
8 127—or 58.26%—were “No Service” homes because they failed to meet the minimum price
9 threshold for the market under Redfin’s Minimum Price Policy.

10 179. Of the 4,550 homes that were located within Extremely White zip codes, 649—or
11 14.26%—were “No Service” homes because they failed to meet the minimum price threshold for
12 the market under Redfin’s Minimum Price Policy.

13 180. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
14 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
15 Service homes in Extremely White zip codes. The disparity ratio is 4.08.

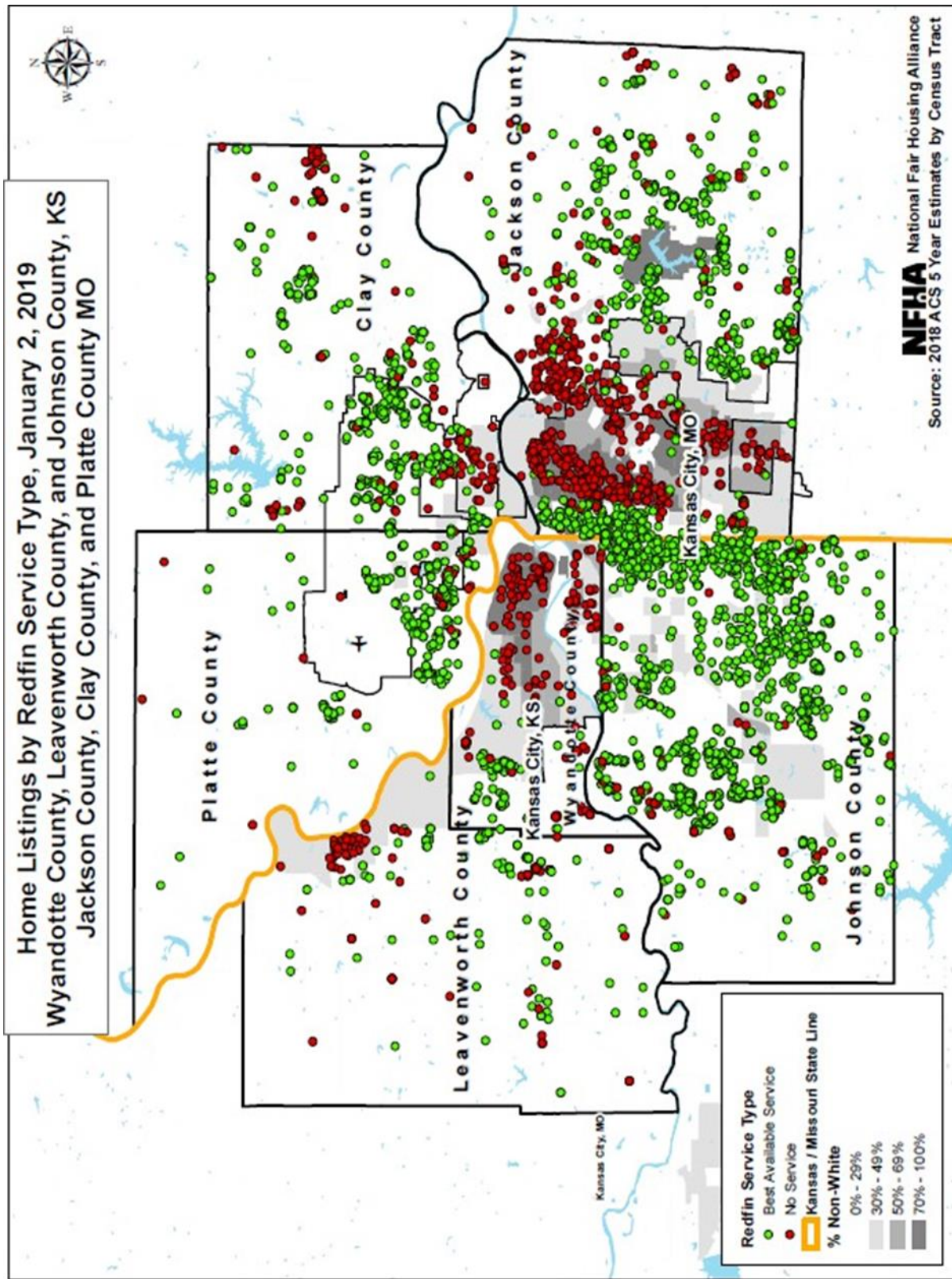
16 181. Thus, on June 12, 2020, buyers and sellers of homes in Extremely Non-White zip
17 codes were 4.08 times more likely to be offered No Service by Redfin than buyers and sellers of
18 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

19 182. This disparity is statistically significant to a 99% confidence rate. That is, there is
20 less than a 1-in-100 chance that this disparity could be caused randomly.

21 **3. Maps Showing the Stark Impact of Redfin’s Minimum Price Policy in the**
22 **Kansas City Metropolitan Area**

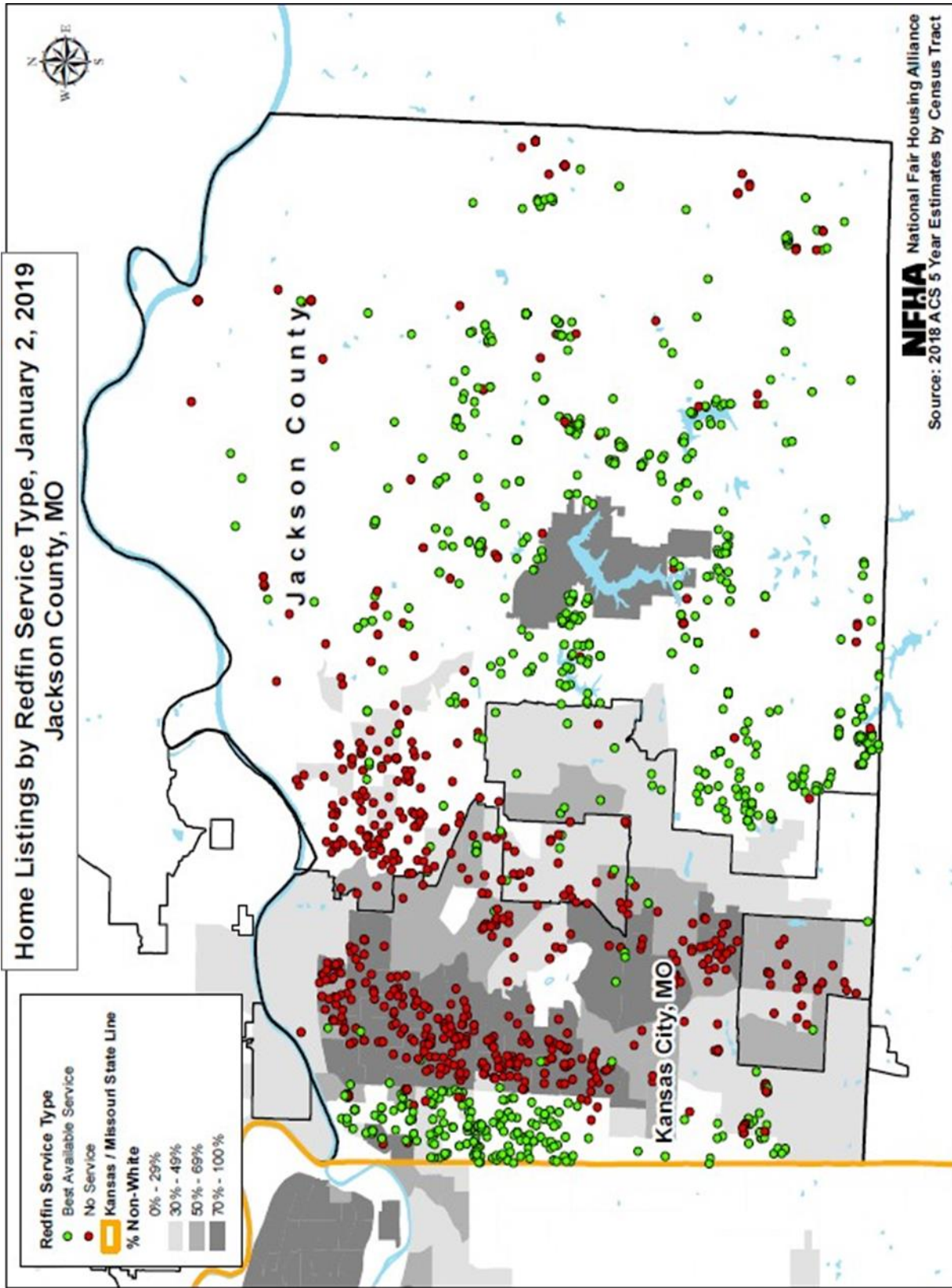
23 183. Below are maps showing the locations of homes for sale in the Kansas City
24 Metropolitan Area that were posted on Redfin’s website on January 2, 2019 for which Redfin
25 offered its Best Available Service and homes for which Redfin offered No Service. Map 8
26 shows six Kansas City metropolitan area counties in Kansas and Missouri. Map 9 shows
27 Jackson County, Missouri, including Kansas City, Missouri.

MAP 8



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MAP 9



1 **G. Long Island (Nassau and Suffolk Counties) - New York**

2 184. Plaintiffs reviewed homes for sale posted on Redfin’s website from the two
3 counties that comprise Long Island, New York - Nassau and Suffolk - on August 20, 2020.

4 185. On Long Island, Redfin’s Best Available Service allows buyers to receive the
5 Redfin Refund, so long as it is available under the Refund Minimum Policy.

6 **1. Long Island – August 20, 2020**

7 186. Plaintiffs reviewed and analyzed the Long Island homes for sale posted on
8 Redfin’s website on August 20, 2020.

9 **a. Best Available Service**

10 187. 610 homes were located within Extremely Non-White zip codes. Of those homes,
11 3—or 0.49%—were offered Redfin’s Best Available Service.

12 188. 6,272 homes were located within Extremely White zip codes. Of those homes,
13 1,697—or 27.06%—were offered Redfin’s Best Available Service.

14 189. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
15 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
16 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 55.02.

17 190. Thus, on August 20, 2020, buyers and sellers of homes in Extremely White zip
18 codes were 55.02 times more likely to be offered Redfin’s Best Available Service than buyers
19 and sellers of homes in Extremely Non-White zip codes.

20 191. This disparity is statistically significant to a 99.99% confidence rate. That is,
21 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

22 **b. No Service**

23 192. Of the 610 homes that were located within Extremely Non-White zip codes,
24 453—or 74.26%—were “No Service” homes because they failed to meet the minimum price
25 threshold for the market under Redfin’s Minimum Price Policy.

26 193. Of the 6,272 homes that were located within Extremely White zip codes, 1,847—
27 or 29.45%—were “No Service” homes because they failed to meet the minimum price threshold

1 for the market under Redfin’s Minimum Price Policy.

2 194. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
3 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
4 Service homes in Extremely White zip codes. The disparity ratio is 2.52.

5 195. Thus, on August 20, 2020, buyers and sellers of homes in Extremely Non-White
6 zip codes were 2.52 times more likely to be offered No Service by Redfin than buyers and sellers
7 of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

8 196. This disparity is statistically significant to a 99.99% confidence rate. That is,
9 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

10 **2. Maps Showing the Stark Impact of Redfin’s Minimum Price Policy on Long**
11 **Island**

12 197. Below are maps showing the locations of homes for sale on Long Island that were
13 posted on Redfin’s website on August 20, 2020 for which Redfin offered its Best Available
14 Service and homes for which Redfin offered No Service. Map 10 shows Nassau County and
15 Map 11 shows Suffolk County, Long Island.

