

**HOUSING DISCRIMINATION COMPLAINT**

**CASE NUMBER:**

**1. Complainants**

National Fair Housing Alliance  
1331 Pennsylvania Avenue NW, Suite 650  
Washington, D.C. 20004  
(202) 898-1661

Representing Complainant:

Morgan Williams, Esq.  
Scott Chang, Esq.  
National Fair Housing Alliance  
Washington, D.C. 20004  
(202) 898-1661

Sara Pratt, Esq.  
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Tennessee Fair Housing Council  
107 Music City Circle, Suite 318  
Nashville, TN 37214  
(615) 874-2344

Representing Complainant:

Martie Lafferty, Esq.  
William Cox, Esq.  
Tennessee Fair Housing Council  
Nashville, TN 37214  
(615) 874-2344

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**2. Other Aggrieved Persons:**

To be determined.

**3. The following is alleged to have occurred or is about to occur:**

Discriminating in the rental of, or otherwise made unavailable or denied, dwellings to persons because of their disabilities in violation of Section 804(f)(1) of the Fair Housing Act, 42 U.S.C. § 3604(f)(1);

Discriminating in the terms, conditions, or privileges of, or the provision of services or facilities in connection with the rental of a dwelling because of disability in violation of Section 804(f)(2) of the Fair Housing Act, 42 U.S.C. § 3604(f)(2); and,

Failing to design and construct dwellings in compliance with the requirements mandated by Section 804(f)(3)(C) of the Fair Housing Act, 42 U.S.C. § 3604(f)(3)(C) and the applicable regulation, 24 C.F.R. § 100.205.

**4. The alleged violation occurred because of:**

Disability

**5. Address and location of the property in question ( or if no property is involved, the city and state where the discrimination occurred):**

Revere at Lake Wylie  
1001 Wylie Springs Circle  
Clover, SC 29710

Revere at Mooresville  
157 Hathaway Lane  
Mooresville, NC 28117

Revere at Sherrills Ford  
4000 Revere Blvd.  
Sherrills Ford, NC 28673

Revere at Tega Cay  
260 N. Revere Cove  
Tega Cay, SC 29708

Revere at Hidden Creek  
2067 Springdale Lane  
Gallatin, TN 37066

Revere at Spring Hill  
1000 Revere Place  
Spring Hill, TN 37174

Revere at Barton's Run  
100 Bartons Run Trace  
Lebanon, TN 37090

Revere at River Landing  
30 East Revere Blvd.  
Madison, AL 35756

Addison Park  
41 Addison Park Drive  
Huntsville, AL 35806

Belden Reserve  
475 Swanholme Drive  
Murfreesboro, TN 37128

Hamilton Station  
10 Hamilton Station Crossings  
Lebanon, TN 37087

Hathaway at Lebanon  
2135 Lebanon Rd.  
Lebanon, TN 37087

Worthington Glen  
1000 Worthington Ln.  
Spring Hill, TN 37174

(Collectively "Gross Residential Properties")

**6. Respondent(s)**

I. and M.J. Gross, an Ohio Corp., doing business under the trade name,  
Gross Residential

14300 Ridge Rd.  
North Royalton, OH 44133  
(440) 237-1681  
(Developer)

Revere at Lake Wylie LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Harley I. Gross

Revere at Mooretown LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Revere at Sherrills Ford LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Revere at Tega Cay LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Harley I. Gross

Revere at Hidden Creek, LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Revere at Spring Hill, LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Harley I. Gross

Revere at Barton's Run, LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Revere at River Landing LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Addison Park LLC.  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Hamilton Station Apartments, LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Victory Station Apartments, LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Victory Station Townhouses Owners Association, Inc.  
4521 Trousdale Dr Nashville, TN 37204  
Agent for Service of Process: Metropolitan Property Management, LLC

Hathaway at Lebanon, LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

Worthington Glen Apartments, LLC  
14300 Ridge Road  
North Royalton, OH 44113  
Agent for Service of Process: Gary L. Gross

GF 55 Architects LLP  
225 West 39th Street  
New York, NY 10018  
(212) 352-3099  
(Architects)

HGG Ridge Ltd.  
14300 Ridge Rd., Ste. 100  
North Royalton, OH 44133  
(440) 237-1681  
(General Contractor)

