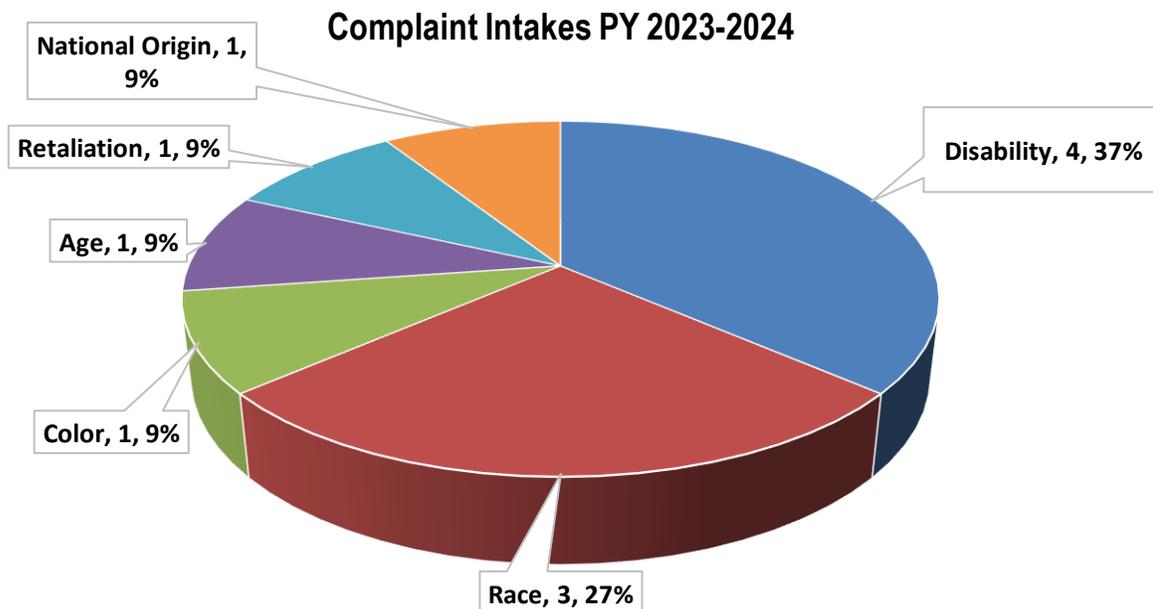


REPORT ON ACTIVITIES TO FURTHER FAIR HOUSING
(PY 2023-2024)

This Report for Fair Housing Services is submitted pursuant to the 2023-24 Community Development Block Grant subrecipient agreement between the City of Livonia and the Fair Housing Center of Metropolitan Detroit (“Fair Housing Center” or “Center”) for the period of July 1, 2023 to June 30, 2024 (PY 2023-24). The activities and services provided by the Fair Housing Center pursuant to Subrecipient Agreement assist residents of Livonia, housing providers located in Livonia, and persons and entities located outside of Livonia who are involved in the ownership, management, purchase, or rental of housing located in Livonia.

Intake, Investigations, and Enforcement

During PY 2023-24, the Fair Housing Center conducted the intake and investigations of 8 fair housing complaints and housing related inquiries.¹ Attachment 1, Intake and Enforcement Log Report – PY 2023-2024, details the complaints filed, the allegation types, race, sex, and income information of the complainants.



¹A complaint may contain multiple allegations.

The Center engaged in the following notable enforcement activities during PY 2023-24 that impact Livonia:

- **American Sign Language (ASL) Services (Assisted Living Facilities) – Trial and Appellate Litigation**

The Fair Housing Center is engaged in significant litigation involving ASL services at assisted living facilities. The Center conducted testing and performed additional work on these cases for several years. The testing involved numerous facilities located in Wayne, Oakland, and Macomb Counties.