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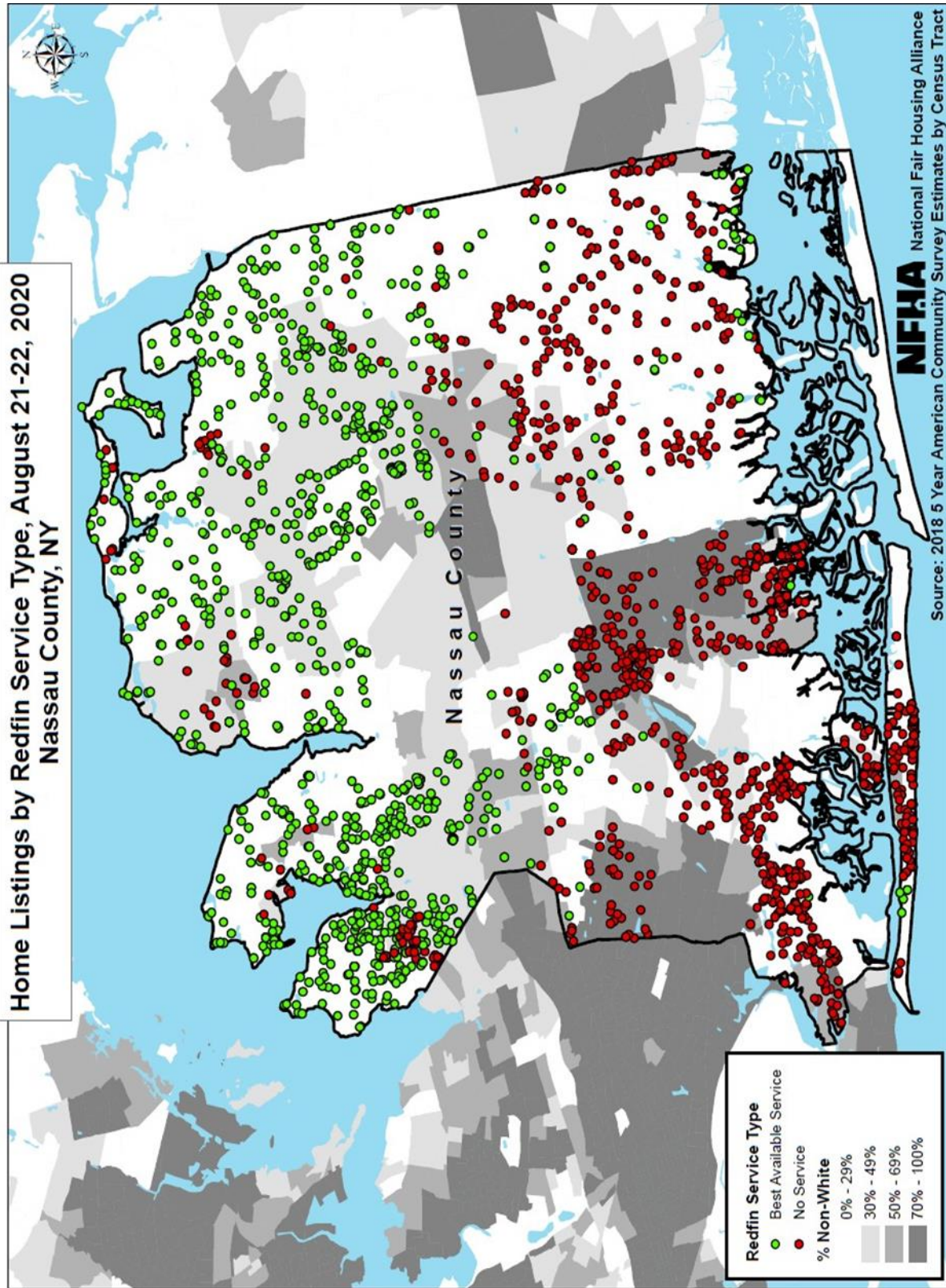
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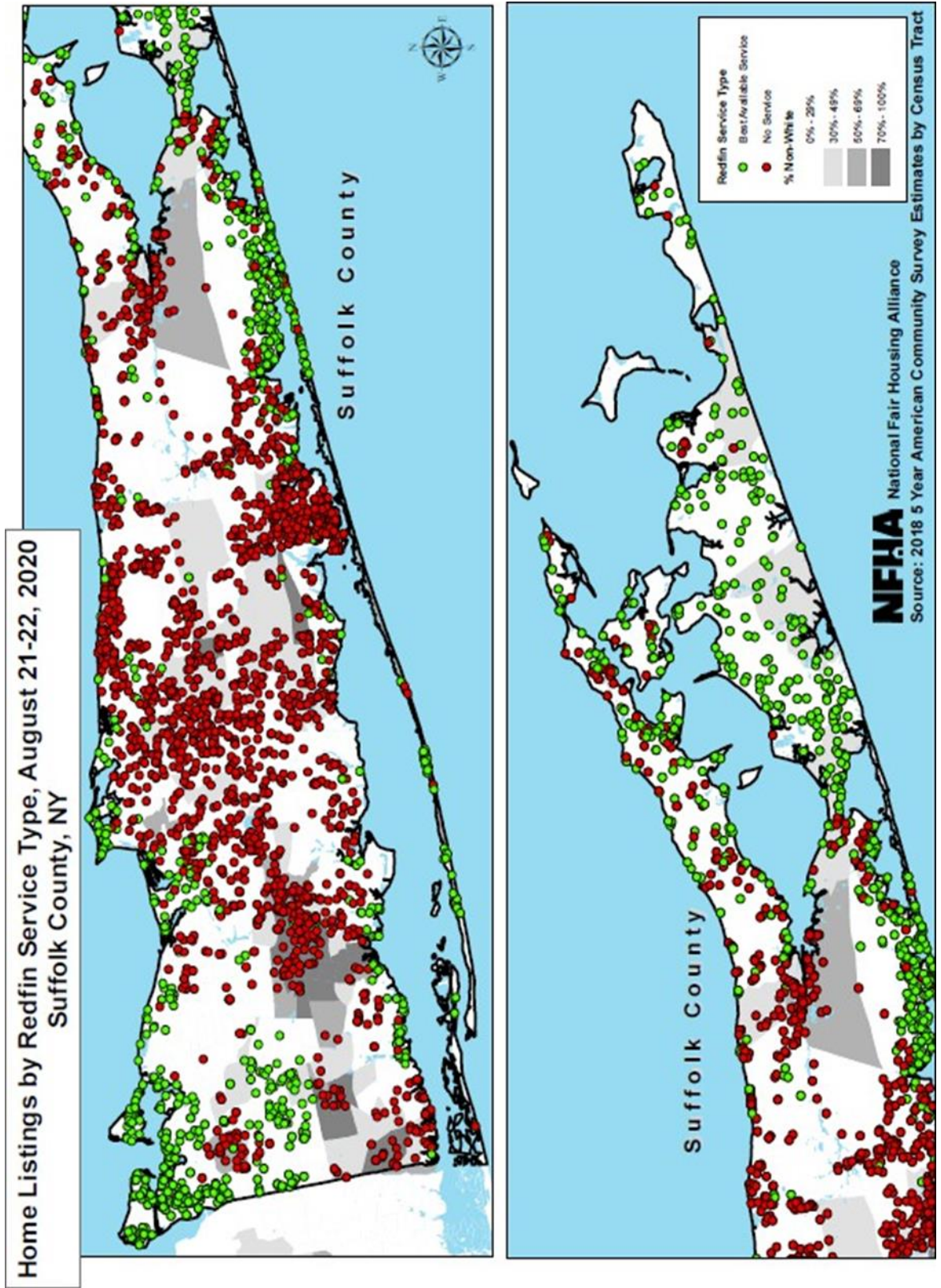
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MAP 10



MAP 11

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1 **H. City of Louisville (Jefferson County) - Kentucky**

2 198. Plaintiffs reviewed homes for sale posted on Redfin’s website from the City of
3 Louisville, which includes all of Jefferson County, Kentucky in November 2018 and June 2020.

4 199. Because of state laws applicable in Louisville, Redfin’s Best Available Service
5 does *not* allow buyers to receive the Redfin Refund.

6 **1. Louisville, Kentucky – November 21, 2018**

7 200. Plaintiffs reviewed and analyzed homes for sale in Louisville that were posted on
8 Redfin’s website on November 21, 2018.

9 **a. Best Available Service**

10 201. 108 homes were located within Extremely Non-White zip codes. Of those homes,
11 none was offered Redfin’s Best Available Service.

12 202. 2,337 homes were located within Extremely White zip codes. Of those homes,
13 1,419—or 60.72%—were offered Redfin’s Best Available Service.

14 203. Because Redfin did not offer its Best Available Service for any homes in
15 Extremely Non-White zip codes, the disparity ratio cannot be defined.

16 **b. No Service**

17 204. Of the 108 homes that were located within Extremely Non-White zip codes, 98—
18 or 90.74%—were “No Service” homes because they failed to meet the minimum price threshold
19 under Redfin’s Minimum Price Policy.

20 205. Of the 2,337 homes that were located within Extremely White zip codes, 352—or
21 15.06%—were “No Service” homes because they failed to meet the minimum price threshold
22 under Redfin’s Minimum Price Policy.

23 206. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
24 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
25 Service homes in Extremely White zip codes. The disparity ratio is 6.02.

26 207. Thus, on November 21, 2018, buyers and sellers of homes in Extremely Non-
27 White zip codes were 6.02 times more likely to be offered No Service by Redfin than buyers and

1 sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

2 208. This disparity is statistically significant to a 99.99% confidence rate. That is,
3 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

4 **2. Louisville, Kentucky – June 11, 2020**

5 209. Plaintiffs also reviewed and analyzed homes for sale in Louisville that were
6 posted on Redfin’s website on June 11, 2020.

7 **a. Best Available Service**

8 210. 31 homes were located within Extremely Non-White zip codes. Of those homes,
9 none was offered Redfin’s Best Available Service.

10 211. 1,451 homes were located within Extremely White zip codes. Of those homes,
11 964—or 66.44%—were offered Redfin’s Best Available Service.

12 212. Because Redfin did not offer its Best Available Service for any homes in
13 Extremely Non-White zip codes, the disparity ratio cannot be defined.

14 **b. No Service**

15 213. Of the 31 homes that were located within Extremely Non-White zip codes, 28—
16 or 90.32%—were “No Service” homes because they failed to meet the minimum price threshold
17 for the market under Redfin’s Minimum Price Policy.

18 214. Of the 1,451 homes that were located within Extremely White zip codes, 207—or
19 14.27%—were “No Service” homes because they failed to meet the minimum price threshold for
20 the market under Redfin’s Minimum Price Policy.

21 215. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
22 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
23 Service homes in Extremely White zip codes. The disparity ratio is 6.33.

24 216. Thus, on June 11, 2020, buyers and sellers of homes in Extremely Non-White zip
25 codes were 6.33 times more likely to be offered No Service by Redfin than buyers and sellers of
26 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

1 217. This disparity is statistically significant to a 99% confidence rate. That is, there is
2 less than a 1-in-100 chance that this disparity could be caused randomly.

3 **3. Map Showing the Stark Impact of Redfin’s Minimum Price Policy in**
4 **Louisville, Kentucky**

5 218. Below is a map showing the locations of homes for sale in the City of Louisville,
6 including Jefferson County, that were posted on Redfin’s website on June 11, 2020 for which
7 Redfin offered its Best Available Service and homes for which Redfin offered No Service. Map
8 12 shows the City of Louisville (Jefferson County).

