

## **ATTACHMENT B**

### **STATEMENT IN SUPPORT OF COMPLAINT OF THE FAIR HOUSING CENTER OF CENTRAL INDIANA, THE MIAMI VALLEY FAIR HOUSING CENTER, AND THE CONNECTICUT FAIR HOUSING CENTER**

#### **INTRODUCTION**

The Fair Housing Center of Central Indiana (“FHCCI”), the Miami Valley Fair Housing Center (“MVFHC”), and the Connecticut Fair Housing Center (“CFHC”) (collectively, “Complainants”) bring this multi-jurisdictional complaint against TGM Associates, L.P. (“TGM”); TGM Autumn Woods, Inc.; TGM Avalon Lake, Inc.; TGM Shadeland Station, Inc.; TGM Meadow View, Inc.; and TGM Waterford Commons, Inc. (collectively, “Respondents”) for their systemic pattern and practice of discrimination on the basis of familial status, in violation of the Fair Housing Act (“FHA”), 42 U.S.C. § 3601 *et seq.*<sup>1</sup>

Complainants’ investigation has revealed that Respondents (who own and/or operate multi-family housing complexes throughout the United States) maintain a strict “two-person per bedroom” maximum occupancy policy at a number of its properties located in Indiana, Ohio, and Connecticut. Respondents blindly enforce their occupancy policy without regard to the size or configuration of the apartment unit or the size of the unit’s bedrooms and/or habitable sleeping areas. Further, Respondents’ maximum occupancy policy is more restrictive than occupancy limitations imposed by applicable local law. Respondents’ unduly restrictive maximum occupancy policy operates both to exclude and limit the number of families with children who can live in Respondents’ communities and, accordingly, discriminates against and has a discriminatory adverse impact on families with children.

Although HUD has advised that a “two-person per bedroom” occupancy policy may, in some circumstances, be reasonable, decades of HUD guidance makes clear that HUD does not determine compliance with the FHA “based solely on the number of people permitted in each bedroom.” Occupancy Standards Notice of Statement of Policy, 63 Fed. Reg. 70256–01, 70257 (Dec. 18, 1998). Rather, HUD directs housing providers to develop “reasonable occupancy requirements based on factors such as the number and size of sleeping areas or bedrooms and the overall size of the dwelling unit.” *Id.* Further, HUD has warned that any “nongovernmental restriction” on occupancy (such as Respondents’ occupancy policy) will be carefully scrutinized “to determine whether [the policy] operates unreasonably to limit or exclude families with children.” *Id.* Indeed, HUD has consistently brought charges of discrimination against housing providers for rigidly enforcing a two-person per bedroom occupancy policy, particularly where, as here, the occupancy policy at issue was more restrictive than the local occupancy code. *See, e.g., Sec’y v. Draper and Kramer, Inc.*, 2006 WL 2848628 (HUDALJ Sept. 21, 2006) (HUD charge of discrimination alleging that respondents’ no more than two-person per bedroom policy

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<sup>1</sup> Rather than requesting that HUD conduct separate investigations by jurisdiction, Complainants have elected to file a joint complaint, as their respective investigations involved the same policy maintained by the same principal Respondent (TGM Associates, L.P.). Complainants have submitted this complaint to Region 5, as two of the three Complainants are within Region 5’s jurisdiction. HUD has, in the past, allowed Complainants’ to file multi-jurisdictional complaints within a single HUD region for the sake of efficiency.

was unreasonable, which resulted in a consent order); *Sec'y v. Insignia Fin. Grp., Inc.*, 1997 WL 768229 (HUDALJ Dec. 12, 1997) (HUD charge of discrimination alleging that respondents' refusal to rent a two-bedroom unit to a couple with three minor children constituted unlawful discrimination under the FHA, which resulted in a consent order); *Sec'y v. Peppertree Apartments*, 1994 WL 681054 (HUDALJ Nov. 10, 1994) (consent order defining "unreasonable" occupancy policy as a policy that is more restrictive than local occupancy code and enjoining respondents from adopting such a policy). Federal courts have similarly found that two-person per bedroom occupancy policies, like Respondents' policy, can have a discriminatory disparate impact on families with children in violation of the FHA. *See, e.g., Gashi v. Grubb & Ellis Prop. Mgmt. Servs., Inc.*, 801 F. Supp. 2d 12 (D. Conn. 2011).

The facts supporting Complainants' allegations and evidencing Respondents' discriminatory conduct are described in greater detail below.

## **PARTIES**

Complainant Fair Housing Center of Central Indiana ("FHCCI") is a private, non-profit fair housing organization whose mission is to ensure equal housing opportunities and eliminate housing discrimination through advocacy, enforcement, education, and outreach. To achieve its goals, FHCCI provides education programs, conducts trainings, and engages in other activities to increase fair housing knowledge among the public. FHCCI also conducts fair housing investigations and assists individuals and communities who have been impacted by unlawful housing discrimination.