Cooperating attorneys Andrew Rozynski and Reyna Lubin, from the New York City law firm of Eisenberg & Baum LLP, obtained 3 federal district court decisions involving American Sign Language (ASL) services as reasonable accommodations under the FHA. *FHCMD v. St.*

Elizabeth Briarbank, No. 21-12213 (E.D. Mich. Feb. 3, 2023); [*FHCMD v. American House Sr. Living*, No. 21-11061 \(E.D. Mich. Nov. 28, 2023\)](#), *appeal pending*, No. 23-2051 (6th Cir. Dec. 4, 2023) & FHCMD No. [*FHCMD v. Singh Sr. Living LLC*, No. 21-12212 \(E.D. Mich. Nov. 28, 2022\)](#), *appeal pending*, No. 23-3969 (6th Cir. Nov. 30, 2023). On November 30, 2023, the U.S. District Court for the Eastern District granted summary judgment in two ASL cases filed by the Center.



Attorneys Rozynski and Lubin, joined by their partner, David John Hommel, have briefed the cases on appeal before the Sixth Circuit Court of Appeals. The Center and its cooperating attorneys are asking the Sixth Circuit to articulate the appropriate standard for determining when a request for an ASL interpreter should be provided as a reasonable accommodation under the FHA.

ASL is commonly recognized as the 6th most common language in the U.S. As the Center's briefs on appeal note:

ASL interpreters are a common form of reasonable accommodation. To deny a deaf person an ASL interpreter, when ASL is their primary language, is akin to denying a Spanish interpreter to a person who speaks Spanish as their primary language. ASL is a visual, three-dimensional, non-linear language, and its grammar and syntax differ from the grammar and syntax of English and other spoken languages. In many cases, there is no one-to-one correspondence between signs in ASL and words in the English language.

U.S. v. UPS Supply Chain Sols., 620 F.3d 1103, 1105 (9th Cir. 2010)(cleaned up)(citations omitted).

<p>When are American Sign Language (ASL) services required in housing?</p>	<p>Importance of ASL Services ASL is the primary language for many deaf individuals in the U.S. Due to its common use, ASL is the sixth most common language used in the U.S. Lip reading is no substitute for ASL as only 20-30% of spoken English is visible on the lips.</p>
	<p>When are ASL services required in housing? Nursing homes, assisted living, and senior housing facilities that receive federal funds are subject to the ADA, the Rehabilitation Act of 1973, and the Patient Protection and Affordable Care Act (ACA). These laws require housing facilities to provide sign language interpreters or other assistive listening devices. Regardless of federal funding, these facilities are also required to provide ASL services and other assisted listening devices as a reasonable accommodation under the Fair Housing Act.</p>
<p>Do you have questions? Need training? Want to file a complaint? Please contact us.</p>	
 <p>www.FairHousingDetroit.org 313-579-FAIR</p>	

There are instances in which residents are unable to obtain adequate medical assistance and access to other critical services because they do not have access to ASL interpretation services, which they are or should be entitled to receive as a reasonable accommodation under the Fair Housing Act (FHA). These ASL cases are imperative, as the U.S. District Court’s decision, if permitted to stand, would essentially permit operators of assisted living facilities (and, potentially, nursing homes as well) to deny ASL services altogether by providing alternative, non-ASL

type services that are simply not effective alternatives for persons who communicate exclusively or primarily through ASL.

The appellate briefs may be accessed using the following links: [Appellant’s Brief, FHCMD v. American House Sr. Living, No. 23-2051 \(6th Cir. Jan. 23, 2024\)](#) & [Appellant’s Brief, FHCMD v. Singh Sr. Living LLC, No. 23-3969 \(6th Cir. Jan. 23, 2024\)](#).