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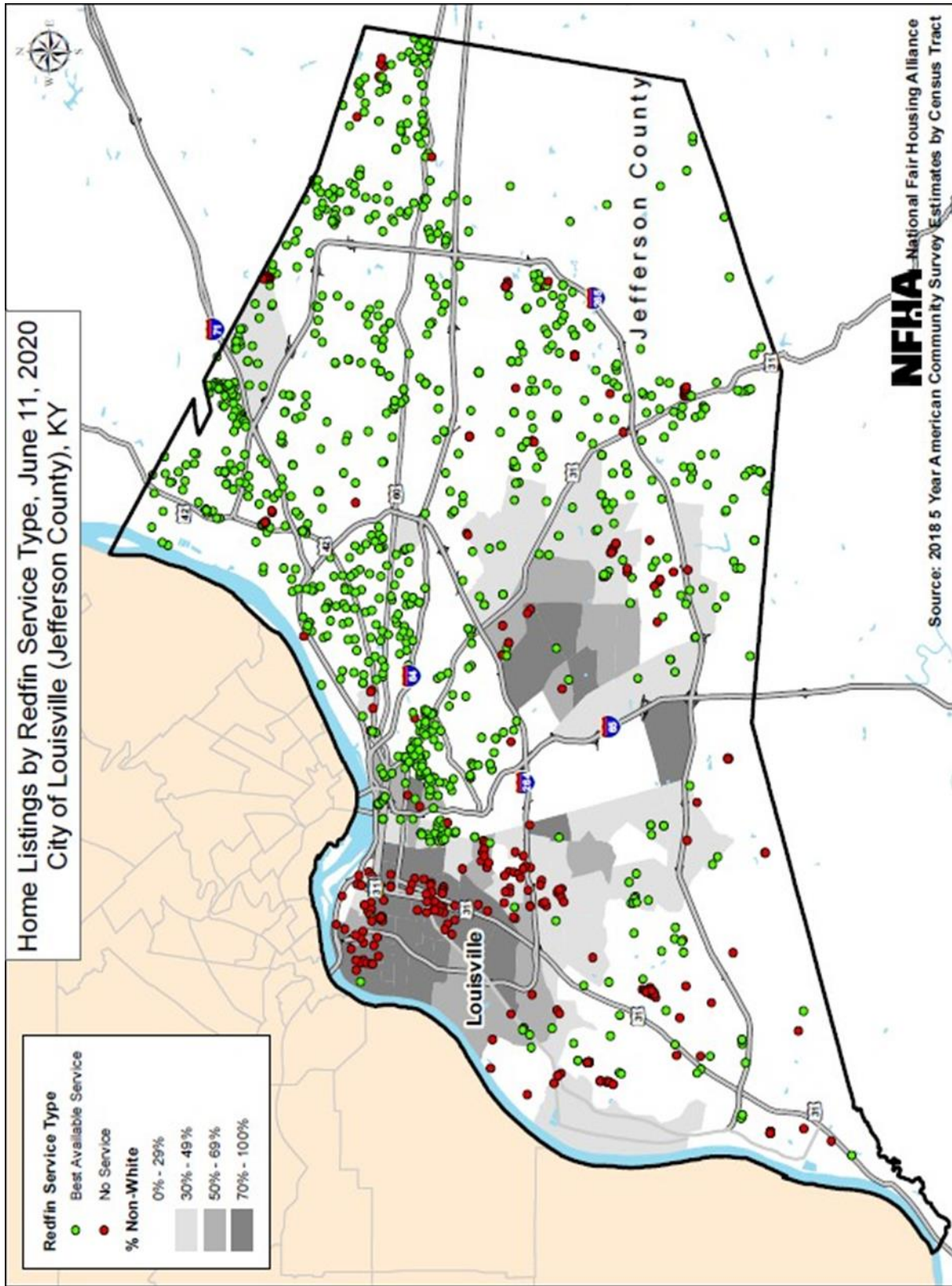
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MAP 12



1 **I. City of Memphis and Shelby County - Tennessee**

2 219. Plaintiffs reviewed homes for sale that were posted on Redfin’s website from the
3 City of Memphis and the county in which Memphis is located, Shelby County, Tennessee (the
4 “Memphis Metropolitan Area”) in October 2018, December 2018, March 2019, and June 2020.

5 220. Because of state laws applicable in the Memphis Metropolitan Area, Redfin’s
6 Best Available Service does *not* allow buyers to receive the Redfin Refund.

7 **1. Memphis Metropolitan Area – March 27, 2019**

8 221. Plaintiffs reviewed and analyzed the Memphis Metropolitan Area homes for sale
9 that were posted on Redfin’s website on March 27, 2019.

10 **a. Best Available Service**

11 222. 966 homes were located within Extremely Non-White zip codes. Of those homes,
12 39—or 4.04%—were offered Redfin’s Best Available Service.

13 223. 325 homes were located within Extremely White zip codes. Of those homes,
14 154—or 47.38%—were offered Redfin’s Best Available Service.

15 224. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
16 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
17 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 11.74.

18 225. Thus, on March 27, 2019, buyers and sellers of homes in Extremely White zip
19 codes were 11.74 times more likely to be offered Redfin’s Best Available Service than buyers
20 and sellers of homes in Extremely Non-White zip codes.

21 226. This disparity is statistically significant to a 99.9% confidence rate. That is, there
22 is less than a 1-in-1,000 chance that this disparity could be caused randomly.

23 **b. No Service**

24 227. Of the 966 homes that were located within Extremely Non-White zip codes,
25 780—or 80.75%—were “No Service” homes because they failed to meet the minimum price
26 threshold for the market under Redfin’s Minimum Price Policy.

1 228. Of the 325 homes that were located within Extremely White zip codes, 63—or
2 19.38%—were “No Service” homes because they failed to meet the minimum price threshold for
3 the market under Redfin’s Minimum Price Policy.

4 229. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
5 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
6 Service homes in Extremely White zip codes. The disparity ratio is 4.17.

7 230. Thus, on March 27, 2019, buyers and sellers of homes in Extremely Non-White
8 zip codes were 4.17 times more likely to be offered No Service by Redfin than buyers and sellers
9 of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

10 231. This disparity is statistically significant to a 99.99% confidence rate. That is,
11 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

12 **2. Memphis Metropolitan Area – June 20, 2020**

13 232. Plaintiffs also reviewed and analyzed the Memphis Metropolitan Area homes for
14 sale that were posted on Redfin’s website on June 20, 2020.

15 **a. Best Available Service**

16 233. 605 homes were located within Extremely Non-White zip codes. Of those homes,
17 10—or 1.65%—were offered Redfin’s Best Available Service.

18 234. 434 homes were located within Extremely White zip codes. Of those homes,
19 125—or 28.80%—were offered Redfin’s Best Available Service.

20 235. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
21 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
22 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 17.43.

23 236. Thus, on June 20, 2020, buyers and sellers of homes in Extremely White zip
24 codes were 17.43 times more likely to be offered Redfin’s Best Available Service than buyers
25 and sellers of homes in Extremely Non-White zip codes.

26 237. This disparity is statistically significant to a 99% confidence rate. That is, there is
27 less than a 1-in-100 chance that this disparity could be caused randomly.

1 **b. No Service**

2 238. Of the 605 homes that were located within Extremely Non-White zip codes,
3 451—or 74.55%—were “No Service” homes because they failed to meet the minimum price
4 threshold for the market under Redfin’s Minimum Price Policy.

5 239. Of the 434 homes that were located within Extremely White zip codes, 67—or
6 15.44%—were “No Service” homes because they failed to meet the minimum price threshold for
7 the market under Redfin’s Minimum Price Policy.

8 240. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
9 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
10 Service homes in Extremely White zip codes. The disparity ratio is 4.83.

11 241. Thus, on June 20, 2020, buyers and sellers of homes in Extremely Non-White zip
12 codes were 4.83 times more likely to be offered No Service by Redfin than buyers and sellers of
13 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

14 242. This disparity is statistically significant to a 99.99% confidence rate. That is,
15 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

16 **3. Memphis Metropolitan Area – Other Dates**

17 243. Plaintiffs also reviewed and analyzed the Memphis Metropolitan Area homes for
18 sale that were posted on Redfin’s website on October 4, 2018, and December 6, 2018.

19 244. On each of these dates, buyers and sellers of homes in Extremely White zip codes
20 were far more likely to be offered Redfin’s Best Available Service than buyers and sellers of
21 homes in Extremely Non-White zip codes. On each date, the disparity was statistically
22 significant.

23 245. Also, on each of these dates, buyers and sellers of homes in Extremely Non-White
24 zip codes were far more likely to be offered No Service by Redfin than buyers and sellers of
25 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy. On each date,
26 the disparity was statistically significant.

27

1 **4. Map Showing the Stark Impact of Redfin’s Minimum Price Policy in the**
2 **Memphis Metropolitan Area**

3 246. Below is a map showing the locations of Memphis Metropolitan Area homes for
4 sale that were posted on Redfin’s website on March 27, 2019 for which Redfin offered its Best
5 Available Service and homes for which Redfin offered No Service. Map 13 shows Shelby
6 County, including the City of Memphis.

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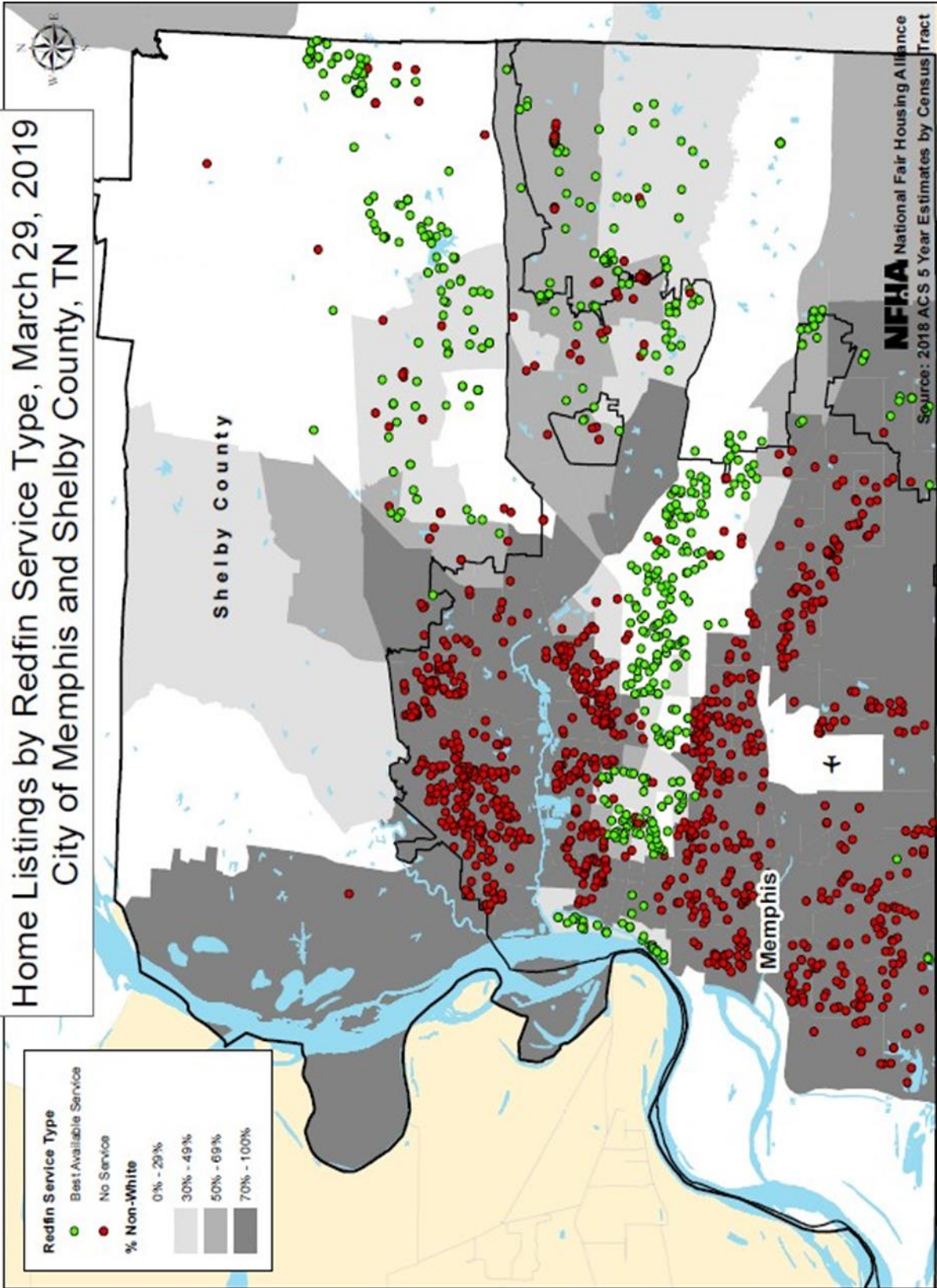
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MAP 13



1 **J. Milwaukee Metropolitan Area - Wisconsin**

2 247. Plaintiffs reviewed homes for sale that were posted on Redfin’s website from the
3 Milwaukee metropolitan area in December 2018 and June 2020.