ESP Associates, Inc.  
220848 Chartwell Center Dr., Ste. D

Cornelius, NC 28031  
(704) 990-9428  
(Civil Engineer)

**7. The following is a brief and concise statement of the facts regarding the alleged violation:**

Complainants National Fair Housing Alliance and Tennessee Fair Housing Council have uncovered violations of the Fair Housing Act's accessibility requirements at thirteen of Respondents' properties in Alabama, North Carolina, South Carolina, and Tennessee. Apartments built according to a floorplan that is common across the complexes have inaccessible kitchens. The exterior areas of some of the complexes have inaccessible routes to public and common use areas. The mailboxes at some of the complexes are inaccessible. There is insufficient accessible parking at Tega Kay. Light switches are inaccessible at multiple complexes. And toilets are inaccessible at multiple complexes.

**The Parties**

The National Fair Housing Alliance (NFHA) is a private 501(c)(3) fair housing organization whose mission is to eliminate housing discrimination and ensure equal housing opportunity for all people. NFHA engages in several different programs and activities including education and outreach, public policy, membership services, community development, tech equity and enforcement to further its mission, among other activities and programs.

The Tennessee Fair Housing Council (TFHC) is a private nonprofit organization whose mission is to eliminate housing discrimination in Tennessee. TFHC provides outreach, intake/referral, and legal assistance to Tennessee residents who have experienced, or are currently experiencing, issues with their housing as a result of discrimination.

I. and M.J. Gross Company is a for-profit corporation organized under the laws of the state of Ohio, with its principal offices based in the state of Ohio. I. and M.J. Gross does business under the trade name Gross Residential and previously did business under the trade name Gross Builders. I. and M.J. Gross is a real estate development, construction, and property management company. It has participated in the design and construction of the Gross Residential Properties.

Revere at Lake Wylie LLC is an Ohio limited liability company that has its principal place of business in Ohio. Revere at Lake Wylie LLC is the owner of Revere at Lake Wylie.

Revere at Moorestown LLC is an Ohio limited liability company that has its principal place of business in Ohio. Revere at Moorestown LLC is the owner of Revere at Moorestown.

Revere at Sherrills Ford LLC is an Ohio limited liability company that has its principal place of business in Ohio. Revere at Sherrills Ford LLC is the owner of Revere at Sherrills Ford.

Revere at Tega Cay LLC is an Ohio limited liability company that has its principal place of business in Ohio. Revere at Tega Cay LLC is the owner of Revere at Tega Cay.

Revere at Hidden Creek LLC is an Ohio limited liability company that has its principal place of business in Ohio. Revere at Hidden Creek LLC is the owner of Revere at Hidden Creek.

Revere at Spring Hill LLC is an Ohio limited liability company that has its principal place of business in Ohio. Revere at Spring Hill LLC is the owner of Revere at Spring Hill.

Revere at Bartons Run LLC is an Ohio limited liability company that has its principal place of business in Ohio. Revere at Bartons Run LLC is the owner of Revere at Bartons Run.

Revere at River Landing LLC is an Ohio limited liability company that has its principal place of business in Ohio. Revere at River Landing LLC is the owner of Revere at River Landing.

Addison Park LLC is an Ohio limited liability company that has its principal place of business in Ohio. Addison Park LLC is the owner of Addison Park.

Victory Station Apartments, LLC is an Ohio limited liability company that has its principal place of business in Ohio. Victory Station Apartments, LLC was the owner of Belden Reserve from 2012 through 2020 and does business under the assumed name Belden Reserve Apartments.

Victory Station Townhouses Owners Association, Inc., is a Tennessee corporation. Victory Station Townhouses Owners Association, Inc., is the owner of Belden Reserve.

Hamilton Station Apartments LLC is an Ohio limited liability company that has its principal place of business in Ohio. Hamilton Station LLC is the owner of Hamilton Station.

Hathaway at Lebanon LLC is an Ohio limited liability company that has its principal place of business in Ohio. Hamilton Station LLC is the owner of Hamilton Station.

Worthington Glen Apartments LLC is an Ohio limited liability company that has its principal place of business in Ohio. Worthington Glen LLC is the owner of Hamilton Station.

Respondent GF55 Architects LLP. is a domestic limited liability partnership, organized under the laws of the state of New York, with its principal office in Williamsville, New York. It designed and drew the plans for Revere at Mooresville and Revere at Sherrills Ford. On information and belief, GF55 Architects LLP designed and drew the plans for other Gross Residential Properties named in the complaint.