Complainant Miami Valley Fair Housing Center ("MVFHC") is a private, non-profit corporation based in Dayton, Ohio. MVFHC's mission is to eliminate housing discrimination and ensure equal housing opportunity for all people, regardless of familial status or other protected characteristics. MVFHC furthers its goal by engaging in activities designed to encourage fair housing practices through educational efforts, assisting individuals who believe that they have been victims of housing discrimination, and identifying barriers to fair housing in order to help counteract and eliminate discriminatory housing practices, among other activities.

Complainant Connecticut Fair Housing Center ("CFHC") is a private, non-profit organization dedicated to ensuring that all people have equal access to housing opportunities in Connecticut. CFHC undertakes various activities to further its mission, including investigating complaints of housing discrimination; offering advice and counseling about fair housing laws; providing free legal representation to the victims of housing discrimination; conducting educational workshops on fair housing issues; working closely with city and local governments and housing providers on fair housing issues; and educating all members of the housing provider community on their rights and responsibilities under the fair housing laws.

Respondent TGM Associates, L.P. ("TGM") is an investment advisory firm that acquires, manages, and sells multi-family properties throughout the United States. Organized in 1991, TGM has since invested over \$1.8 billion in 117 multi-family residential properties in 28 states. TGM's current portfolio includes approximately 50 properties with over 13,000 units in 23 states. TGM's property management division, TGM Communities, specifically provides

property management services, including marketing and leasing. This complaint is based on testing at certain multi-family residential properties in Indiana, Ohio, and Connecticut, but TGM's policies are believed to be in effect at a number of its properties nationwide.

Respondent TGM Autumn Woods, Inc. is the owner and/or managing entity of TGM Autumn Woods ("Autumn Woods"), a multi-family, TGM apartment complex located in Indianapolis, Indiana. Autumn Woods consists of spacious one- and two-bedroom apartment units.

Respondent TGM Avalon Lake, Inc. is the owner and/or managing entity of TGM Avalon Lake ("Avalon Lake"), a multi-family, TGM apartment complex located in Indianapolis, Indiana. Avalon Lake consists of spacious (and newly renovated) one-, two-, and three-bedroom apartment units.

Respondent TGM Shadeland Station, Inc. is the owner and/or managing entity of TGM Shadeland Station ("Shadeland Station"), a multi-family, TGM apartment complex located in Indianapolis, Indiana. Shadeland Station consists of one- and two-bedroom apartment units for rent.

Respondent TGM Meadow View, Inc. is the owner and/or managing entity of TGM Meadow View ("Meadow View"), a multi-family, TGM housing complex in Columbus, Ohio. TGM Meadow View offers one- and two-bedroom floor plans.

Respondent TGM Waterford Commons, Inc. is the owner and/or managing entity of TGM Waterford Commons ("Waterford Commons"), a multi-family, TGM apartment complex located in Manchester, Connecticut. Waterford Commons offers spacious one-, two-, and three-bedroom apartment units for rent.

As revealed by Complainants' respective investigations, each of the above-listed TGM properties maintain and enforce a discriminatory policy that limits occupancy within its units to no more than two people per bedroom.

In addition to the above-listed Respondents, this complaint is intended to be filed against any other subsidiary or division of TGM Associates (or the individually-listed properties) that owns and/or manages the above-listed properties or that is otherwise responsible for implementing, maintaining, and/or enforcing the challenged occupancy policy at these properties.

### **FACTUAL BACKGROUND AND RESPONDENTS' DISCRIMINATORY CONDUCT**

In June 2013, a woman contacted CFHC to report that she had been the victim of housing discrimination based on familial status. For approximately two years, the woman (along with her husband) had lived in a large, one-bedroom apartment at a TGM property in the state of Connecticut. In December 2012, she gave birth to a son. Her lease was set to expire in August 2013, however, she planned to renew her lease.

On June 7, 2013, before the expiration of her lease and prior to her son's first birthday, TGM sent the woman and her husband a "notice of non-renewal" to inform the couple that TGM would not renew their lease because their infant son was living with them. The notice indicated that the couple was in violation of the TGM Rental Policy Statement, which precluded more than two individuals from living in a one-bedroom unit. She received this notice despite the fact that her one-bedroom apartment was large enough to accommodate a couple with a child according to local occupancy code. The woman also reported that she had been made aware of other prospective tenants whose applications for rental housing at the property had been denied because they had children.