4 248. Plaintiffs’ review encompassed homes in Milwaukee County, where the City of
5 Milwaukee is located, and Waukesha County, to the west of Milwaukee County (the “Milwaukee
6 Metropolitan Area”).

7 249. In December 2018, Redfin’s Best Available Service in the Milwaukee
8 Metropolitan Area allowed buyers to receive the Redfin Refund, so long as it was available
9 under the Refund Minimum Policy.

10 250. In June 2020, because of a change in state law, Redfin’s Best Available Service in
11 the Milwaukee Metropolitan Area did *not* allow buyers to receive the Redfin Refund.

12 **1. Milwaukee Metropolitan Area – December 20, 2018**

13 251. Plaintiffs reviewed and analyzed the Milwaukee Metropolitan Area homes for
14 sale that were posted on Redfin’s website on December 20, 2018.

15 **a. Best Available Service**

16 252. 669 homes were located within Extremely Non-White zip codes. Of those homes,
17 27—or 4.04%—were offered Redfin’s Best Available Service.

18 253. 2,758 homes were located within Extremely White zip codes. Of those homes,
19 1,428—or 51.78%—were offered Redfin’s Best Available Service.

20 254. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
21 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
22 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 12.83.

23 255. Thus, on December 20, 2018, buyers and sellers of homes in Extremely White zip
24 codes were 12.83 times more likely to be offered Redfin’s Best Available Service than buyers
25 and sellers of homes in Extremely Non-White zip codes.

26 256. This disparity is statistically significant to a 99.99% confidence rate. That is,
27 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

1 **b. No Service**

2 257. Of the 669 homes that were located within Extremely Non-White zip codes,
3 566—or 84.60%—were “No Service” homes because they failed to meet the minimum price
4 threshold for the market under Redfin’s Minimum Price Policy.

5 258. Of the 2,758 homes that were located within Extremely White zip codes, 251—or
6 9.10%—were “No Service” homes because they failed to meet the minimum price threshold for
7 the market under Redfin’s Minimum Price Policy.

8 259. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
9 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
10 Service homes in Extremely White zip codes. The disparity ratio is 9.30.

11 260. Thus, on December 20, 2018, buyers and sellers of homes in Extremely Non-
12 White zip codes were 9.30 times more likely to be offered No Service by Redfin than buyers and
13 sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

14 261. This disparity is statistically significant to a 99.99% confidence rate. That is,
15 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

16 **2. Milwaukee Metropolitan Area – June 20, 2020**

17 262. Plaintiffs also reviewed and analyzed the Milwaukee Metropolitan Area homes
18 for sale that were posted on Redfin’s website on June 20, 2020.

19 **a. Best Available Service**

20 263. 454 homes were located within Extremely Non-White zip codes. Of those homes
21 none was offered Redfin’s Best Available Service.

22 264. 2,094 homes were located within Extremely White zip codes. Of those homes,
23 779—or 37.20%—were offered Redfin’s Best Available Service.

24 265. Because Redfin did not offer its Best Available Service for any homes in
25 Extremely Non-White zip codes, the disparity ratio cannot be defined.

b. No Service

266. Of the 454 homes that were located within Extremely Non-White zip codes, 427—or 94.05%—were “No Service” homes because they failed to meet the minimum price threshold for the market under Redfin’s Minimum Price Policy.

267. Of the 2,094 homes that were located within Extremely White zip codes, 768—or 36.68%—were “No Service” homes because they failed to meet the minimum price threshold for the market under Redfin’s Minimum Price Policy.

268. Based on this data, Plaintiffs calculated a disparity ratio by dividing the percentage of No Service homes in Extremely Non-White zip codes by the percentage of No Service homes in Extremely White zip codes. The disparity ratio is 2.56.

269. Thus, on June 20, 2020, buyers and sellers of homes in Extremely Non-White zip codes were 2.56 times more likely to be offered No Service by Redfin than buyers and sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

270. This disparity is statistically significant to a 99.99% confidence rate. That is, there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

3. Maps Showing the Stark Impact of Redfin’s Minimum Price Policy in the Milwaukee Metropolitan Area

271. Below is a map showing the locations of Milwaukee Metropolitan Area homes for sale that were posted on Redfin’s website on June 20, 2020 for which Redfin offered its Best Available Service and homes for which Redfin offered No Service. Map 14 shows Milwaukee County and Waukesha County, Wisconsin.

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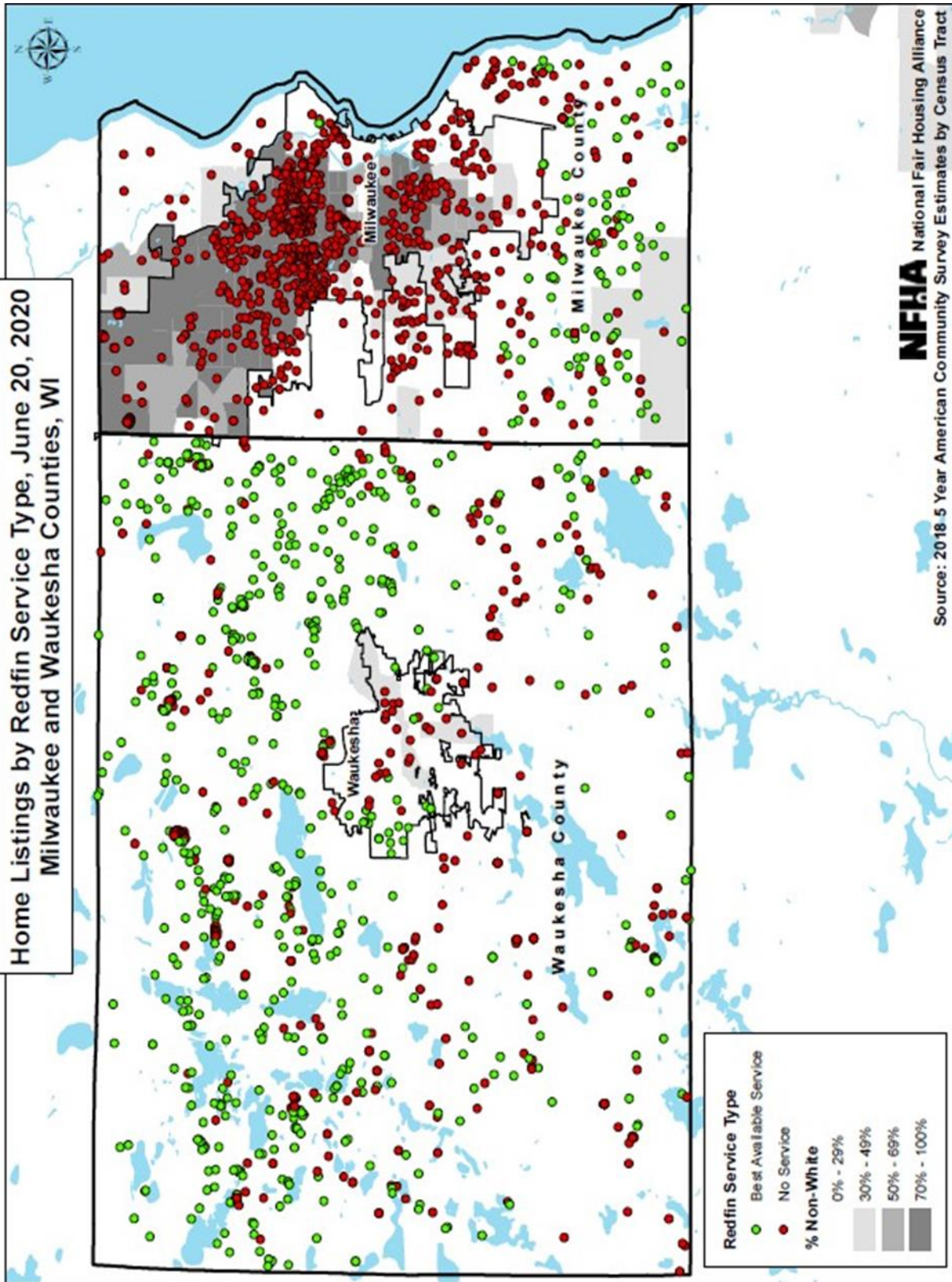
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MAP 14



1 **K. Newark Metropolitan Area - New Jersey**

2 272. Plaintiffs reviewed homes for sale that were posted on Redfin’s website from the
3 Newark metropolitan area in December 2018 and June 2020.

4 273. Plaintiffs’ review encompassed homes in Essex County, where the City of
5 Newark is located, Bergen County, Passaic County, and Union County (the “Newark
6 Metropolitan Area”).

7 274. In the Newark Metropolitan Area, Redfin’s Best Available Service allows buyers
8 to receive the Redfin Refund, so long as it is available under the Refund Minimum Policy.

9 **1. Newark Metropolitan Area – December 18-19, 2018**

10 275. Plaintiffs reviewed and analyzed the Newark Metropolitan Area homes for sale
11 that were posted on Redfin’s website on December 18-19, 2018.

12 **a. Best Available Service**

13 276. 2,565 homes were located within Extremely Non-White zip codes. Of those
14 homes, 601—or 23.43%—were offered Redfin’s Best Available Service.

15 277. 3,545 homes were located within Extremely White zip codes. Of those homes,
16 2,794—or 78.82%—were offered Redfin’s Best Available Service.

17 278. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
18 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
19 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 3.36.

20 279. Thus, on December 18-19, 2018, buyers and sellers of homes in Extremely White
21 zip codes were 3.36 times more likely to be offered Redfin’s Best Available Service than buyers
22 and sellers of homes in Extremely Non-White zip codes.

23 280. This disparity is statistically significant to a 99.99% confidence rate. That is,
24 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

25 **b. No Service**

26 281. Of the 2,565 homes that were located within Extremely Non-White zip codes,
27 1,010—or 39.38%—were “No Service” homes because they failed to meet the minimum price

1 threshold for the market under Redfin’s Minimum Price Policy.

2 282. Of the 3,545 homes that were located within Extremely White zip codes, 160—or
3 4.51%—were “No Service” homes because they failed to meet the minimum price threshold for
4 the market under Redfin’s Minimum Price Policy.

5 283. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
6 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
7 Service homes in Extremely White zip codes. The disparity ratio is 8.72.