Respondent Leonard Fusco is an architect licensed in New York. He is the manager partner of GF 55 Architects LLP. His principal place of business is in New York, New York. On information and belief, Leonard Fusco approved the plans for some or all of the properties designed and drawn by GF 55 Architects LLP.

HGG Ridge, Ltd., is an Ohio limited liability corporation. On information and belief, HGG Ridge was the general contractor responsible for day-to-day oversight of the development of Lake Wylie, Sherrills Ford, and Mooresville.

Respondent ESP Associates, Inc. is a corporation registered in North Carolina. On information and belief, ESP Associates is responsible for the civil engineering for Tega Cay, Lake Wylie, Sherrills Ford, and Mooresville.

### **Violations of the Fair Housing Act**

According to its website, I. and M.J. Gross has “over 100 years of experience” and has “built a portfolio of 41 communities with over 13,000 apartment homes centered in the suburbs of Cleveland, OH., Nashville, TN., Huntsville, AL., and the suburbs of Charlotte in both North and South Carolina.” *Our Story*, Gross Residential (2024), <https://www.grossresidential.com/About-Us.aspx>.

The Gross Residential Properties were designed and constructed for first occupancy after March 13, 1991. The dwellings at each of these Properties are built according to a set of identical or highly similar floorplans. Each Property consists of one or more buildings with at least



four dwelling units. The ground floor units in each building is a “covered multifamily dwelling” and subject to the accessibility requirements of the Fair Housing Act. The public and common use areas of each Property are also subject to the Fair Housing Act’s accessibility requirements. A plaintiff or complainant may establish a *prima facie* case of a violation of these requirements by proving a failure to comply with HUD’s Fair Housing Amendments Act Guidelines, 56 Fed. Reg. 9472 (Mar. 6, 1991) (“*Guidelines*”), codified at 24 C.F.R. Ch. I, Subch. A, App. II (Apr. 1, 1995). In addition, HUD’s Fair Housing Act Design Manual provides clear guidance on ways to design and construct housing that complies with the Fair Housing Act. U.S. Dep’t of Hous. & Urb. Dev., *Fair Housing Act Design Manual: A Manual to Assist Designers and Builders in Meeting the Accessibility Requirements of the Fair Housing Act* (rev. 1998) (“*Design Manual*”).

Complainants NFHA and TFHC investigated the Gross Residential Properties by testing for accessibility, visiting the properties to evaluate accessibility issues, taking photographs of exterior and interior elements of the property, reviewing photographs available online showing the interior of units, and reviewing building plans, photographs, occupancy permits, and ownership data. NFHA and TFHC uncovered violations of the FHA’s accessibility requirements.

### **Unusable Kitchens**

Regulations implementing the Fair Housing Act require that covered dwellings have “[u]sable kitchens . . . such that an individual in a wheelchair can maneuver about the space.” 24 C.F.R. § 100.205. To qualify as a usable kitchen, HUD’s accessibility guidelines require clear floor space of at least 30 inches by 48 inches that allows a parallel approach by a person in a wheelchair to any kitchen appliance or fixture. *Guidelines* at 9511; *Design Manual* at 7.3. Further, in U-shaped kitchens with a sink at the base of the “U” like the one in the Craftsman Select floorplan, a 60-inch diameter turning circle is required. *Guidelines* at 9511; *Design Manual* at 7.9.

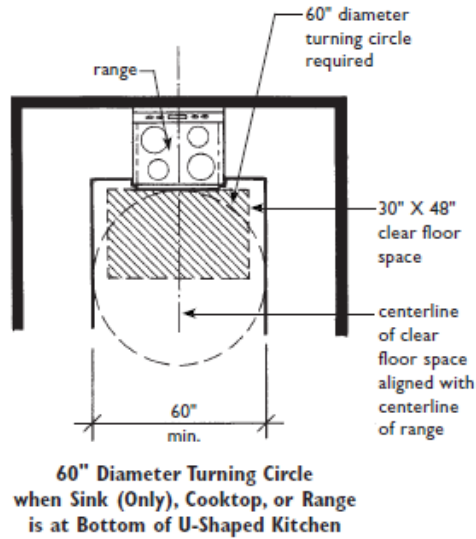


Figure 1: Diagram showing required 30" by 48" clear floor space and 60" turning diameter. *Design Manual* at 7.9

