



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Office of Fair Housing and Equal Opportunity
Midwest Regional Office, Region V
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard – Room 2101
Chicago, Illinois 60604-3507

June 21, 2017

Amy Nelson, Executive Director
Fair Housing Center of Central Indiana, Inc.
445 N. Pennsylvania Street
Suite 811
Indianapolis, IN 46204

Dear Complainant:

Subject: Housing Discrimination Complaint
Fair Housing Center of Central Indiana, Inc. v. City of Noblesville, IN
HUD Inquiry No.: 533570
HUD Title VIII Case No.: 05-17-8499-8
HUD Title VI Case No.: 05-17-8499-6

Your complaint, alleging one or more discriminatory housing practices, was officially filed as a complaint under the Federal Fair Housing Law, 42 U.S.C. Sections 3601-3619. For your records, we are enclosing a copy of your complaint, and, as required by law, a copy has been sent to the respondent(s).

Since the respondent is a recipient of Federal financial assistance, the complaint has also been accepted and will be investigated under Title VI of the Civil Rights Act of 1964 [42 U.S.C. 2000d - 2000d-4] as amended.

Title VI states:

No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

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The purpose of this letter is to inform you of: 1) the rights you have during the processing of this complaint, 2) the rights each respondent has in responding to this complaint, and 3) the steps the U.S. Department of Housing and Urban Development (the Department) will take to determine whether the complaint has merit.

In order to ensure that the Department informs you properly of the law's requirements, this notification letter contains language required by the law. A similar letter is used to notify all parties whenever a formal complaint has been filed with the Department under the Federal Fair Housing Law.

We are governed by federal law, which sets out what steps we must take when a formal complaint is filed. The law also includes steps that each respondent can take to answer or refute the allegations of this complaint.

Under federal law, a respondent can file an answer to this complaint or any amendment made to this complaint within 10 calendar days of receipt of the Department's notification letter to him or her. Each respondent's answer must be signed and affirmed that the response is truthful by including the statement "I declare under penalty of perjury that the foregoing is true and correct." A respondent can, with the agreement of the Department, amend his or her answer at any time during the investigation.

Our responsibility under the law is to undertake an impartial investigation and, at the same time, encourage all sides to reach an agreement, where appropriate, through conciliation. The law requires us to complete our investigation within 100 days of the date of the official filing of the complaint. If we are unable to meet the 100-day requirement for issuing a determination, the law requires that we notify you and the respondent(s) and explain the reasons why the investigation of the complaint is not completed.

In handling this complaint, we will conduct an impartial investigation of all claims that the Fair Housing Act has been violated. If the investigation indicates that there is insufficient evidence establishing jurisdiction, the case will be dismissed. At any point, you can request that our staff assist you in conciliating (or settling) this complaint with the respondent(s). If the case is not resolved, we will complete our investigation and decide whether or not the evidence indicates that there has been a fair housing violation. If the parties involved have not reached an agreement to settle the complaint, the Department will issue a determination as to whether there is reasonable cause to believe a discriminatory housing practice has occurred.

If our investigation indicates that there is reasonable cause to believe that an unlawful discriminatory housing practice has occurred, the Department must issue a charge. If the investigation indicates there is no reasonable cause to believe that discrimination has occurred, the complaint will be dismissed. In either event, you will be notified in writing.

If the determination is one of reasonable cause, the notification will advise you and the respondent(s) of your rights to choose, within 20 days, whether you wish to have the case heard by an Administrative Law Judge, or to have the matter referred for trial in the appropriate U.S. District Court.

Under federal law, even if the Department dismisses the complaint, you still have the right to bring an individual suit under the Federal Fair Housing Law. You may file your lawsuit in an appropriate federal, state or local court within two years of the date of the alleged discriminatory practice or of the date when a conciliation agreement has been violated. The law does not count, as part of the two-year period, any of the time when a proceeding is pending with the Department. You also have the legal right to file a lawsuit in court, even if your complaint formed the basis for a charge, as long as an Administrative Law Judge has not started a hearing on the record with respect to the charge.

There may be other applicable federal, state or local statutes under which you and/or the respondent(s) may initiate court action. You may consult a private attorney in this regard.