- **American Sign Language (ASL) Services (Nursing Home Facilities) – Pending Litigation**

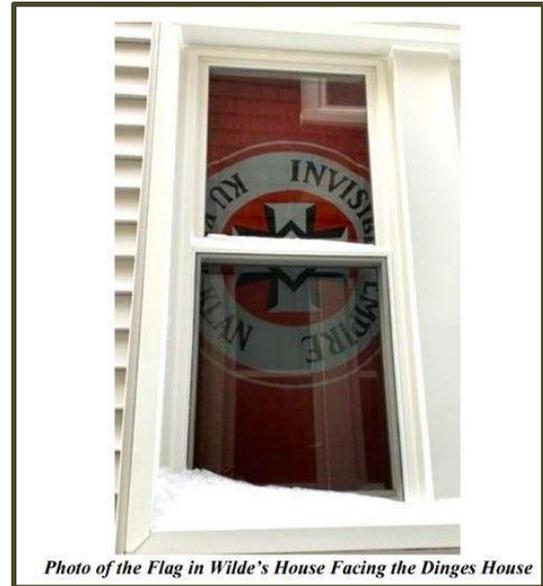
During PY 2023-24, the Fair Housing Center also completed a major systemic investigation of ASL services as to nursing home facilities. Initial testing began at a total of 60 facilities. As with the prior testing, the testing of nursing homes involve facilities located in Wayne, Oakland, and Macomb Counties. Of the 60 nursing home facilities, less than a third were found to be in compliance with ASL requirements. A series of recorded, follow up testing was then conducted. This testing showed approximately 40 remaining facilities were not in compliance with ASL requirements.

The testing data has been summarized and forwarded to counsel for evaluation and initiation of federal court litigation.

- **Race Discrimination (KKK Flag Case)**

Je Donna Dinges and her family had lived in their Grosse Pointe Park home since 2011. Ms. Dinges is a hardworking, small business owner. In 2017, defendant Ryan Wilde moved next door to Ms. Dinges. A narrow, 5-foot walkway separates the two homes. From approximately December 2017 until April 2021, Mr. Wilde engaged in or permitted the following acts of racial intimidation against Ms. Dinges and her family:

- ✓ Hanging a “Ku Klux Klan Invisible Empire” flag in a window visible only to Ms. Dinges and her family;
- ✓ Placing a full gas can in the Dinges' recycling bin;
- ✓ Discharging a gun on multiple occasions in the middle of the night from his back porch;
- ✓ Preventing Ms. Dinges from entering the shared walkway between his home and hers, while staring at her in an intimidating fashion; and
- ✓ Throwing garbage in front of the Dinges' home.



Ultimately, the incidents forced Ms. Dinges and her family in December 2021 to move out of their home. The Center, after completing an investigation and analysis of the complaint, the made a referral to the Civil Rights Litigation Initiative (CRLI) at the University of Michigan Law School.

Professor Michael Steinberg and his team of CRLI student attorneys have provided effective representation in fair housing cases for several years. Professor Steinberg and CRLI student attorneys Anna Silk and Sarah Hall filed a federal court complaint on behalf of Ms. Dinges and her daughter, India. Notably, the complaint includes a potentially precedent setting claim under Michigan’s Ethnic Intimidation Act, M.C.L. § 750.147b, which provides for the greater of “3 times the actual damages . . . or \$2,000”. [Federal Court Complaint, Dinges v. Wilde, No. 23-12885 \(E.D. Mich. Nov. 14, 2023\)](#); [Black Woman and Her Daughter Sue Former White Neighbor for KKK Flag Display and Other Threats](#). The case has been assigned to U.S. District Court Judge Linda V. Parker.

In October 2023, the Center sponsored CRLI student attorneys Silk and Hall, along with the Center’s other cooperating attorneys, to attend a Fair Housing Breakfast featuring leading fair housing attorney, John Relman, of [Relman Colfax PLLC](#). In this picture, Ms. Silk and Ms. Hall are shown speaking with Mr. Relman.