Although the woman ultimately decided that she did not want to pursue the matter beyond her complaint to CFHC, her report regarding TGM's occupancy policy prompted CFHC to launch an independent investigation of TGM's conduct. Additionally, after learning that TGM owned and/or managed properties in Indiana and Ohio, CFHC contacted FHCCI and MVFHC to inform them of Respondents' potential discriminatory conduct. FHCCI and MVFHC launched investigations of the Respondents in their respective jurisdictions.

Each Complainant initiated a series of controlled tests to determine the nature and extent of Respondents' discriminatory conduct. Complainants' testing and investigation confirmed that Respondents maintain a rigid and unreasonable two-person per bedroom policy that is more restrictive than local occupancy standards at many of Respondents' apartment units. Complainants' testing and investigations are summarized below.

### ***FHCCI Testing/Investigation***

In September 2013, Complainant FHCCI conducted testing at three of Respondents' properties in Indianapolis, Indiana (Marion County)—Autumn Woods, Shadeland Station, and Avalon Lake—in order to ascertain whether Respondents enforced an unduly restrictive and discriminatory maximum occupancy policy at these properties. At Autumn Woods, an FHCCI tester posed as a married woman looking to rent a one-bedroom unit for herself, her husband, and a small child. FHCCI's tester, however, was told that her family could not rent a one-bedroom unit at Autumn Woods, per operation of TGM's two-person per bedroom occupancy policy. Documents that TGM supplied to the tester indicated that this policy applied throughout the property.

After confirming the existence of a two-person per bedroom occupancy policy, FHCCI conducted additional investigation to determine whether Autumn Woods' policy was unreasonable in light of factors considered by HUD in assessing occupancy restrictions, for example the size and configuration of the unit and the application of any local occupancy code. FHCCI's additional investigation revealed that Respondents' occupancy policy at Autumn Woods was unduly restrictive.

Autumn Woods offers three different floor plans for one-bedroom units—the "Cedar," the "Maple," and the "Oak." These one-bedroom floor plans range from approximately 700 to 850 square feet. Each unit contains a large bedroom and an open living room and dining room

area. The Cedar floor plan also includes an open loft-area. Autumn Woods' one-bedroom floor plans are attached as Exhibit A.

Pursuant to Marion County's Minimum Standards for Residential Property and Housing ("Marion County Code" or "code") the maximum occupancy of any dwelling unit in the County is 150 square feet for the first occupant and at least 100 square feet for each additional occupant. Marion County Code at § 10-801. Per the code, floor space is calculated on the basis of total "habitable rooms." *Id.* The code defines a "habitable room" as a "room or enclosed floor space used or intended to be used for living, sleeping, cooking or eating." *Id.* at § 10-205. The chart below summarizes the maximum number of permissible occupants for one-bedroom units at Autumn Woods under the Marion County Code.

| Autumn Woods (Indianapolis, IN) |                    |   |                                 |   |
|---------------------------------|--------------------|---|---------------------------------|---|
| Floor plan                      | Number of Bedrooms | Total habitable area (sq. ft.), excluding kitchen | Total advertised area (sq. ft.) | Total number occupants permissible under occupancy code |
| Cedar                           | 1                  | 496   | 850                             | 4   |
| Maple                           | 1                  | 432   | 775                             | 3   |
| Oak                             | 1                  | 400   | 710                             | 3   |

As detailed in the chart above, Autumn Woods' policy that precludes more than two people from living in a one-bedroom unit is more restrictive than local occupancy standards.

Although FHCCI did not test two-bedroom units at Autumn Woods, Respondents' two-person per bedroom policy is similarly more restrictive than local occupancy code with respect to two-bedroom units within the complex, as detailed in the chart below.

| Autumn Woods (Indianapolis, IN) |                    |   |                                 |   |
|---------------------------------|--------------------|---|---------------------------------|---|
| Floor plan                      | Number of Bedrooms | Total habitable area (sq. ft.), excluding kitchen | Total advertised area (sq. ft.) | Total number occupants permissible under occupancy code |
| Chestnut                        | 2                  | 587   | 940                             | 5   |
| Sycamore                        | 2                  | 567   | 1045                            | 5   |
| Sequoia                         | 2                  | 700   | 1285                            | 6   |

FHCCI also conducted a test at TGM's Shadeland Station. Shadeland Station offers a single, one-bedroom floor plan, which is named the "Hudson." The floor plan for the Hudson is attached as Exhibit B.