8 284. Thus, on December 18-19, 2018, buyers and sellers of homes in Extremely Non-
9 White zip codes were 8.72 times more likely to be offered No Service by Redfin than buyers and
10 sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

11 285. This disparity is statistically significant to a 99.99% confidence rate. That is,
12 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

13 **2. Newark Metropolitan Area – June 12, 2020**

14 286. Plaintiffs also reviewed and analyzed the Newark Metropolitan Area homes for
15 sale that were posted on Redfin’s website on June 12, 2020.

16 **a. Best Available Service**

17 287. 1,464 homes were located within Extremely Non-White zip codes. Of those
18 homes, 143—or 9.77%—were offered Redfin’s Best Available Service.

19 288. 2,452 homes were located within Extremely White zip codes. Of those homes,
20 1,295—or 52.81%—were offered Redfin’s Best Available Service.

21 289. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
22 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
23 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 5.41.

24 290. Thus, on June 12, 2020, buyers and sellers of homes in Extremely White zip
25 codes were 5.41 times more likely to be offered Redfin’s Best Available Service than buyers and
26 sellers of homes in Extremely Non-White zip codes.

1 291. This disparity is statistically significant to a 99.99% confidence rate. That is,
2 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

3 **b. No Service**

4 292. Of the 1,464 homes that were located within Extremely Non-White zip codes,
5 717—or 48.98%—were “No Service” homes because they failed to meet the minimum price
6 threshold for the market under Redfin’s Minimum Price Policy.

7 293. Of the 2,452 homes that were located within Extremely White zip codes, 276—or
8 11.26%—were “No Service” homes because they failed to meet the minimum price threshold for
9 the market under Redfin’s Minimum Price Policy.

10 294. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
11 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
12 Service homes in Extremely White zip codes. The disparity ratio is 4.35.

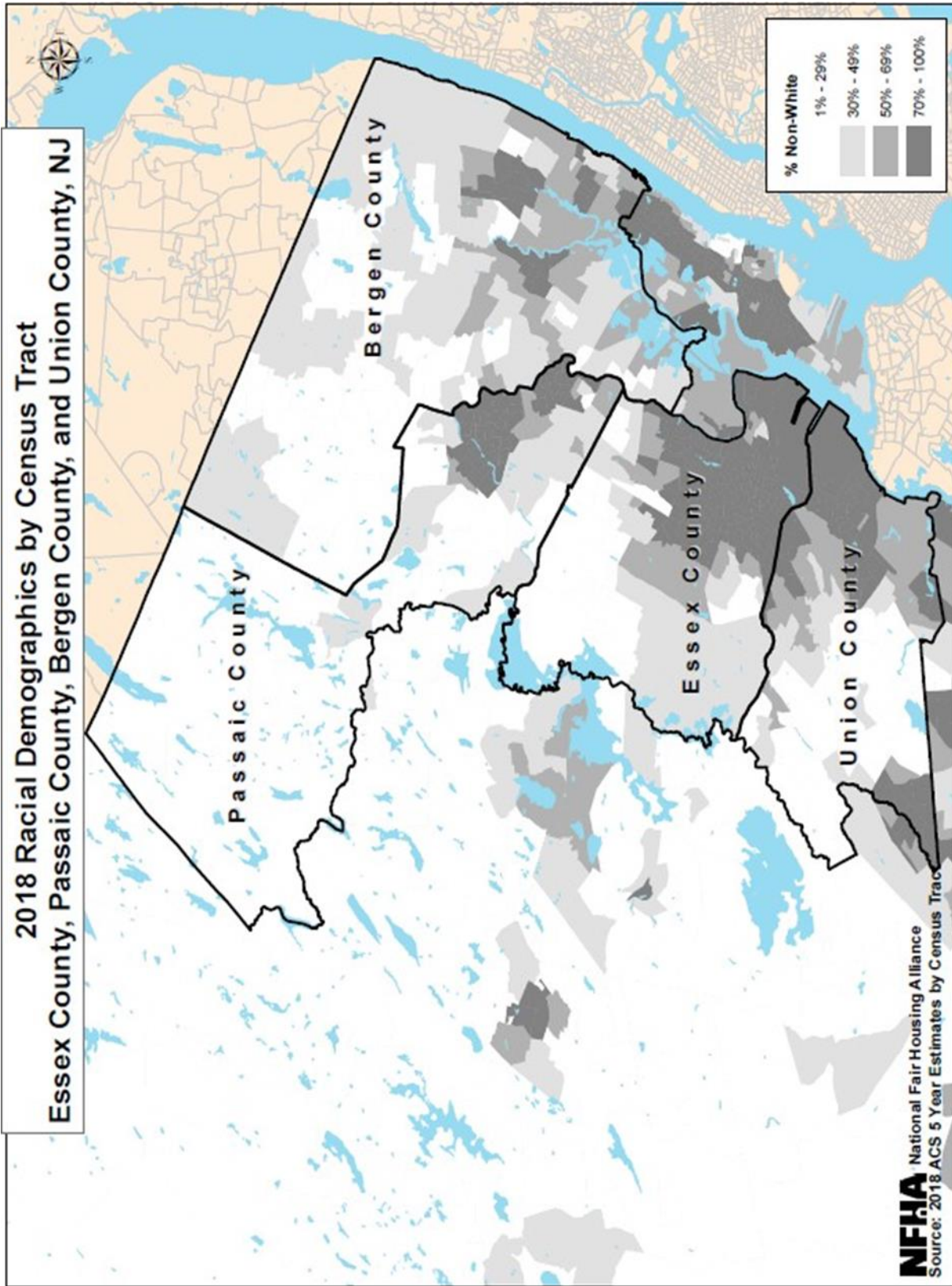
13 295. Thus, on June 12, 2020, buyers and sellers of homes in Extremely Non-White zip
14 codes were 4.35 times more likely to be offered No Service by Redfin than buyers and sellers of
15 homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

16 296. This disparity is statistically significant to a 99.99% confidence rate. That is,
17 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

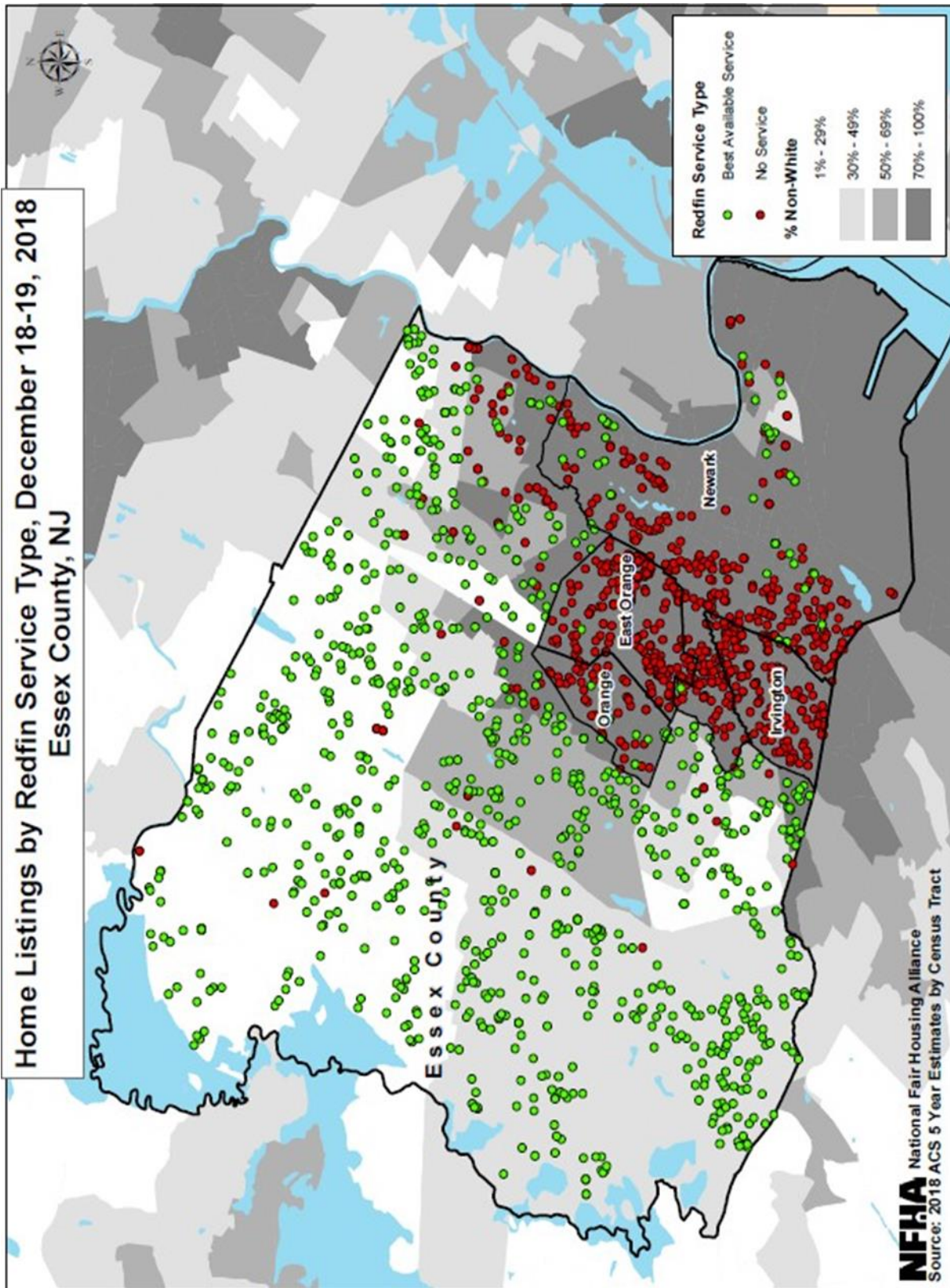
18 **3. Maps Showing the Stark Impact of Redfin’s Minimum Price Policy in the**
19 **Newark Metropolitan Area**

20 297. Below are maps showing the locations of Newark Metropolitan Area homes for
21 sale that were posted on Redfin’s website on December 18-19, 2018 for which Redfin offered its
22 Best Available Service and homes for which Redfin offered No Service. Map 15 shows the
23 racial composition of the four counties that comprise the Newark Metropolitan Area studied by
24 Plaintiffs. Map 16 shows Essex County, which includes the City of Newark; Map 17 shows
25 Union County; Map 18 shows Bergen County; and Map 19 shows Passaic County by Redfin’s
26 type of service: Best Available Service or No Service.