- **Race Discrimination (Overbroad Criminal Record Policies)**

The complainant was approved for a rental unit based on his income and credit but denied rental solely due to a blanket criminal record policy. During a telephone discussion with the complainant, the property manager stated, among other things:

- ✓ “once we know [about an applicant’s criminal history] we can’t unknow and that’s the part where we can get legally in trouble if we were to accept another person or deny another person we would now be considered inconsistent and that is where we have problems with the law”;
- ✓ “we can’t use discretion; fair housing puts a line in the sand and that way no one gets discriminated against because or special favor because of anything particular”;
- ✓ “we equally have to basically say ‘yes [or] no’, we can’t put start weighing things at all. . . . we have to have a strong line in the sand and that’s how real estate works. . . . but fair housing, this is law”;
- ✓ “that’s not something that we are allowed to use discretion with whatsoever; “it has to be very firm and very strict otherwise, imagine all the people we said no to in the past”



The complainant and the Center, through counsel, filed a complaint against an apartment complex based on a strict, no exceptions criminal record policy. The complainant recorded his interactions with the manager of the apartment complex ([4-minute audio file](#)).

As HUD Office of General Counsel’s (OGC) guidance makes clear, such blanket criminal record policies are unlawful as they fail to “accurately distinguishes between criminal conduct that indicates a demonstrable risk to resident safety and/or property and criminal conduct that does not”. [HUD’s Office of General Counsel’s policy statement entitled “Application of Fair Housing Act Standards to the Use of Criminal Records” \(April 4, 2016\)](#).

The case resulted in a favorable decision upholding the sufficiency of the complaint challenging the overbroad and discriminatory criminal record policy. Opinion and Order Denying Motion to Dismiss, *Lyman & FHCMD v. Montclair at Partridge Creek, LLC*, No. 23-10131 (E.D. Mich. Sept. 18, 2023).

Significantly, more recent guidance on the use of criminal record are found in the [HUD Memorandum, Implementation of OGC Guidance on Application of FHA Standards to the Use of Criminal Records \(June 10, 2022\)](#) and [HUD’s Notice of Proposed Rule, Reducing Barriers to HUD-Assisted Housing”, 89 Fed. Reg. 25332 \(Apr. 10, 2024\)](#). This recent guidance and proposed rulemaking should be carefully considered by every housing provider to ensure compliance with the latest standards as to use of criminal records in housing. The Center is available to provide training and compliance guidance on the use of criminal records and other policies affecting residential housing.



Pursuant to the Subrecipient Agreement, the Center provides fair housing intake and investigations at a rate of \$600 for a total of \$4,800 (8 x \$600).

Fair Housing Testing

Testing occurs depending upon whether the allegations in the complaint or the housing practices at issue are susceptible to testing. For example, testing is generally ineffective as to eviction complaints, as only existing tenants are subject to eviction. Complaints involving the availability of housing, on the other hand, are examples of the kinds of situations that can be effectively tested. The Center conducts systemic and complaint-based testing.

During PY 2023-24, the Fair Housing Center conducted 24 complaint-based tests and systemic tests:

**Summary of Tests
 7/1/2023 – 6/30/2024**

No.	Protected Class	Date	Type	Evidence	Inconclusive	No Difference
1.	Race - Criminal Background	1/4/2024 1/8/2024 1/16/2024	Phone - Single		X	
2.	Race - Criminal Background	1/28/2024 1/29/2024	Phone - Single		X	
3.	Race - Criminal Background	1/28/2024 1/29/2024	Phone - Single		X	
4.	Race - Criminal Background	6/6/2024	Phone - Single			X
5.	Race - Criminal Background	6/11/2024	Phone - Single		X	
6.	Disability - Physical - Service Animal	6/5/2024	Phone - Single			X
7.	Disability - Physical - Service Animal	6/6/2024	Phone - Single			X
8.	Disability - Physical - Service Animal	6/10/2024	Phone - Single			X
9.	Disability - Physical - Service Animal	6/3/2024 6/13/2024 6/24/2024 6/29/2024	Phone - Single Site - Single			X
10.	Disability - Physical - Service Animal	6/3/2024 6/13/2024 6/24/2024 6/29/2024	Phone - Single Site - Single		X	