An FHCCI tester contacted Shadeland Station and represented that she was looking to rent a one-bedroom apartment in the complex for a total of three people (herself, her husband,

and a small child). The test confirmed that the two-person per bedroom policy was similarly enforced at Shadeland Station. The agent told the tester that she could not rent a one-bedroom unit for three people. As detailed in the chart below, however, the Hudson unit can accommodate three people under the local occupancy code.

| Shadeland Station (Indianapolis, IN) |                    |   |                                 |   |
|--------------------------------------|--------------------|---|---------------------------------|---|
| Floor plan                           | Number of Bedrooms | Total habitable area (sq. ft.), excluding kitchen | Total advertised area (sq. ft.) | Total number occupants permissible under occupancy code |
| Hudson                               | 1                  | 361.5   | 700                             | 3   |

Finally, FHCCI conducted testing at a third TGM property—Avalon Lake. FHCCI's testing at the Avalon Lake complex similarly revealed the existence of a rigid two-person per bedroom occupancy policy. FHCCI's Avalon Lake tester posed as a woman seeking to rent a two-bedroom apartment unit for herself, her husband, and her three minor children. A TGM agent confirmed that TGM enforced a two-person per bedroom occupancy policy and, accordingly, the tester was not eligible to rent a two-bedroom apartment.

Respondents' maximum occupancy policy with respect to two-bedroom units at Avalon Lake is more restrictive than the Marion County Code, as summarized in the chart below. Additionally, two-bedroom Avalon Lake floor plans are attached as Exhibit C.

| Avalon Lake (Indianapolis, IN) |                    |   |                                 |   |
|--------------------------------|--------------------|---|---------------------------------|---|
| Floor plan                     | Number of Bedrooms | Total habitable area (sq. ft.), excluding kitchen | Total advertised area (sq. ft.) | Total number occupants permissible under occupancy code |
| Caravelle                      | 2                  | 690   | 1108                            | 6   |
| Odyssey                        | 2                  | 577   | 1090                            | 5   |
| Paragon                        | 2                  | 612   | 896                             | 5   |
| Cobalt                         | 2                  | 921   | 1345                            | 8   |

That Respondents enforce the same maximum occupancy policy in a unit that has 921 square feet of habitable living space as it does a unit with 690 square feet of habitable living space establishes that Respondents blindly enforce their restrictive policy without regard to the size or configuration of the available unit.

### ***MVFHC Testing/Investigation***

In October 2013, Complainant MVFHC conducted a series of tests at Meadow View, a TGM property in Columbus, Ohio (Franklin County). MVFHC's testers posed as prospective tenants who were looking to rent two-bedroom apartment units for varying numbers of occupants. Each MVFHC tester made contact with a TGM agent.

MVFHC’s tests confirmed that TGM enforces and maintains the same strict, two-person per bedroom occupancy policy at Meadow View as it does at its properties in Indianapolis. The MVFHC tester seeking to rent a two-bedroom apartment at Meadow View with her husband and three, minor children was unequivocally informed that she could not rent housing at Meadow View, per operation of this policy.

Like FHCCI, after confirming the existence of a two-person per bedroom occupancy policy, MVFHC conducted additional investigation to determine whether Meadow View’s policy was more restrictive than local occupancy limitations. MVFHC’s additional investigation revealed that Meadow View’s occupancy policy is, in fact, unduly restrictive.

Meadow View offers two floor plans for two bedroom units—the Waterford and the Remington. Both floor plans are spacious, two-level townhomes that range from 1213 to 1248 square feet. Meadow View’s two-bedroom floor plans are attached as Exhibit D. As evidenced by the attached floor plans, both models contain large bedrooms and an open living and dining area.

Pursuant to the Franklin County Board of Health Housing Maintenance and Occupancy Code (“Franklin County Code” or “code”), the maximum occupancy of any dwelling unit is 140 square feet for the first occupant of the unit and at least 100 square feet for each additional occupant. Franklin County Code at § 710.06 (B) (1). Per the code, floor space is calculated on the basis of total “habitable rooms.” *Id.* The code defines a “habitable room” as a “room or enclosed floor space arranged for living, cooking, eating, or sleeping purposes, but does not include a room used as a bathroom, water closet compartment, laundry, pantry, foyer, hallway, kitchenette, or other accessory floor space.” *Id.* at § 710.01 (EE). The chart below summarizes the maximum number of permissible occupants for two-bedroom townhomes at Meadow View under the Franklin County Code.

| Meadow View (Columbus, OH) |                    |   |                                 |   |
|----------------------------|--------------------|---|---------------------------------|---|
| Floor plan                 | Number of Bedrooms | Total habitable area (sq. ft.), excluding kitchen | Total advertised area (sq. ft.) | Total number occupants permissible under occupancy code |
| Remington                  | 2                  | 677.4   | 1248                            | 6   |
| Waterford                  | 2                  | 636.2   | 1213                            | 5   |

As detailed in the chart, Meadow View’s policy that caps the number of people who can live in a two-bedroom unit at four (4) is more restrictive than the local code for Franklin County, which (in the case of the Remington model) would allow as many as six individuals to reside in a two-bedroom unit.