The law also requires us to notify you that Section 818 of the Fair Housing Act makes it unlawful for a respondent or anyone else to coerce, intimidate, threaten, or interfere with you in your exercise or enjoyment of, any right granted or protected under the Federal Fair Housing Law. The law also makes it illegal for anyone to coerce, threaten or interfere with you for your having aided or encouraged any other person in the exercise or enjoyment of, any right or protection granted to them under the Federal Fair Housing Law.

Additionally, under Title VI if the case is not settled, we will complete the investigation and decide whether or not the evidence indicates that the respondent is operating in noncompliance with the requirements of Title VI. The investigation will include a review of the pertinent practices and policies of the respondent, the circumstances under which the possible noncompliance occurred and any other relevant factors. If a letter of findings is issued, and the letter makes a finding of noncompliance, HUD will attempt to resolve the matter through a voluntary compliance agreement.

If the investigation indicates a failure on the part of the respondent to comply with Title VI, and if noncompliance cannot be corrected, Federal financial assistance may be suspended or terminated. Other penalties may include, but are not limited to, a referral to the Department of Justice with a recommendation for enforcement. If the investigation indicates that the respondent is operating its programs in compliance with Title VI, the complaint will be dismissed. In either event, you will be notified of the outcome in writing.

Title VI [24 CFR Part 1.7(e)] makes it unlawful for a recipient or anyone else to intimidate, threaten, coerce, or discriminate against any person for the purpose of interfering with any right or privilege secured by this part or because he or she has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this part. Some explanatory material on the law is enclosed for your information.

If you have any questions regarding this case, please contact our office at (312) 913-8453 or (800) 765-9372. Please refer to the case number at the top of this letter in those contacts, and keep this office advised of any change of your address or telephone number. We hope this information has been helpful to you.

Sincerely,



Maurice McGough, Director
Office of Fair Housing and Equal Opportunity
Region V

Enclosures

Housing Discrimination Complaint

HUD Inquiry Number: 533570
HUD Title VIII Case Number: 05-17-8499-8
HUD Title VI Case Number: 05-17-8499-6
HUD Date Filed: June 21, 2017

1. Complainants:

Amy Nelson, Executive Director
Fair Housing Center of Central Indiana, Inc.
445 N. Pennsylvania Street
Suite 811
Indianapolis, IN 46204

Represented By: Brancart and Brancart

2. Complainant Representatives:

Christopher Brancart
Brancart and Brancart
P.O. Box 686
Pescadero, CA 94060

Representing: Fair Housing Center of Central Indiana, Inc.

3. Other Aggrieved Parties: None.

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

- Otherwise deny or make housing unavailable
- Other discriminatory acts
- Discriminatory terms, conditions, privileges, or services and facilities
- Using ordinances to discriminate in zoning and land use

5. The alleged violation occurred because of:

- National Origin
- Color

- Familial Status
- Race

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

Various property in Noblesville
Noblesville, IN

7. Respondents:

City of Noblesville, IN
City Hall
c/o John Ditslear, Mayor
16 S. 10th Street
Noblesville, IN 46060

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

The mission of Complainant Fair Housing Center of Central Indiana, Inc. (FHCCI) is to ensure equal housing opportunities by eliminating housing discrimination through advocacy, enforcement, education and outreach. The FHCCI has diverted its resources to identify and investigate the violations by Respondent Hamilton County as outlined below, and as a result its mission of ensuring equal housing opportunities in the Central Indiana area has been frustrated.

Respondent the City of Noblesville is located in Hamilton County, Indiana. Hamilton County is part of the Indianapolis-Carmel Metropolitan Statistical Area (MSA) for the United States Census Bureau. Located just north of Indianapolis/Marion County, it is the fastest growing county in Indiana and the wealthiest county in the state.

According to the U.S. Census Bureau's 2015 population estimates, the Indianapolis suburban "doughnut" counties make up four of the top five fastest-growing counties in the state. Those estimates, released in May 2016, show that Hamilton County leads the state's growth with an almost 13 percent population increase since 2010. Hamilton County is also the wealthiest county in the state. Municipalities in the county include Arcadia, Atlanta, Carmel, Cicero, Fishers, Noblesville, Sheridan, and Westfield. Within Hamilton County, the southern cities are incredibly affluent and growing. Noblesville has grown 13 percent since 2010. The County is also overwhelmingly white.