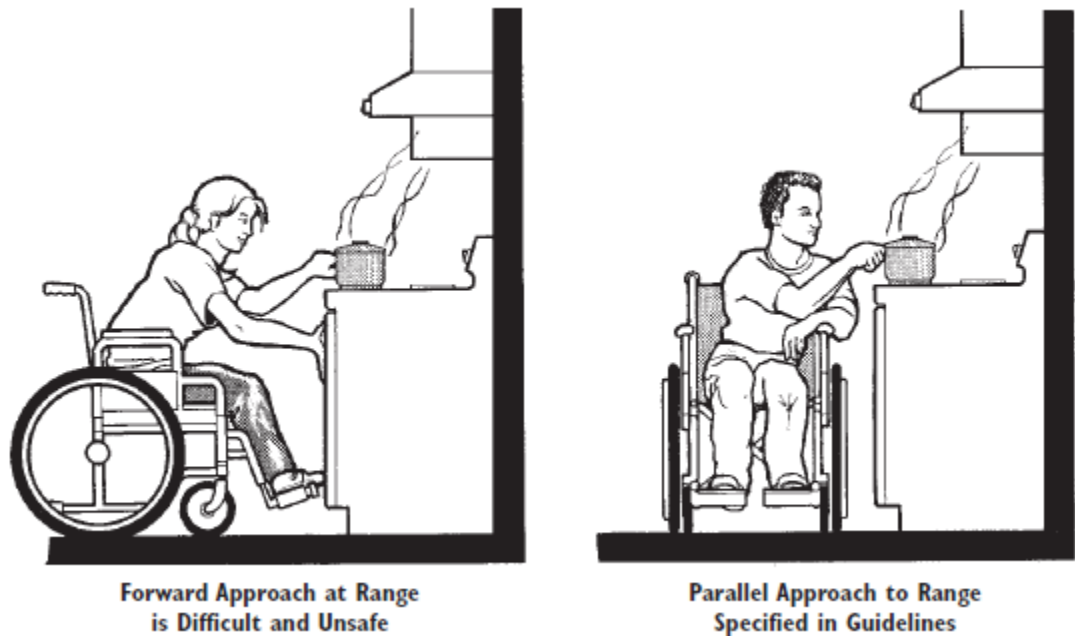


Figure 2: Diagram showing the necessity of clear floor space at the stove, refrigerator, and sink that allows a parallel approach. *Design Manual* at 7.5.

NFHA and TFHC discovered that the Craftsman Select floorplan units, both in the two- and three-bedroom styles, at the Gross Residential Properties do not have usable kitchens such that an individual in a wheelchair can maneuver about the space. There is not a clear floor space of 30" x 48" parallel to and centered on the kitchen sink such that a person

in a wheelchair can approach parallel to the sink and reach the faucets. And there is not a 60-inch turning diameter to provide adequate maneuvering space for a person using a wheelchair to approach and position themselves parallel to the appliances.

A review of the properties named in the complaint shows that all kitchens in the Craftsman Select style floorplan units, both two- and three-bedroom styles, at the Gross Residential Properties contain the same or similar violations. Upon information and belief, the same or similar violations exist in this floorplan at all Gross Residential Properties.



Figure 3: Kitchen sink in a bent U shaped kitchen in the Craftsman Select floorplan at Worthington Glen



Figure 4: Close-up of kitchen sink in the Craftsman Select floorplan at Worthington Glen showing lack of clear 30" x 48" inch floor space parallel to the sink.



Figure 5: Kitchen sink in a bent U shaped kitchen in the Craftman Select floorplan at Revere at Sherrills Ford.