Meadow View’s two-person per bedroom occupancy policy is also more restrictive than the local occupancy code for the city of Columbus. The Housing Code for Columbus, Ohio (“Columbus Code” or “code”) imposes occupancy limitations by room. Per the code, a dwelling

unit housing three to five occupants must have a living room that is at least 120 square feet, a dining room that is at least 80 square feet, and a kitchen that is at least 50 square feet. Columbus Code at § 4541.015. Further, pursuant to the Columbus Code, any room occupied for sleeping purposes by more than one person is required to contain at least 50 square feet of floor area per occupant. *Id.* at § 4541.01.

As evidenced by the attached floor plan, a family of five could live in either the Remington or Waterford units under the Columbus Code. With respect to the Remington floor plan, the living room is 240 square feet (twice the size required for three to five occupants under the Columbus Code) and the dining room is approximately 120 square feet (which is greater than the minimum square footage for dining rooms under the Columbus Code).<sup>2</sup> Similarly, the two bedrooms are large enough to accommodate a total of 5 people. As noted above, the Columbus Code requires a minimum of 50 square feet per occupant for a room accommodating more than one person; the bedrooms in the Remington model are 149.8 and 186 square feet, respectively. In fact, the unit could ostensibly accommodate six people under the Columbus code, as the first bedroom (that is 149.8 square feet) is within 0.2 square feet of the minimum requirement for three occupants in a bedroom.<sup>3</sup>

The Waterford floor plan can similarly accommodate up to five people under the Columbus Code. The living room is 240 square feet, the dining room is over 80 square feet, and the bedrooms are large enough to collectively accommodate up to five people for sleeping purposes (126.3 and 186 square feet, respectively).

### ***CFHC Testing/Investigation***

CFHC conducted testing at TGM's Waterford Commons property in Manchester, Connecticut on August 30, 2013 and confirmed that TGM enforces a two-person per bedroom occupancy policy at that property. CFHC's tester posed as a woman who was interested in renting the largest one-bedroom floor plan available for her three-person family (which consisted of herself, her husband, and a minor child). TGM's agent told the tester that only two people were allowed to live in any one-bedroom apartment.

Further CFHC investigation revealed that a policy capping the number of individuals who can reside in a one-bedroom unit at Waterford Commons, and specifically the property's very largest one-bedroom unit, at two is more restrictive than local occupancy limitations. Like the Columbus Code, the Town of Manchester Housing Standards ("Manchester Code" or "code") imposes occupancy limitations by room. A dwelling occupied by three people (the number of individuals in the CFHC tester's household) must have a living room that is at least 120 square feet, a dining room that is at least 80 square feet, and a kitchen that is at least 50 square feet.

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<sup>2</sup> The Remington and Waterford floor plans do not include floor area measurements for the kitchens; however, upon information and belief, the kitchens in these units are at least 50 square feet, as the minimum area requirement for a kitchen in any dwelling unit occupied by at least one inhabitant is 50 square feet. Columbus Code at § 4541.015.

<sup>3</sup> The minimum occupancy area requirements for six or more occupants under the Columbus Code is 150 square feet for the living room and 100 square feet for the dining room. Columbus Code at § 4541.015. Accordingly, the dining and living rooms in the Remington model are larger than the Columbus Code's minimum occupancy area requirements for six or more occupants.



Manchester Code § at 242-26(E). Further, pursuant to the code, any area used for sleeping purposes for one occupant is required to contain at least 70 square feet of floor area; any room occupied for sleeping purposes by more than one person is required to contain at least 50 square feet of floor area per occupant. *Id.* at § 242-26(C).

The largest one-bedroom floor plan at Waterford Commons is the “Carlton I.” The Carlton I floor plan is attached as Exhibit E. A family of three would be permitted to live in this unit under the local occupancy code. The bedroom in the Carlton 1 unit is almost 180 square feet (large enough for 3 occupants), the living room is over 170 square feet (which is greater than the Code’s 120 square foot limitation), the dining room is approximately 117 square feet (larger than 80 square feet), and the kitchen is approximately 100 square feet (bigger than 50 square feet). Nonetheless, pursuant to its occupancy policy, TGM would not allow CFHC’s tester to rent this spacious unit.

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As described above, Complaints’ respective investigations confirmed that Respondents enforce a strict and unreasonable maximum occupancy policy. Respondents enforce this policy without regard to any of the factors that HUD has instructed housing providers to consider—such as the size of the unit, the configuration of the unit, or any limitations imposed by the local occupancy code. Respondents’ policy has a predictable and disparate impact on families with children, as families with children are significantly more likely to be affected by policies that limit the number of people who can live in an apartment unit.