The 2010-2014 American Community Survey 5-Year Estimates put Hamilton County's population at 289,722 broken down as follows:

- 87% White
- 3.5% African American
- 3.6% Hispanic
- 5.1% Asian

In contrast, during the same time period the population of the City of Indianapolis/Marion County, located directly south of Hamilton County, was 835,097 broken down as follows:

- 62.0% White
- 27.9% African American
- 9.6% Hispanic
- 2.4% Asian

Hamilton County's racial composition as it relates to the white population and that of African Americans is even less diverse than that of the State of Indiana as a whole which is:

- 84.3% White
- 9.1% African American
- 1.6% Asian
- 5% All Other Races Combined

Hamilton County has 272 reported Section 8/Housing Choice Voucher users. While 163 of those users reside in Noblesville, only 6 reside in Carmel. Of the 272 reported Section 8/HCV users in Hamilton County, 33% are African American. Of the 163 reported Section 8/HCV users in Noblesville, 31% are African American.

Hamilton County has a total of 330 reported units of Project Based Section 8 housing; 15% of those residents are African American. While 325 units are in Noblesville, none are in Carmel. Sixteen percent of the Project Based Section 8 housing residents in Noblesville are African American. In contrast, African Americans make up 89% of the Section 8/Housing Choice Voucher holders in the City of Indianapolis and 69% of the residents of Project Based Section 8 housing there. Eighty-three percent of households on the waiting list for HUD-subsidized housing in Indianapolis are African American.

There is an extensively documented need for, and a short supply of, affordable housing in Hamilton County, especially in Noblesville and Carmel. Less than two percent (less than 2,000 units) of Hamilton County's housing stock is subsidized affordable housing. According to the Hamilton County Community Profile (2013) prepared by the Indiana Association for Community Economic Development, only 1.7% of all housing units in the County had been developed with the intent of providing affordable housing through

public programs such as the Low Income Housing Tax Credit or HUD Section 8 housing (p. 56). However, the number of eligible households in the County, earning less than 60% or less of Area Median Income (“AMI”), is nearly 25% of the population.

This need for affordable housing has continued to increase and escalate despite a building boom in the cities of Carmel and Noblesville. “Since 2011, more than 11,000 housing units have been developed in Hamilton County, about the same amount as built in Marion, Lake and Allen counties combined, according to data from Hamilton County Area Neighborhood Development (HAND). In that time frame, those counties received low-income housing tax credits for nearly 3,000 units total. Hamilton County has been awarded none.” The lack of tax credit awards is widely viewed as due to the lack of support for such development by Hamilton County, Carmel, and Noblesville government officials, regardless of identified and documented need. In conducting interviews and gathering information related to this investigation, the FHCCI was told by developers and others active in multi-family and affordable housing that there was no incentive for developers to attempt to develop affordable housing projects: Knowing that these projects will not receive Hamilton County, Carmel, and Noblesville government approval or endorsement, it is not worth the cost of even developing architectural plans or consulting costs.

The Hamilton County Community Profile 2013, created by the Indiana Association for Community Economic Development (IACED), with the support of the cities of Carmel and Noblesville, the Hamilton County Commissioners, and others, noted two significant needs to address affordable housing concerns:

“Develop and support public and private partnerships to develop affordable housing units throughout the county, with a goal that 10% of new residential building permits will be issued for housing units that meet community standards for quality and affordability.

Broaden the scope of affordable housing options that are available to workers who are needed in Hamilton County, with special consideration for single-mother families, two-parent families, and seniors who may be responsible for their grandchildren. Develop partnerships to ensure the provision of emergency shelter, transitional housing, and special needs housing in the county. Prioritize the creation of a domestic violence shelter for Hamilton County.”

The need for affordable housing choices is well-organized. In its 2016 study, the Indianapolis-based consultant Greenstreet Ltd. estimates that demand for affordable housing in Hamilton County exceeds supply by more than 10,000 units. Greenstreet Ltd. also found:

- For every one subsidized housing unit in Hamilton County, there are six cost-burdened low-income households.