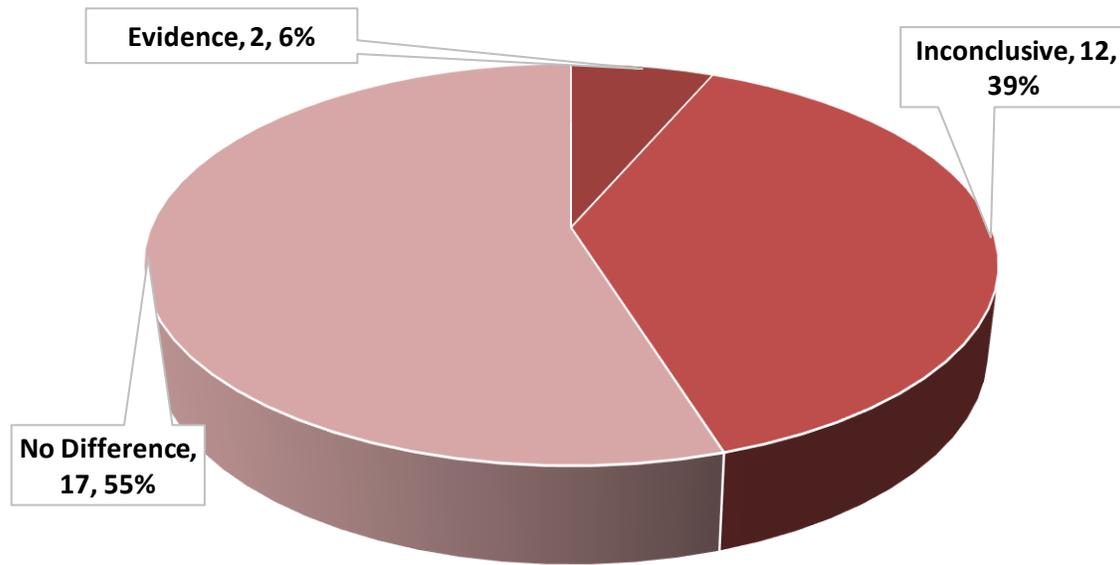
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11.	Disability - Physical - Service Animal	6/4/2024 6/13/2024 6/24/2024 6/29/2024	Phone - Single Site - Single	X		
12.	Disability - Mental - Service Animal	1/3/2024	Phone - Single			X
13.	Disability - Mental - Service Animal	6/3/2024 6/13/2024	Phone - Single			X
14.	Disability - Mental - Service Animal	6/6/2024	Phone - Single			X
15.	Disability - Mental - Service Animal	6/7/2024	Phone - Single			X
16.	Familial Status- Occupancy Standards	1/30/2024 2/1/2024	Phone - Single			X
17.	Familial Status- Occupancy Standards	1/30/2024 2/1/2024	Phone - Single			X
18.	Familial Status- Occupancy Standards	5/31/2024	Phone - Single			X
19.	Familial Status- Occupancy Standards	5/31/2024	Phone - Single			X
20.	Sex	6/5/2024	Phone - Single		X	
21.	Sex	6/6/2024	Phone - Single			X
22.	Nation Origin	6/18/2024	Phone - Single			X
23.	Nation Origin	6/18/2024	Phone - Single			X
24.	Nation Origin	6/18/2024	Phone - Single			X
Total	24			1	6	17

Fair Housing Testing Results - PY 2023-24



As to charges for testing, the Fair Housing Center conducted 24 telephone tests (single tester) at \$300 per test, for a total of \$12,000 for fair housing testing. The Center’s charges for testing are capped at \$1,200 to remain at the \$6,000 grant amount.