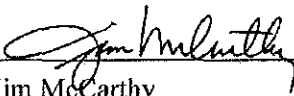
Respondents will be unable to articulate any legitimate business necessity for the strict two-person per bedroom policy enforced at many of its apartment complexes. While preventing overcrowding is a legitimate concern for a housing provider, local occupancy codes are similarly enacted to prevent overcrowding and protect the health and safety of occupants of a dwelling and, as detailed above, Respondents’ policy is more restrictive than local occupancy codes. Certainly, conforming their policy to the limitations imposed by the local occupancy code would be a less discriminatory alternative to the current two-person per bedroom policy, as it would increase the number of families with children eligible to rent units in its communities. Further, as tenants at each of the above-listed properties are responsible for paying their own utilities, Respondents cannot argue that any additional costs associated with tenants’ use of water or other utilities justifies its restrictive policy. Absent any legitimate business necessity for its practices, Respondents’ rigid occupancy policy violates the FHA.

### **INJURY CAUSED BY RESPONDENT**

As a result of Respondents’ discriminatory conduct, prospective tenants in the communities that Complainants’ serve have been, and continue to be, significantly injured. Respondents’ occupancy policy operates to both exclude and limit the number of families with children who are eligible to live in its apartment complexes.

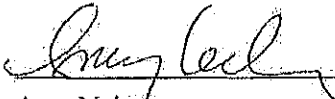
Complainants have also been directly harmed by Respondents' actions. Complainants have devoted significant resources to investigate and counteract Respondents' discriminatory occupancy policy (including through testing). Investigating this complaint has required Complainants to commit resources, including substantial staff time, in order to coordinate testing, analyze the tests conducted, and research and analyze local occupancy codes, among other things. Complainants have had to divert their scarce resources from other activities, such as education and outreach, client counseling, and community development in order to investigate this complaint. Further, Respondents' discriminatory practices have frustrated Complainants' respective missions of ensuring that all people within their respective jurisdictions have equal access to housing opportunities regardless of familial status.

Executed on 08/12/2014

  
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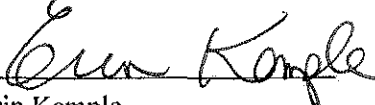
Jim McCarthy

Miami Valley Fair Housing Center

  
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Amy Nelson

Fair Housing Center of Central Indiana

  
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Erin Kemple

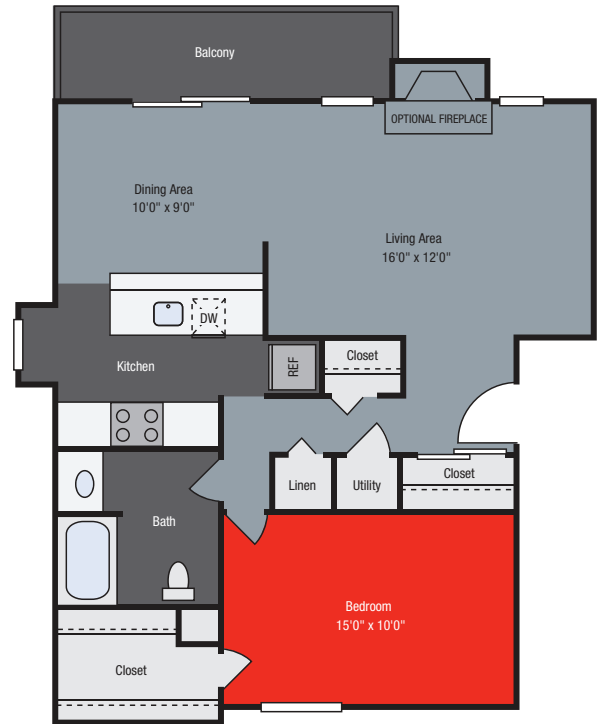
Connecticut Fair Housing Center

# **EXHIBIT**

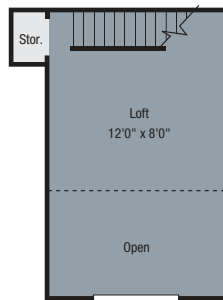
**A**



**The Oak**  
1 Bedroom | 1 Bath  
710 Square Feet



**The Maple**  
1 Bedroom | 1 Bath  
775 Square Feet



**The Cedar**  
1 Bedroom | 1 Bath  
850 Square Feet

\*Please contact a Leasing Associate for floor plan variations and details. Plans are for illustrative purposes only. Dimensions and specifications may change without notice.