- At the current rate of construction – about 100 units a year – it would take a century for supply to catch up with demand, which is expected to double by 2040. Developers would need to build 300-400 units each year to address the need.

As noted in its Hamilton County, Indiana 2016 Impediments to Fair Housing, “Hamilton County enjoys a significant level of homeownership, coupled with very low vacancy rate compared to other counties both in the state, and in the country. There is significant pressure to move into the county, which is one of the reasons that the median sales price continues to grow. The laws of supply and demand are in full force within the county. In addition, there is a fairly low number of renter households, at 21% of total households, which places it only 4% from being the lowest county in the state. The statewide average for household rental is 31%.”

In Hamilton County, the median home costs \$230,000. Hamilton County remains the strongest market in Central Indiana, outpacing other Indianapolis’ suburbs in the number of listings, pending and closed sales and median sales price. According to the Indianapolis Star, “Homes under \$200,000 are increasingly difficult to find, stymieing some would-be first-time buyers. Hamilton County continues to lead the way in homebuilding as well, accounting for 41 percent of the total new housing market in the metro region. The average price of new homes, though, is \$370,334, an inventory that agents say will do little to meet demand of buyers seeking lower prices.”

The median rent in Hamilton County is \$920. A minimum-wage worker would need to spend 77% of his/her total income to pay the rent on a market-rate one-bedroom apartment. The United Way of Central Indiana says 22 percent of Hamilton County households cannot afford the basics: housing, food, health care, child care and transportation, despite working full time. In its 2014 ALICE (Asset Limited, Income Constrained, Employed) Report, the United Way identified housing affordability in Hamilton County as “poor.” Very few units are available to persons of lower incomes in Hamilton County, especially in the cities of Carmel and Noblesville.

Hamilton County has received CDBG funding since 2004. In fiscal year 2015, Hamilton County received \$634,848 in CDBG funding. The Noblesville Housing Authority acts on behalf of Hamilton County for the administration of CDBG dollars. Hamilton County, as a recipient of CDBG funding, is responsible for compliance with numerous State and Federal laws. The City of Noblesville, along with Cities of Carmel, Fishers, and Westfield often receive the lion’s share of the grant funding. In fiscal year 2015, Hamilton County awarded the City of Noblesville \$95,334 in CDBG funds for public infrastructure improvements, namely 2,575 linear feet of sidewalk on Pleasant and Walnut Streets.

The Hamilton County 2015 Action Plan Draft identifies barriers to affordable housing, including:

- The marketability of affordable housing and increasing support from local civil leaders and the community for this type of development.
- Like many communities, “Not In My Back Yard” sentiments from the community present challenges with developers seeking re-zoning and/or support for financial assistance/grantors. (2015 Action Plan Draft at 47.)

The 2015 Acton Plan Draft goes on to state:

“To help the community as a whole overcome the barriers to affordable housing development, and also maximize the impact in the community, Hamilton County will strive to achieve the following priorities:

1. Expand the supply of safe, decent affordable housing.

In order for this type development to occur, Hamilton County must partner with local governments in the community and become advocates for affordable housing. Otherwise, the market for affluent housing will continue to drive development, squeezing more affordable housing to the surrounding counties.

While this does not mean a goal for direct development of affordable housing, the indirect effect of advocacy can open the minds of leaders in the community that believe affordable housing is not necessary in Hamilton County.

Through consultations, Hamilton County faces an uphill battle when it comes to the development or need for development of affordable housing when it has the reputation as the wealthiest county in Indiana. Having an advocate on behalf of grassroots developers, such as the Hamilton County Area Neighborhood Development Inc. (HAND) and Habitat for Humanity, will help with the financing and development of affordable housing in the future.” (2015 Action Plan Draft at p. 47-48.)

Barriers to affordable housing identified in Hamilton County’s draft Consolidated Plan include: “High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield,” and “[t]he marketability of affordable housing and increasing support from local civil leaders for this type of development.” (Hamilton County 2014-2018 Consolidated Plan – Draft - July 2, 2014 - at p. 75.)