Figure 6: Kitchen sink in a bent U shaped kitchen in the Craftman Select floorplan at Revere at Tega Cay



Figure 7: Kitchen sink in a bent U shaped kitchen in the Craftsman Select floorplan at Revere at River Landing

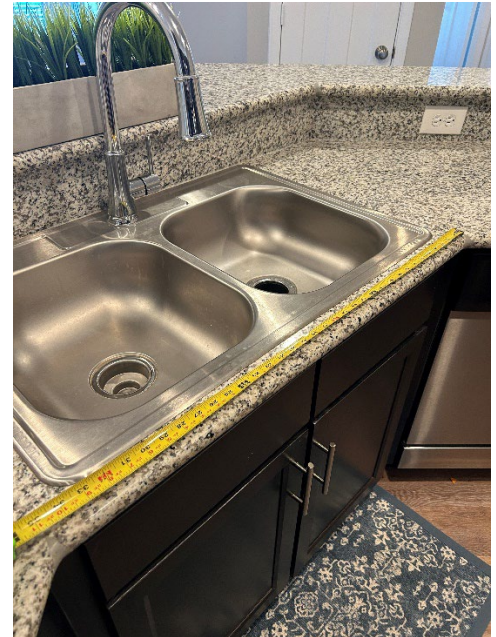


Figure 8: Close-up of kitchen sink in the Craftsman Select floorplan at Revere at River Landing showing lack of clear 30" x 48" inch floor space parallel to the sink.



The Guidelines do contain an exception to the clear space and turning diameter requirements, which allows for a “forward approach with kneespace below the sink . . . in some very small U-shaped kitchens.” *Design Manual* at 7.5.

That exception does not apply here. First, that exception only applies to very small, narrow U-shaped kitchens, see *Design Manual* at 7.5, 7.11, and the kitchens in the Craftsman Select floorplan are not designed in a narrow U-shape. Second, the exception requires clear knee space below the sink. *Id.* But the cabinet structure under the sinks in the kitchens in the Craftsman Select floorplan block that knee space, and they are not removable.



Figure 9: Cabinet structure obstructing knee space under the sink in a bent U shaped kitchen in the Craftsman Select floorplan at Revere at Lake Wylie.



Figure 10: Cabinet structure obstructing knee space under the sink in a bent U shaped kitchen in the Craftsman Select floorplan at Worthington Glen.

### **Inaccessible Routes to Common Area Amenities and Covered Dwellings**

Regulations implementing the Fair Housing Act require that “covered multifamily dwellings with a building entrance on an accessible route shall be designed in such a manner that the public and common use areas are

readily accessible to and usable by handicapped persons.” 24 C.F.R. § 100.205. HUD’s accessibility guidelines clarify that the term “accessible” in this context “means that the public or common use areas of the building can be approached, entered, and used by individuals with physical handicaps.” *Guidelines* at 9499. This requirement applies to routes to and between common areas and facilities on the same site. *Id.* at 9504; *Design Manual* at 2.15.

“An accessible route is a path that is at least 36 inches wide, smooth, as level as possible, and without hazards or obstructions.” *Design Manual* at 2.15. “Slopes that are steeper than 8.33% . . . cannot be considered part of an accessible route,” *id.* at 1.7, and “a stair can never be part of an accessible route,” *id.* at 2.17.

Some Gross Residential Properties do not have accessible routes to amenities in the common use areas as required by the Fair Housing Act. The routes to common area amenities at Gross Residential Properties contain excessive slopes, contain stairs, and/or lack curb cuts.

### **Revere at Lake Wylie: Inaccessible Routes from Community Center and Pool to Playground**

For example, at Revere at Lake Wylie, the accessible route from the Community Center and Pool to the playground contains stairs. Stairs may not be a part of an accessible route. *Design Manual* at 2.17.



Figure 11: Stairs along the route from the Community Center and Pool to the playground at Revere at Lake Wylie.

## Revere at Mooresville: Inaccessible Route from Community Center and Accessible Parking to Building 105

At Revere at Mooresville, the route from the Community Center to Building 105, there is no curb cut in front of Building 105. The route from accessible parking to Building 105 involves parking at another building (Building 109) to access the curb cut and then accessing the ramp to Building 105, which is not the most direct route to the building. See *Design Manual* at 2.20 (“Accessible parking spaces must . . . be located on the shortest possible accessible circulation route to an accessible entrance.”).

(Before the current sales office was built, the Sales Office for the apartment complex was located in an apartment unit in Building 105.)



Figure 12: The accessible route from Building 105 to the Community Center does not contain a curb cut.





Figure 13: A map of Revere at Mooresville

**Revere at River Landing: Inaccessible Route into Building 17**

At Revere at River Landing, the route in Building 17 contains slopes exceeding 8.33%. See *Design Manual* at 2.15. (“Slopes that are steeper than 8.33% . . . cannot be considered part of an accessible route”).