Fair Housing YouTube Videos

Under a separate grant—though beneficial to the Center’s work in under this sub-CDBG grant—the Center has conducted numerous fair housing webinars. Videos of the webinars have been posted on Center’s YouTube page and have received over 4,000 views. These webinars include:

- “You Can Protect Yourself: Knowing Your Rights as a Tenant in Michigan”;
- “Damages in Fair Housing Cases - What is the case worth? What damages can be awarded?”;
- “Disparate Impact Discrimination: What It is and Why It Matters to Each Resident and Housing Provider”;
- “National Origin Discrimination & Limited English Proficiency (LEP)”;
- “Mortgage Lending Discrimination – Nuts and Bolts of a Successful Discrimination Claim”;
- “Source of Income – Overdue Protections for Voucher Holders and Purchasers with FHA and VA Loans”;
- “Combatting Steering in the Homebuying Process: Where You Live Should be Your Choice”;



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- “Discriminatory Appraisals - Combatting Undervalued Homes in Minority Communities”;
- “Fair Housing: What Can and Cannot be Asked of Housing Applicants & Current Residents?”;
- “The Fair Housing Applies to Cities, Villages and Townships: Zoning & Land Use”; and
- “Wrongful Evictions: Recognizing Fair Housing Violations Underlying Eviction Filings and How to Assert Fair Housing Claims”.

Two videos, entitled “You Can Protect Yourself: Knowing Your Rights as a Tenant in Michigan” and “Damages in Fair Housing Cases - What is the case worth? What damages can be awarded?”, have approximately 2.9k and 2.1k views.

Other completed or upcoming webinars include:

- “Unlawful Lockouts: Violations and Remedies”;
- “Affirmative Marketing for Developers (joint webinar with the Fair Housing Center of West Michigan)”;
- “Who Can Be Liable for a Fair Housing Violation? The Nuts and Bolts for Identifying Responsible Parties”;
- “Sexual Harassment and Domestic Violence in Housing: Quid Pro Quo and Hostile Environment Harassment, HUD’s Equal Access Rule, VAWA, and Early Lease Terminations”;
- “Medical Marijuana & Fair Housing”;
- “Veterans’ Preferences & Fair Housing”;
- “Hoarding Disorders & Fair Housing”;
- “Criminal Record Training for Housing Providers – Best Practices for Tenant Selection & Tenant Termination”;
- “Residential Appraisals/Fair Lending - Best Practices for Developing a Reconsideration of Value or “ROV” Policy”; and
- “Home Purchase Fraud Prevention – Pros and Cons of “Lease-to-Own”, “Contract for Deed”, “Sale and Leaseback”, Land Contracts, and Other Home Purchase Arrangements”.

Fair Housing Trainings & Education

As set forth on Attachment 2, Fair Housing Trainings - PY 2023-24, the Fair Housing Center conducted 47 fair housing training and education events during PY 2023-24.

At the national level, the Center’s executive director participated in HUD’s 2023 Fair Housing Leadership Conference in Denver, Colorado (August 2023). The presentation, entitled “[Fair Housing Enforcement & Conciliation: Recent Additions to Our Fair Housing Toolkits](#)”, discussed current fair housing developments, including the state enactments of the CROWN Act; common source of income violations; protections; model housing policies pertaining to national origin and criminal record (race) discrimination; and recent damage awards in administrative proceedings.

The Center also presented at fair housing conferences in Maine (May 2024), Indiana (April 2024), and Kansas (April 2024).

At the state level, the Center made two presentations at the Michigan Department of Civil Rights Fair Housing Summit (June 2024), addressing disparate impact discrimination in the context of eviction policies and practices and legal updates (national and statewide). The legal updates presentation set forth specific suggestions for strengthening Michigan’s fair housing laws and enforcement provisions.

At the state level, the Center also presented on a panel at the Michigan Building Michigan Communities Conference (May 2024), concerning the newly released 2024 Michigan Statewide Housing Needs Assessment. The Center analyzed the fair housing impacts or implications of the assessment as to future state and local housing planning.