# **EXHIBIT**

**B**

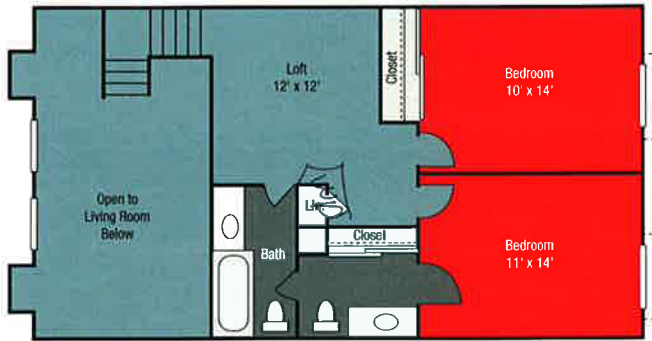
## Shadeland Station—The Hudson

700 Sq. Feet  
Starting at \$675

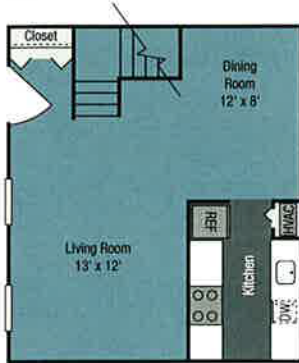


# **EXHIBIT**

**C**

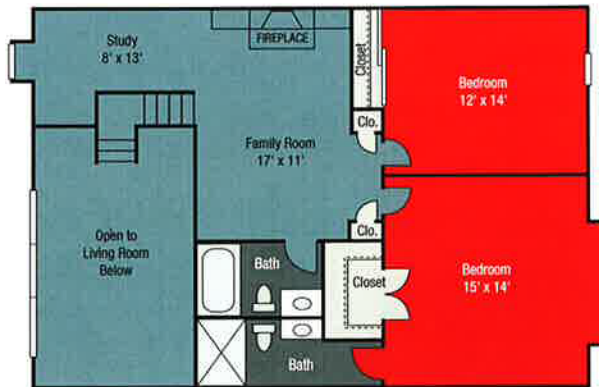


Upper



Lower

**Caravelle**  
2 Bedroom | 1.5 Bath  
1,108 Square Feet



Upper

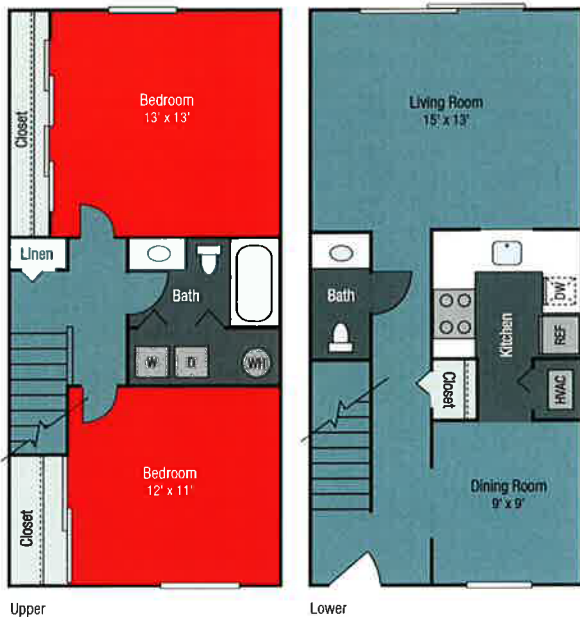


Lower

**Cobalt**  
2 Bedroom | 2 Bath  
1,345 Square Feet

\*Please contact a Leasing Associate for floor plan variations and details. Plans are for illustrative purposes only. Dimensions and specifications may change without notice.





### Odysseey

2 Bedroom | 1.5 Bath  
1,090 Square Feet



### Paragon

2 Bedroom | 2 Bath  
896 Square Feet

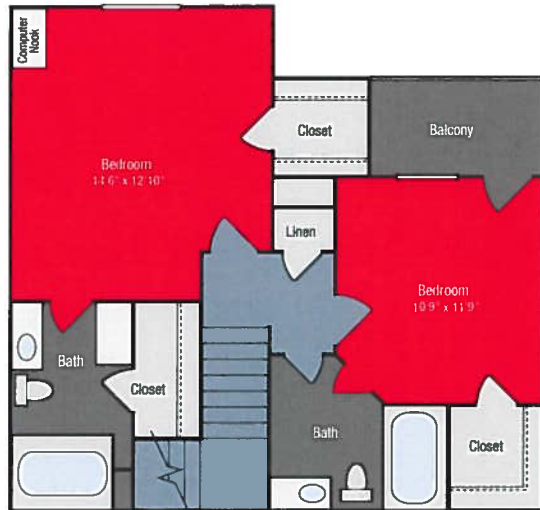
\*Please contact a Leasing Associate for floor plan variations and details. Plans are for illustrative purposes only. Dimensions and specifications may change without notice.