From the Draft Plan: “Hamilton County will seek private/public partnerships to help achieve these goals and target communities working together to increase affordable housing options. Both of these key ingredients will help achieve the goals while addressing some of the biggest barriers to affordable housing development, such as educating the public and civil leaders about affordable housing, advocating for transportation options in more rural areas of the community and working together to attract additional subsidy to overcome high cost of property acquisition.” (Hamilton County 2014-2018 Consolidated Plan – Draft (July 2, 2014) at p. 76.)

According to the 2010-2014 American Community Survey 5-Year Estimates, the population of the City of Noblesville was 56,576 broken down as follows:

90.0% White
4.4% African American
4.6% Hispanic
1.9% Asian

The City of Noblesville is an affluent city located in the southeast corner of Hamilton County, mostly consisting of single family homes. According to Christy Langley, Noblesville planning department director, the average square footage of a new home in Noblesville in 2015 was more than 4,300. In 2006, the average was 3,287 square feet. Twenty-two hundred square feet is the smallest homes the council will likely consider, said Langley. Langley also told the Indiana Business Journal that the Noblesville City Council had imposed some architectural requirements, including the elimination of vinyl siding as an option, in order to keep the price point of new housing at the price they want it to be.

In 2016, the Noblesville City Council approved the construction of hundreds of upscale homes and apartments. The City of Noblesville put conditions on those approvals including adding open space and amenities. Despite requiring developers to make upgrades in order to obtain approval of their market-rate housing projects, the City of Noblesville does not require any developers to set aside any units of affordable housing. While Noblesville does apparently recognize the need for more “diverse” housing – a wider mix of densely built communities, such as townhomes and condos on smaller lots – Noblesville appears only interested in housing diversity to appeal to “empty nesters and millennials.”

Also, the City of Noblesville has passed zoning ordinances that specifically prohibit subsidized housing. On July 9, 2013, the Common Council of the City of Noblesville passed Ordinance 21-06-13 (the “2013 Ordinance”) amending the Unified Development Ordinance for the City of Noblesville. The 2013 Ordinance specifically amended Sections 6.4 and 7.4 of the Noble West PD Ordinance. Section 3 of the 2013 Ordinance provided, in pertinent part:

“Section 7.4 of the Noble West PD Ordinance is hereby amended and restated, with respect only to the real estate described in the attached Exhibit A, in its entirety as follows:

- B. No three (3) bedroom units or greater shall be permitted.
- C. No rent subsidies shall be sought or accepted from any federal, state or local program. Developer, its assigns, successors, affiliates or subsidiaries will not apply for and will not accept designation from the United States Department of Housing and Urban Development (“HUD”) or any locally administered public housing agency (“PHA”) as a qualified Housing Provider for any rent subsidization program

administered by HUD or a PHA now or in the future.”

The developer was required to agree not to build three-bedroom units, as had originally been planned, and to agree not to accept rent subsidies of any kind. During the June 25, 2013 Common Council hearing, several neighbors expressed concerns about a proposed multi-family housing development. To address concerns, the proposed developer noted, “Everything about this development is aimed at the young professional. This is not a family oriented development. There are no playgrounds, sandboxes, or 3 or 4 bedroom units. The amenities and such being designed will not encourage families to want to locate here. Maefield has tried to fit this in with the type of development the City was looking for. The development was described as high-end” with an estimated rent of \$900 – \$1,850 per month.

Complainant FHCCI is informed and believes that the 2013 Ordinance continues to govern the Noble West PD, explicitly prohibiting the provision of development of subsidized housing.

Previously, on July 12, 2008, the Common Council of the City of Noblesville passed Ordinance 32-6-08 (the “2008 Ordinance”) amending the Unified Development Ordinance for the City of Noblesville. The 2008 Ordinance specifically amended the Promenade PD Ordinance with respect to the zoning of 153.25 acres, providing, in pertinent part, as permitted uses in the 32 acre Promenade Landing Area:

- (1) All uses allowed in the R5 District shall be permitted.
- (2) No rent subsidies shall be sought or accepted from any federal, state or local program.

Complainant FHCCI is informed and believes that the 2008 Ordinance continues to govern the Promenade PD, explicitly prohibiting the provision or development of subsidized housing.