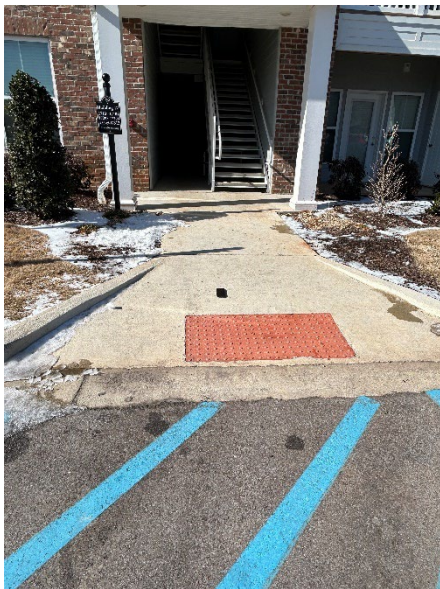


Figure 14: Slope on curb cut entering Building 17

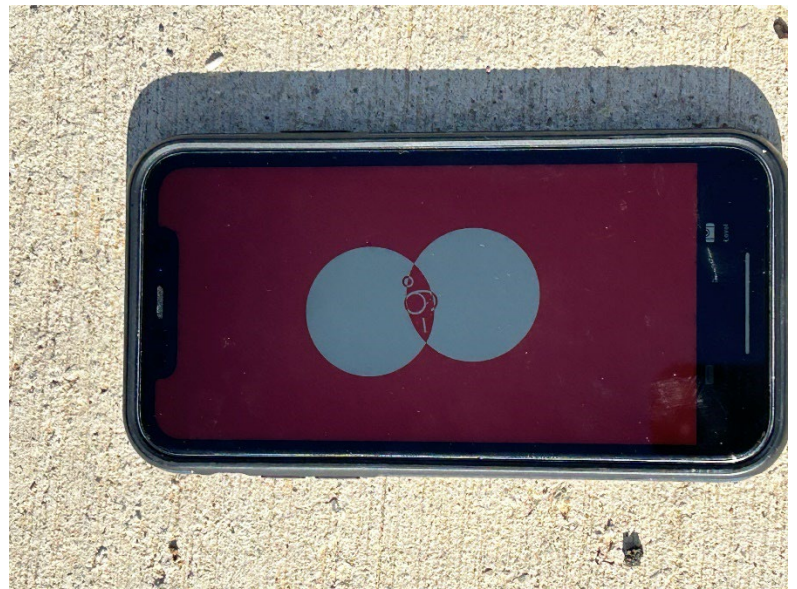


Figure 15: Close-up of slope on curb cut entering Building 17



## **Addison Park: Property Vehicle Blocking Accessible Route into Building 28**

At Addison Park, a property vehicle was blocking the accessible route into Building 28. See *Design Manual* at 2.15 (“An accessible route is a path . . . without hazards or obstructions.”).



Figure 16: Property vehicle blocking accessible route into Building 28

### **Inaccessible Mailboxes**

Mailboxes at Gross Residential Properties are not on accessible routes as required. See *Guidelines* at 9500 (defining mail areas as “common use areas”); *id.* at 9504 (requiring an accessible route to common use areas); *Design Manual* at 1.8, 2.3 (mailboxes must be on an accessible route). Furthermore, the mailboxes themselves are inaccessible because, upon information and belief, they are not located within the required reach range of a seated person as required, with the operable part no higher than 48”. See *Design Manual* at 1.11, 2.3 (mailbox areas must be

accessible and mailboxes must be within reach of a seated person); *id.* at 5.6 (48 inches is maximum reach range for a seated person).

**Revere at Lake Wylie: No Accessible Route to Mail Area**

There are no curb cuts on the route leading to the mail kiosks at Revere at Lake Wylie. As a result, these routes are not accessible, as required. See *Design Manual* at 1.8, 2.3.



Figure 17: The route leading to the mailbox kiosk containing mailboxes at the Revere at Lake Wylie does not contain a curb cut.

**Revere at Tega Cay: No Accessible Route to Mail Area**

At Revere at Tega Cay, there are not curb cuts on the route to the mail kiosk and the route to the mailboxes by Garage A contains excessive slopes. As a result, these routes are not accessible. See *Design Manual* at 1.8, 2.3 (requiring accessible routes to mailbox areas); *id.* at 2.20 (“Curb ramps . . . allow a pedestrian route to remain accessible to people who use wheelchairs and . . . are a necessity for people with mobility impairments”).