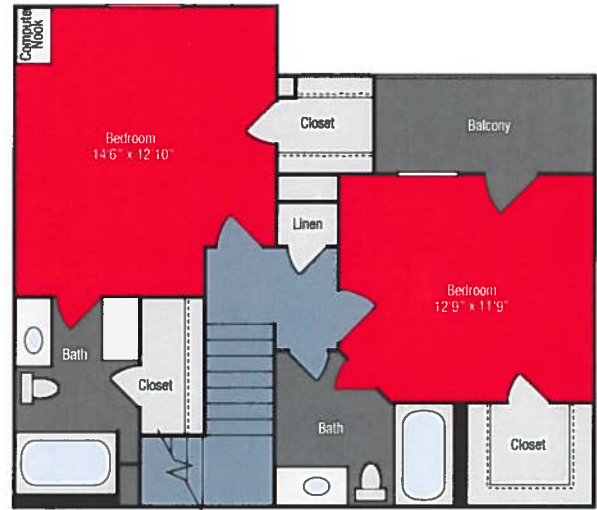
PT 113-1332

# **EXHIBIT**

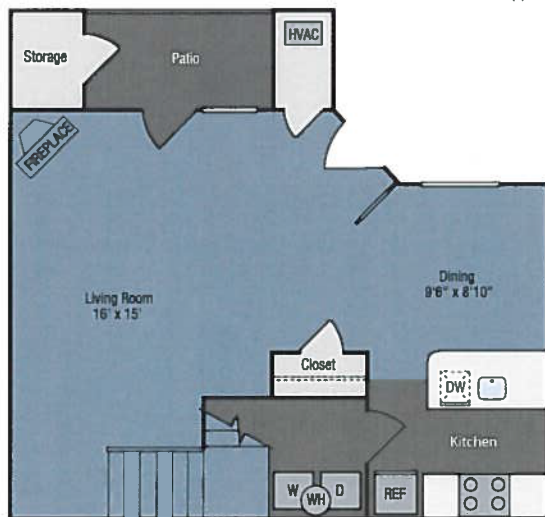
**D**



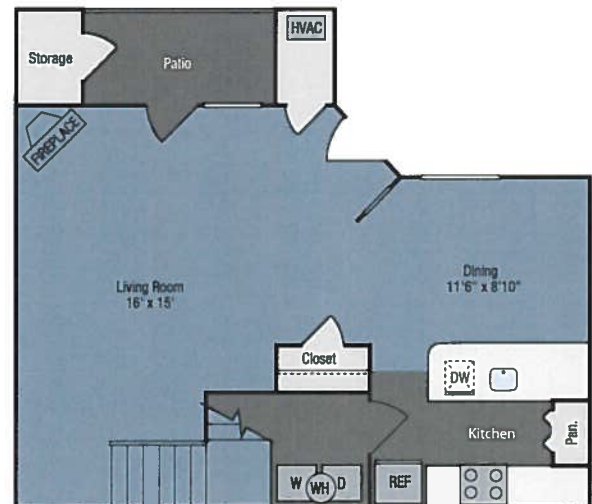
Upper



Upper



Lower



Lower

### Waterford

2 Bedroom | 2 Bath  
1,213 Square Feet

### Remington

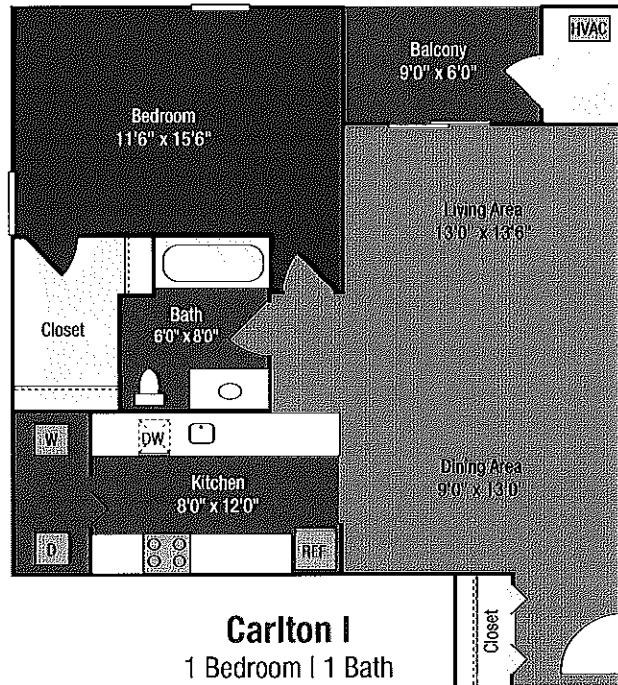
2 Bedroom | 2 Bath  
1,248 Square Feet

\*Please contact a Leasing Associate for floor plan variations and details. Plans are for illustrative purposes only. Dimensions and specifications may change without notice.



# **EXHIBIT**

**E**



\*Please contact a Leasing Associate for floor plan variations and details. Plans are for illustrative purposes only. Dimensions and specifications may change without notice.