In addition to the discriminatory ordinances above restricting housing opportunity for persons or developers using rent subsidies, the Noble West ordinance limits occupancy to two bedrooms or fewer directly impacting families with children and denying housing opportunity. The meeting minutes of the City of Noblesville Common Council document discussion by Council members of the need for restrictions of multi-family and affordable housing development included such comments below specifically identifying the City’s goal to directly impact housing choice for families with children:

- “Mr. Johnson stated the Council has been working to raise our standards. Concerning apartments, we are trying to get builders to commit to luxury apartments.”
- “Mr. Duvall stated it is a big safety issue and it costs the school a lot more per kid to educate the ones in the apartments as it costs the city more for police and

fire. It really puts the burden on us and the taxpayers...Mayor Ditslear stated they are finished with subsidized apartments. They are only approving two bedroom, market rate and the children per apartment is much reduced...Mr. Duvall said what they are saying is apartments causes them a lot more problems. Mr. Boice said there are very few topics that are debated more than what apartments are. There are people that feel strongly on one side and others are strongly on the other. Mr. Berghoff stated they all have the consideration of the community in mind.”

The subsequent approval of the multi-family element of the Union Cross PD in July 2016 was in keeping with the sentiments expressed in that 2014 joint session. The developer proposed 270 units of market-rate apartments. The project contained 108 one-bedrooms, 144 two-bedrooms, and only 18 three-bedrooms. Council member Rowland expressed her concerns at the June 28, 2016 meeting:

“The Council needs to know how the apartments would impact the area. How many apartments does the City already have? How many cars would this development bring, and how many children would be in the schools? The City is a business, so the Council needs to look at services and see how this development fits into the big picture. Ms. Rowland stated she is sure the developers have this information. The Council needs to see the City’s side. She is struggling to see how this development fits and the impact it would have.”

At the July 12, 2016 meeting, the Council expressed concern that the apartments be market rates:

“Ms. Rowland asked if any apartments would be rented at discount rates. Mr. Howard replied they will be market rate apartments. There will be no subsidies. There is no question they will generate revenue, because they are under a two percent property tax cap.”

Council members also expressed concern that they design of the multi-family units be “nicer” and “aesthetically pleasing and represent the City well.” Another Council member stated that “when he ran for office last year, the complaint he heard most from constituents was that there was too much multi-family housing going in.” When the developer returned to the Council with are more attractive design, the Council confirmed that the price of the apartments would be change before voting for approval.

The zoning restriction passed by the Council in 2013 limiting multi-family development to two-bedrooms or less, as well as the stated intent of the Council to limit development to two-bedrooms or less, has resulted in a significant struggle for families with three or more children in the area.

Minority populations living in Hamilton County, including the City of Noblesville, have a disproportionately greater need with housing problems, severe housing problems, and severe cost burdens. African-American and Hispanic households are the

primary racial groups with a disproportionate amount of these housing issues. African-American households are also disproportionately represented in subsidized housing when compared to their representation in the overall population in Hamilton County's housing market. The City of Noblesville's repeated failures to provide funding for affordable housing development and actions to block such development have a disproportionately discriminatory effect on African Americans, Hispanics, and families with children. The City's land use policies actually or predictably lead to a disparate impact on African Americans, Hispanics and families with children or create, increase, reinforce or perpetuate segregated housing patterns because of race, color, national origin, or familial status.

As a sub-recipient of CDBG funds, the City of Noblesville must comply with the requirements of the CDBG program, which includes acting in conformity with the requirements of the Fair Housing Act. As outlined above, the City of Noblesville has passed and continues to enforce zoning ordinances that specifically prohibit subsidized housing, which has made housing otherwise unavailable and is applying discriminatory terms and conditions to housing based upon a person's race, color, national origin or familial status.

9. The most recent date on which the alleged discrimination occurred:

July 9, 2013, and is continuing.

10. Types of Federal Funding Identified:

- CDBG

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

804a, 804a or b, 804b or f, and 804a/b or f of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Title VI of the Civil Rights Act of 1964

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.

 _____

Amy Nelson, Executive Director

6/21/2017 _____

Date

NOTE : HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.