Figure 18: The route to the mail kiosk by the first gate at Revere at Tega Cay does not have curb cut.



Figure 19: The route to the mail kiosk by the second gate at Revere at Tega Cay does not have a curb cut.





Figure 20: The route by Garage A to the Mailbox Kiosk at Revere at Tega Cay



Figure 21: The route by Garage A to the Mailbox Kiosk at Revere at Tega Cay



Figure 22: The route by Garage A to the Mailbox Kiosk at Revere at Tega Cay



Figure 23: The route by Garage A to the Mailbox Kiosk at Revere at Tega Cay





Figure 24: The route by Garage A to the Mailbox Kiosk at Revere at Tega Cay

### Revere at River Landing: No Accessible Route to Mail Area

Slopes steeper than 8.33% cannot be considered part of an accessible route. At Revere at River Landing, the route to the mail area has a slope greatly exceeding 8.33%.



Figure 25: Slope along route to mail area at Revere at River Landing

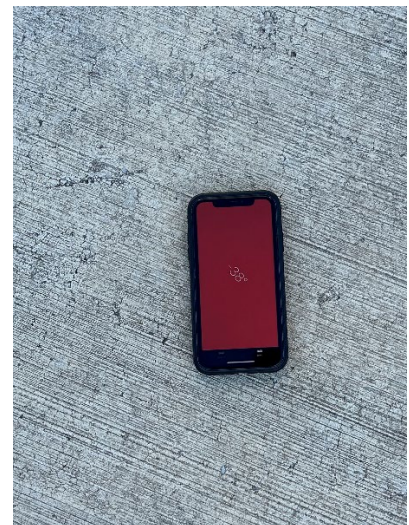


Figure 26: Close-up of slope along route to mail area at Revere at River Landing

**Revere at River Landing and Addison Park: Mailboxes Outside Maximum Reach**

At Revere at River Landing and Addison Park, the operable part of mailboxes exceeds the maximum 48 inches. See *Design Manual* at 1.11, 2.3 (mailbox areas must be accessible and mailboxes must be within reach of a seated person); *id.* at 5.6 (48 inches is maximum reach range for a seated person).



Figure 27: Mailboxes at Revere at River Landing above 48 inches



Figure 28: Mailboxes at Addison Park above 48 inches

**Inaccessible Parking**

Revere at Tega Cay has inadequate accessible parking spaces. Accessible parking spaces for residents do not have correctly sized access aisles. Access aisles must be at least 60 inches wide. *Design Manual* at 2.20. If parking spaces are available at a facility, there must be at least one accessible parking space for residents at each site amenity. *Id.* at 2.23. There are no accessible parking spaces at the dog park, pavilion, dog washing, playground, dumpster, and trash compactor at Revere at Tega Cay.



Figure 29: There are no accessible parking spaces for the trash compactor at Revere at Tega Cay. The closest accessible parking space is at Building 12. The accessible route from accessible parking at Building 12 would require descending stairs to the compactor or would require a person with a disability to cross the roadway, where an accessible route has not been maintained because there is no painted crosswalk.



Figure 30: The access aisles for disabled parking spaces at Revere at Tega Cay are too narrow because they do not “have an adjacent access aisle that is 60 inches wide.” *Design Manual* at 2.20.