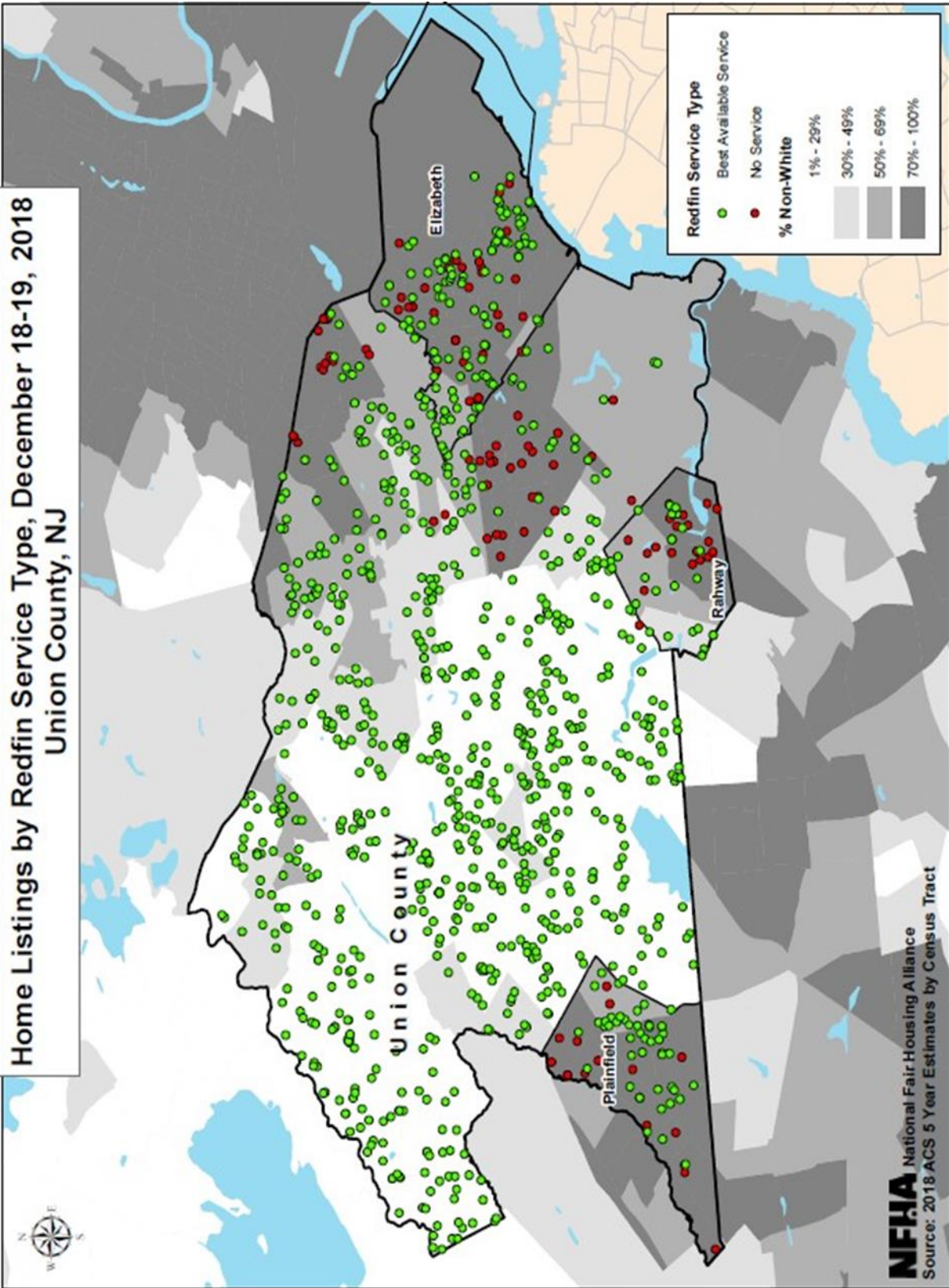
MAP 15



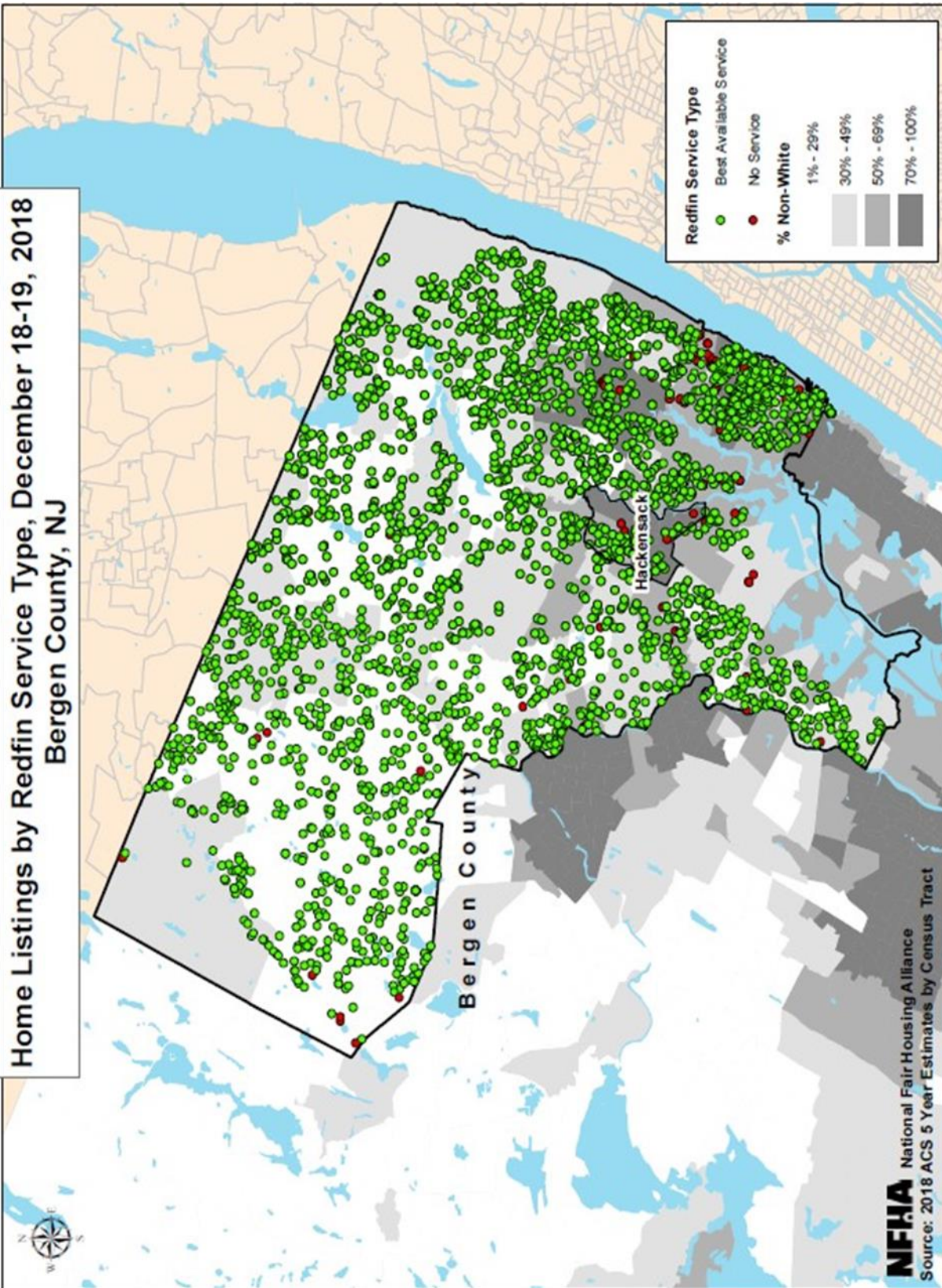
MAP 16



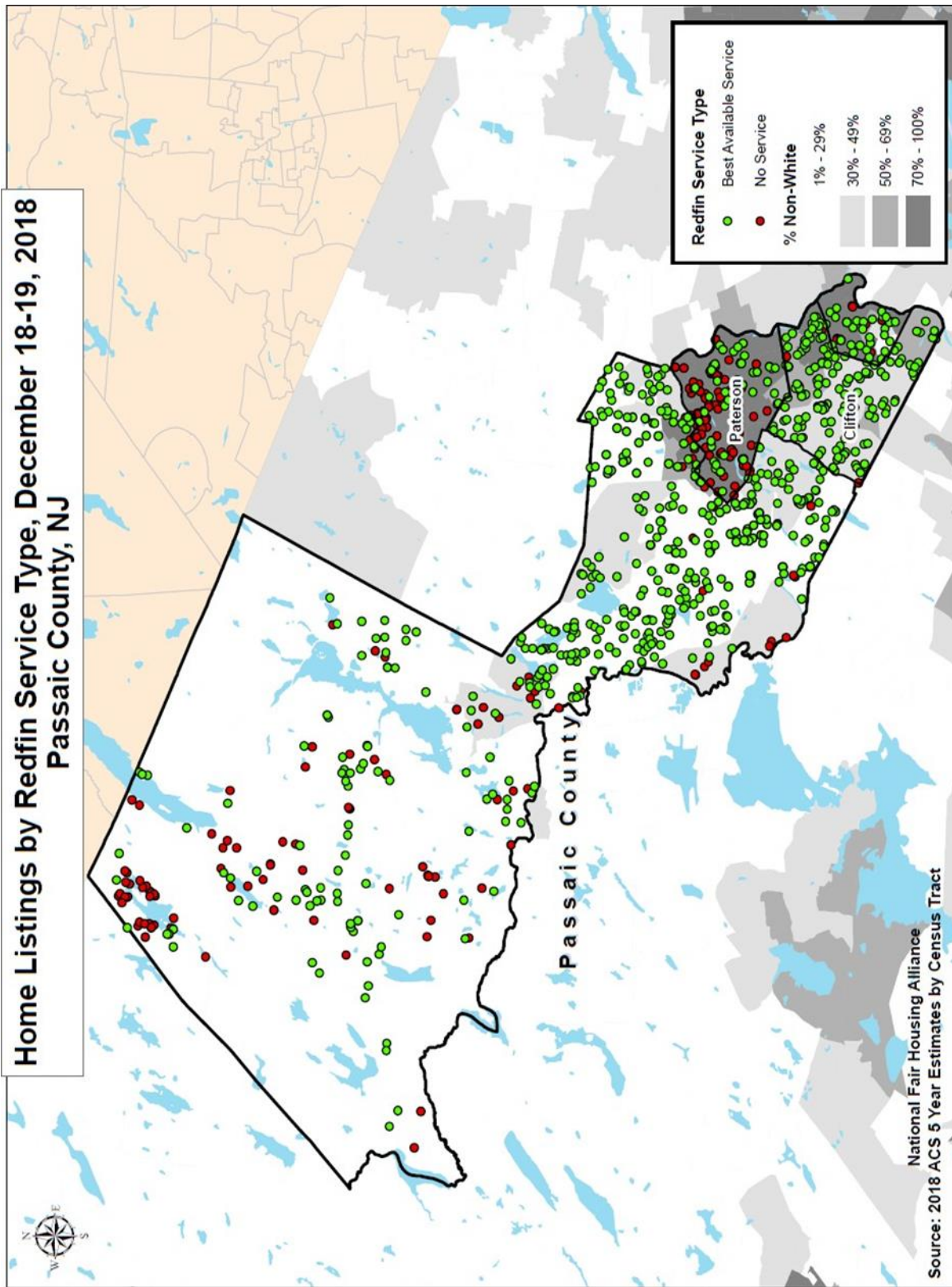
MAP 17



MAP 18



MAP 19



1 **L. City of Philadelphia and Delaware County - Pennsylvania**

2 298. Plaintiffs reviewed homes for sale that were posted on Redfin’s website from the
3 City of Philadelphia (Philadelphia County) and Delaware County, Pennsylvania (for purposes of
4 this Complaint, the “Philadelphia Metropolitan Area”) in November 2018 and June 2020.

5 Delaware County is adjacent to and located southwest of the City of Philadelphia.

6 299. Because of state laws applicable in the Philadelphia Metropolitan Area, Redfin’s
7 Best Available Service does *not* allow buyers to receive the Redfin Refund.

8 **1. Philadelphia Metropolitan Area – November 8, 2018**

9 300. Plaintiffs reviewed and analyzed the Philadelphia Metropolitan Area homes for
10 sale that were posted on Redfin’s website on November 8, 2018.

11 **a. Best Available Service**

12 301. 3,180 homes were located within Extremely Non-White zip codes. Of those
13 homes, 386—or 12.14%—were offered Redfin’s Best Available Service.

14 302. 2,869 homes were located within Extremely White zip codes. Of those homes,
15 1,977—or 68.91%—were offered Redfin’s Best Available Service.

16 303. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
17 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
18 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 5.68.

19 304. Thus, on November 8, 2018, buyers and sellers of homes in Extremely White zip
20 codes were 5.68 times more likely to be offered Redfin’s Best Available Service than buyers and
21 sellers of homes in Extremely Non-White zip codes.