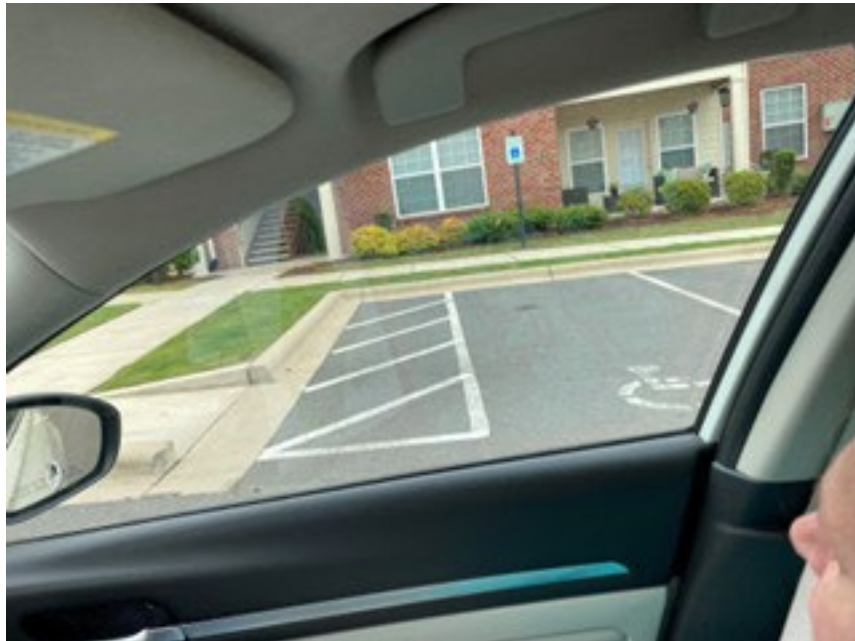


Figure 31: The access aisles for the disabled parking at Revere at Tega Cay are too narrow.

### **Inaccessible Light Switches**

HUD's accessibility guidelines require that the operable parts of light switch controls must be located no higher than 48 inches above the floor. *Guidelines* at 9507; *Design Manual* at 5.6.

Some Gross Residential Properties do not comply with this requirement. For example, at Revere at River Landing and Addison Park, the operable part of the light switch controls were above the prescribed 48 inch maximum:



Figure 32: Operable part of light switch at Revere at River Landing above 48 inches

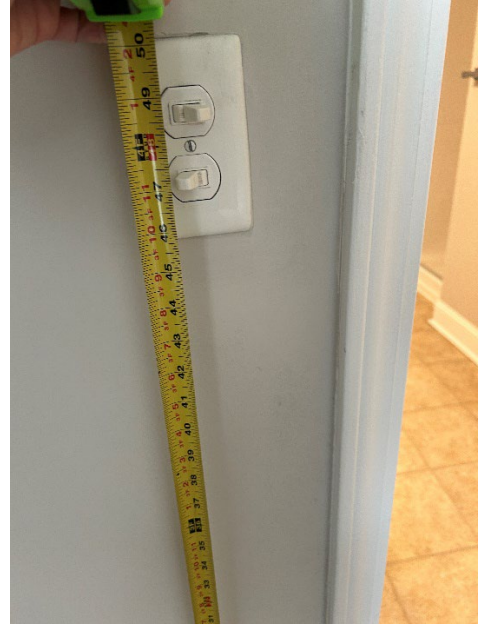


Figure 33: Operable part of light switch at Addison Park above 48 inches

### **Inaccessible Toilets**

HUD's accessibility requirements state that the distance from the centerline of a toilet to an adjacent wall must be 18 inches to allow for the installation and use of grab bars. *Design Manual* at 6.5.

Some Gross Residential Properties do not comply with this requirement. For example, at Revere at River Landing and Addison Park, the distance between the adjacent wall and the centerline of the toilet is greater than 18 inches.



Figure 34: Distance between adjacent wall and centerline of toilet at Revere at River Landing exceeds 18 inches.



Figure 35: Distance between adjacent wall and centerline of toilet at Addison Park exceeds 18 inches.

### **Injury to Complainants**

Respondents' practices have injured NFHA and TFHC by undermining their other programs designed to promote fair housing, requiring them to divert scarce resources from their usual and planned activities and instead devote substantial time and activities to identify and counteract Respondents' discrimination; frustrating their mission to increase fair and equal access to housing and eliminate segregation in the communities they serve and harming the communities they serve.

Complainants have engaged in several activities to counteract Respondents' discrimination.

#### **8. The most recent date on which the alleged discrimination occurred:**

This violation is continuing. All Gross Residential Properties have the same or similar violations of the Fair Housing Act and the designers, developers, builders, and operators of these properties are the same or related entities, consisting of one or more Respondents.

#### **9. Types of Federal Funds identified:**

None.

**10. The acts alleged in this complaint, if proven, may constitute a violation of the following:**

Sections 804(f) of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

**Please sign and date this form:**

**I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.**

*Lisa Rice*

\_\_\_\_\_  
Lisa Rice  
President and CEO  
National Fair Housing Alliance

February 8, 2024

\_\_\_\_\_  
Date

*Martie Lafferty*

\_\_\_\_\_  
Martie Lafferty  
Executive Director  
Tennessee Fair Housing Council

2/08/2024

\_\_\_\_\_  
Date