22 305. This disparity is statistically significant to a 99.99% confidence rate. That is,
23 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

24 **b. No Service**

25 306. Of the 3,180 homes that were located within Extremely Non-White zip codes,
26 1,830—or 57.55%—were “No Service” homes because they failed to meet the minimum price
27 threshold for the market under Redfin’s Minimum Price Policy.

1 307. Of the 2,869 homes that were located within Extremely White zip codes, 154—or
2 5.37%—were “No Service” homes because they failed to meet the minimum price threshold for
3 the market under Redfin’s Minimum Price Policy.

4 308. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
5 percentage of No Service homes in Extremely Non-White zip codes by the percentage of No
6 Service homes in Extremely White zip codes. The disparity ratio is 10.72.

7 309. Thus, on November 8, 2018, buyers and sellers of homes in Extremely Non-
8 White zip codes were 10.72 times more likely to be offered No Service by Redfin than buyers
9 and sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

10 310. This disparity is statistically significant to a 99.99% confidence rate. That is,
11 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

12 **2. Philadelphia Metropolitan Area – June 25, 2020**

13 311. Plaintiffs also reviewed and analyzed the Philadelphia Metropolitan Area homes
14 for sale that were posted on Redfin’s website on June 25, 2020.

15 **a. Best Available Service**

16 312. 2,020 homes were located within Extremely Non-White zip codes. Of those
17 homes, 415—or 20.54%—were offered Redfin’s Best Available Service.

18 313. 2,043 homes were located within Extremely White zip codes. Of those homes,
19 1,333—or 65.25%—were offered Redfin’s Best Available Service.

20 314. Based on this data, Plaintiffs calculated a disparity ratio by dividing the
21 percentage of Best Available Service homes in Extremely White zip codes by the percentage of
22 Best Available Service homes in Extremely Non-White zip codes. The disparity ratio is 3.18.

23 315. Thus, on June 25, 2020, buyers and sellers of homes in Extremely White zip
24 codes were 3.18 times more likely to be offered Redfin’s Best Available Service than buyers and
25 sellers of homes in Extremely Non-White zip codes.

26 316. This disparity is statistically significant to a 99.99% confidence rate. That is,
27 there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

b. No Service

317. Of the 2,020 homes that were located within Extremely Non-White zip codes, 1,290—or 63.86%—were “No Service” homes because they failed to meet the minimum price threshold for the market under Redfin’s Minimum Price Policy.

318. Of the 2,043 homes that were located within Extremely White zip codes, 253—or 12.38%—were “No Service” homes because they failed to meet the minimum price threshold for the market under Redfin’s Minimum Price Policy.

319. Based on this data, Plaintiffs calculated a disparity ratio by dividing the percentage of No Service homes in Extremely Non-White zip codes by the percentage of No Service homes in Extremely White zip codes. The disparity ratio is 5.16.

320. Thus, on June 25, 2020, buyers and sellers of homes in Extremely Non-White zip codes were 5.16 times more likely to be offered No Service by Redfin than buyers and sellers of homes in Extremely White zip codes because of Redfin’s Minimum Price Policy.

321. This disparity is statistically significant to a 99.99% confidence rate. That is, there is less than a 1-in-10,000 chance that this disparity could be caused randomly.

3. Maps Showing the Stark Impact of Redfin’s Minimum Price Policy in the Philadelphia Metropolitan Area

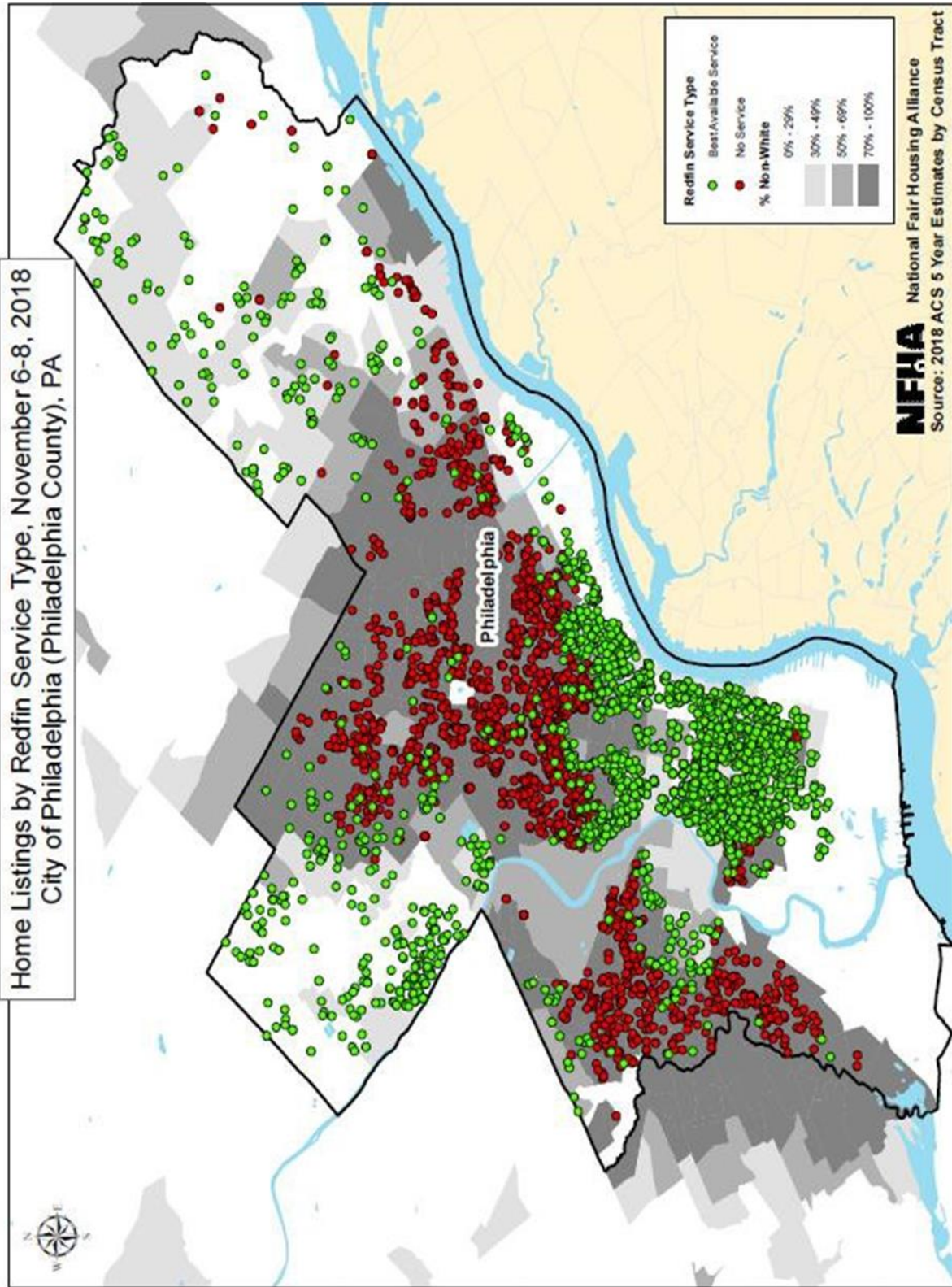
322. Below are maps for the Philadelphia Metropolitan area. Map 20 shows the racial composition of the City of Philadelphia (Philadelphia County) and Delaware County. Maps 21, 22 and 23 show the location of homes for sale that were posted on Redfin’s website on November 8, 2018 for which Redfin offered its Best Available Service and homes for which Redfin offered No Service. Map 21 shows the City of Philadelphia (Philadelphia County); Map 22 shows the central area of the City of Philadelphia; and Map 23 shows Delaware County.

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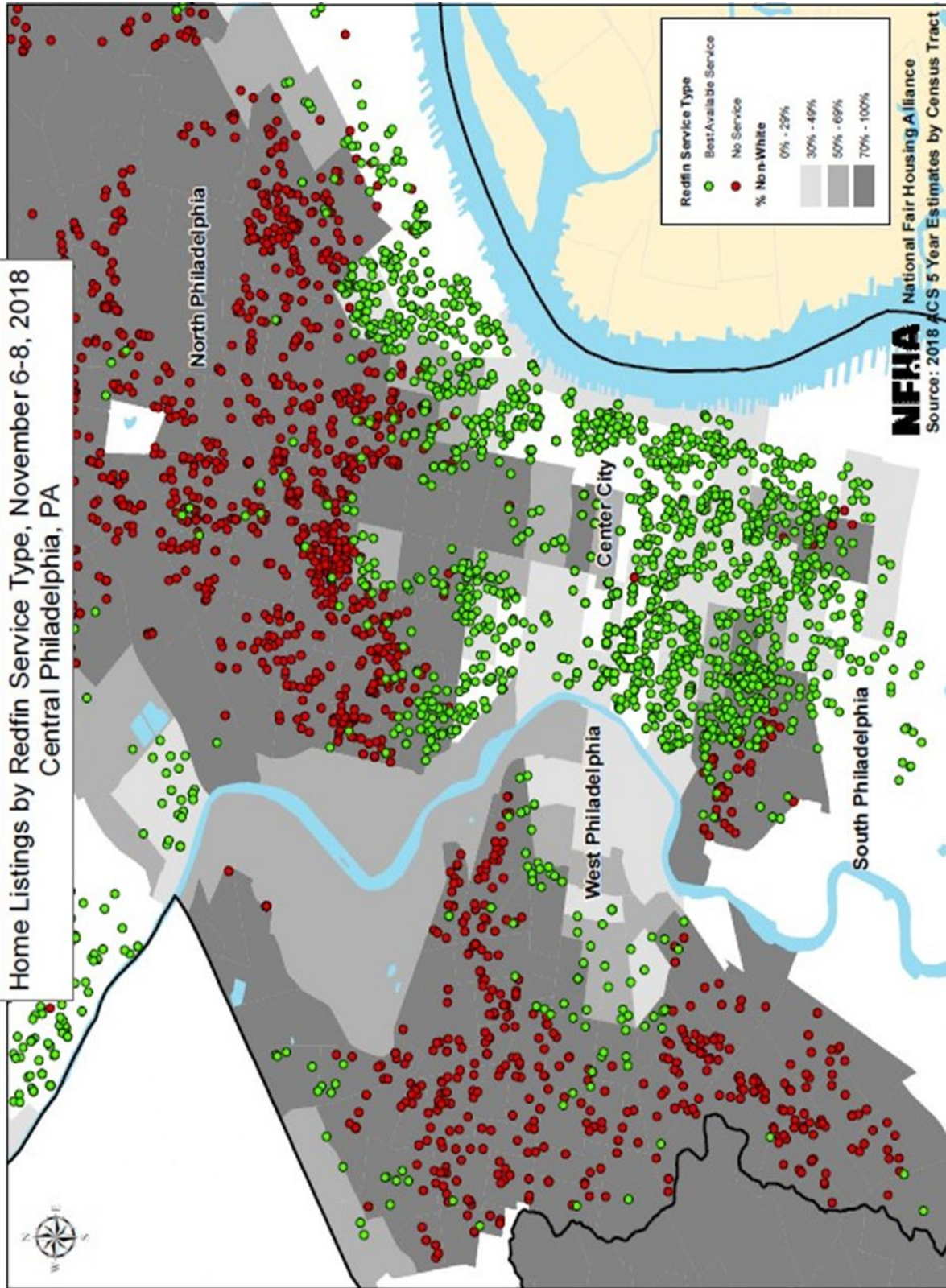
MAP 20



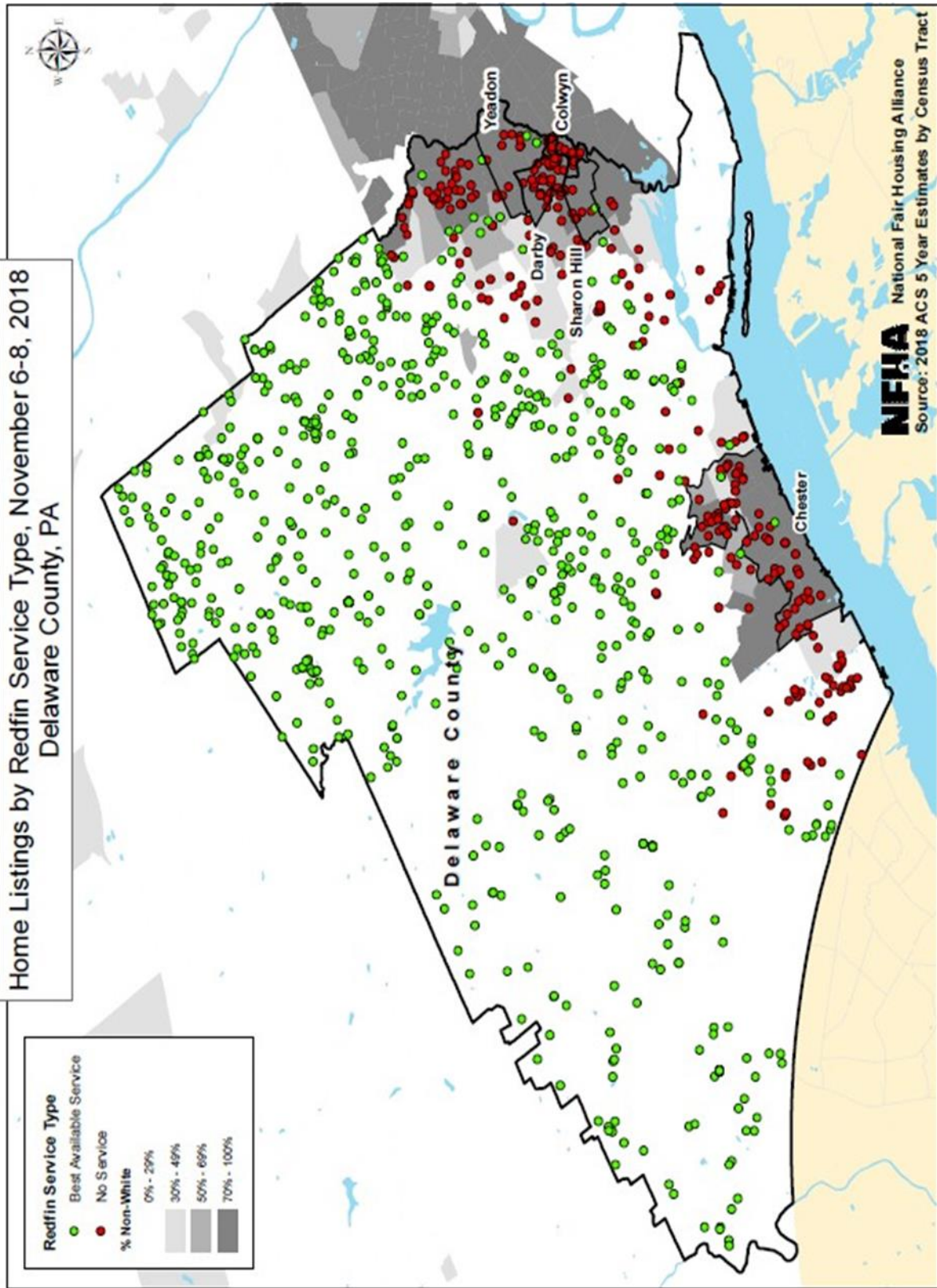
MAP 21



MAP 22



MAP 23



V. INJURY CAUSED BY REDFIN

1
2 323. Redfin’s policies and practices described in this Complaint illegally reinforce dual
3 and discriminatory housing markets in the ten metropolitan areas described above by denying
4 brokerage services because of the racial composition of a neighborhood.

5 324. On information and belief, Redfin’s centralized Minimum Price Policy and
6 practices described above are applied in other similar housing markets throughout the United
7 States, causing the same patterns of redlining and segregation as described in this Complaint.

8 325. Redfin’s policies and practices redline communities of color by operating as
9 discriminatory strangleholds on housing in the very communities that have been battered by over
10 a century of residential segregation, systemic racism, and disinvestment. Redfin
11 disproportionately withholds service to homebuyers and sellers in these communities,
12 disincentivizing homebuying, reducing housing demand and values, and perpetuating a dual and
13 racially discriminatory housing market.

14 326. In contrast, Redfin’s policies and practices financially incentivize homebuying
15 and increase demand in select white communities, areas where the housing market is often less in
16 need of the type of artificial stimulation of demand Redfin offers.

17 327. Redfin’s policies and practices amount to separate and unequal treatment of
18 communities based on the racial composition of the area. In short, Redfin’s policies and
19 practices constitute real estate redlining in a digital age.

20 328. By limiting the services and financial incentives it offers for homebuyers and
21 sellers, Redfin denotes that a home is located in an undesirable neighborhood. By labeling an
22 area as “No Service,” Redfin is sending the message that there is something undesirable about
23 the home for sale or the neighborhood in which it is located. Indicating that the property will not
24 receive service due to the “area” in which the property is located underscores the negative
25 connotation of the neighborhood and the home. Redfin’s practices also signal to people who are
26 not familiar with the area in which the home is located that since the home is in an undesirable
27 location, its value may not appreciate – thus amplifying the perceived undesirability of the area.

1 329. Real estate redlining negatively impacts property values in a number of ways,
2 including by impacting the average Days on Market (DOM) for a home or area. For example,
3 reducing real estate marketing services offered to sell a home can lower the number of options to
4 sell a home and extend the average DOM, making the home and area look less desirable and,
5 consequently, lowering property values.

6 330. Real estate redlining also negatively impacts the demand for housing in a
7 particular area. If fewer people have opportunities to see a home, demand for that property will
8 diminish. Conversely, when a property receives more exposure, more people have an
9 opportunity to view the home and the demand for the property increases.

10 331. Real estate redlining perpetuates segregation by severely restricting the number of
11 people who will see a property or be made aware of the property's availability. It restricts the
12 ability of people who do not live in an area where the property is located to view the property.

13 332. Continued residential segregation creates a self-sustaining cycle of inequality.
14 Where people live matters. It impacts their lives – their access to transportation, quality
15 education, employment opportunities, quality credit, clean water, healthy food, and good health
16 care. Segregation contributes to the racial wealth gap between white and non-white households
17 and to the racialization of poverty.

18 333. Plaintiffs are “aggrieved persons” as defined by the Fair Housing Act, 42 U.S.C.
19 § 3602(i), and have been injured as a direct and proximate result of Defendant's unlawful
20 discriminatory conduct.

21 334. Plaintiffs have diverted time and resources to identify and counteract Redfin's
22 discriminatory policies and practices described in this Complaint, resulting in the expenditure of
23 time and resources that would otherwise have been used by Plaintiffs to engage in their regular
24 and typical activities to further their fair housing missions.

25 335. NFHA was forced to divert resources and time away from other intended projects
26 and programs, and to delay, suspend, or even cancel such programming. Redfin's discriminatory
27 conduct caused NFHA to forego opportunities, including executing new fair housing advocacy

1 projects or investigations, conducting educational activities and fair housing training, applying
2 for new grants and funding sources, and providing professional staff development.

3 336. NFHA staff has spent many hours since 2018 examining information contained
4 on Redfin's website about homes available for sale in various metropolitan areas at different
5 points in time.

6 337. NFHA has expended staff time and resources to collect, organize, and analyze
7 information about Redfin's policies and practices.

8 338. NFHA staff also developed an investigative plan for the other Plaintiffs to collect
9 information and study the impact of Redfin's policies and practices in each group's service area.

10 339. Starting in 2020, each Plaintiff, other than NFHA, spent staff time and resources
11 to investigate Redfin's policies and practices in each Plaintiff's service area. Each Plaintiff
12 performed some or all of the following activities: auditing Redfin's service price points;
13 obtaining a sample of home listings showing Redfin's various types of service; developing
14 spreadsheets of homes for sale posted on Redfin's website; developing spreadsheets showing
15 historical data of properties where Redfin acted as the buyer's agent or listing agent; researching
16 information about Redfin's offices and agents; and researching real estate commissions generally
17 in the area.

18 340. Redfin's discrimination has further frustrated each Plaintiff's mission of ending
19 unlawful housing discrimination and residential segregation.

20 341. Each Plaintiff has expended staff time and resources to undertake activities to
21 counteract the negative effects of Redfin's policies and practices in each metropolitan area
22 described in this Complaint, including (a) conducting education and outreach efforts on social
23 media platforms to inform the public and real estate industry about how minimum price policies
24 can harm communities of color; and (b) providing educational information about unequal
25 brokerage services to advocacy and other groups serving communities most likely to be
26 adversely impacted by Redfin's policies.

27

1 342. Redfin’s discrimination will require Plaintiffs to undertake significant future
2 measures to counteract the continuing harm caused by Redfin.

3 343. Redfin’s conduct as described in this Complaint was intentional, willful, or made
4 with reckless disregard of the rights of others.

5 **VI. FAIR HOUSING ACT CAUSES OF ACTION**

6 **First Claim for Relief**
7 **Fair Housing Act – Discrimination in Provision of Brokerage Services**
8 (42 U.S.C. § 3606)

9 344. Plaintiffs restate and incorporate by reference the preceding paragraphs above as
10 if fully set forth herein.

11 345. The homes that Redfin posts on its website as available for sale are “dwellings” as
12 defined by the Fair Housing Act, 42 U.S.C. § 3602(b).

13 346. By offering to enter into listing contracts with homeowners to provide services for
14 the sale of homes and/or to enter into agreements to represent buyers during the process of
15 searching for and buying a home, Redfin provides a “service . . . relating to the business of
16 selling or renting dwellings” within the meaning of 42 U.S.C. § 3606.

17 347. Redfin’s policies and practices as described above illegally discriminated against,
18 and continue to discriminate against, Plaintiffs by “deny[ing] any person access to . . . [Redfin’s]
19 service...relating to the business of selling or renting dwellings, [and] discriminat[ing] against
20 [such persons] in the terms or conditions of such access...or participation, because of race and/or
21 national origin.” 42 U.S.C. § 3606.

22 348. By establishing geographic boundaries for access to its real estate services based
23 on the race and/or national origin of a geographic area’s residents, Redfin denies access to its
24 services in violation of 24 C.F.R. § 100.90(b)(4).

25 349. By not offering its real estate services to certain areas because of the race and/or
26 national origin of the residents of those areas, Redfin makes its services unavailable and
27 discriminates in the performance of such services in violation of 24 C.F.R. § 100.135(a).

- 1 (ii) Train all Defendant's current and future employees and agents with
2 responsibilities related to the design, implementation, and operation of
3 Defendant's real estate services on fair housing laws;
- 4 (iii) Require monitoring of Defendant's digital platform and its policies and
5 practices for a sufficient period of time to ensure future compliance with
6 fair housing laws; and
- 7 (iv) Retain records to allow for appropriate compliance monitoring by
8 Plaintiffs;
- 9 (d) Awarding such damages to Plaintiffs as will fully compensate them for the
10 diversion of resources and frustration of mission caused by Defendant's unlawful
11 policies and practices;
- 12 (e) Awarding punitive damages to Plaintiffs;
- 13 (f) Awarding Plaintiffs reasonable attorneys' fees, costs, and expenses incurred in
14 prosecuting this action; and
- 15 (g) Granting Plaintiffs such other and further relief as may be just and proper.

16 DATED this 28th day of October, 2020

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