Oakland County trainings included the Oakland Livingston Human Service Agency (OLHSA) (July 2023), the Alliance for Housing “Landlord Lunch & Learn” event (September 2023), and the Oakland County Real Estate Investors (November 2023). Wayne County presentations included the Detroit Realist Association (April 2023) and the Western Wayne NAACP (September 2023). St. Clair County trainings included fair housing training to tenants and non-profit organizations in Port Huron (April 2024).

The Center also presented at the impactful “Accessible Housing Learning Series” sponsored by the City of Detroit’s Housing and Revitalization Department and Detroit Disability Power (June 2024). The Center also resumed its in person presentations for noted Wayne State University Law Professor John Mogk in his Urban Planning Seminar (October 2023), seeking to inspire the next generation of attorney to further fair housing and civil rights.



The poster for the "Fair Housing Legal Update" event features a blue background with a white silhouette of a city skyline at the bottom. At the top left, there are logos for HUD, the National Fair Housing Alliance, and the Fair Housing Center of Metropolitan Detroit. The main title "Fair Housing Legal Update" is in large white font. Below it, the moderator is listed as "Moderated by: Sasha Samberg-Champion, OGC". The date and time are "Day 1, August 30, 2023" and "4:35 – 6:00 PM MDT". A "Speakers" section at the bottom displays four speaker portraits with their names and titles: Reed Cofax (Partner, Robinson Silverstein & Associates), Thomas Silverstein (Associate Director, Fair Housing & Community Development, Board Member, Committee on Civil Rights, Governor's Law), Steve Tomkowiak (Executive Director, Fair Housing Center of Metropolitan Detroit, OGC), and Timothy Moran (Director, Office of Developmental Public Civil Rights, Director, Michigan Civil Enforcement Division).

The Center also continued to train large and small housing providers, including McKinley Properties (December 2023 and January 2024) and DHS Management (October 2023). Also, the Center participated in several meetings and at a quarterly meeting with the Detroit Metropolitan Apartment Association (July 2023). The purpose was to "Establish Common Ground" between fair housing organizations and property management professionals, including discussions and reaching common ground on assistance animals, source of income protections, and criminal background requirements.

Finally, the Center continues to make monthly fair lending presentations to the Southwest Economic Solutions (SEC) and NID Housing Counseling Agency's (NID) new homebuyers' course, alerting participants to fair housing and fair lending issues that can arise in the home purchase process. Pictured on the right are Hector Hernandez, Executive Director of SES, and Renae Johnson, Realtist and HUD Housing Counselor with NID. Hector and Renae opened the doors for Center's fair lending presentations before the monthly new homebuyers' classes.



The Center believes that these webinars and trainings benefit residents of Livonia and persons seeking to live in Livonia. The webinars and trainings are also intended to provide needed guidance for housing providers involved in ownership and management of residential properties in Livonia.

The Fair Housing Center is not charging for fair housing training and education.

Fair Housing Advertising & Community Outreach

The Fair Housing Center also distributed over 5,000 fair housing brochures in Wayne, Oakland, and Macomb Counties. The brochures, which are printed in English, Arabic, and Spanish, are provided free of charge.

The Fair Housing also ran a yearlong advertisement in the *Urban Aging News*. The *Urban Aging News* also ran an article authored by the Center, entitled, "Fair and Accessible Housing: Laws that Protect the Disabled" (pictured on the right).

Fair and Accessible Housing: Laws that Protect the Disabled

By Steve Tomkowiak, Executive Director, Fair Housing Center of Metropolitan Detroit



What is the definition of disability under the fair housing laws?

There is a full range of laws to protect the disabled, providing guidelines and resources to ensure their in-home safety and access to fair housing.

It has been estimated that at least one out of every six persons is disabled. Whether through aging, illness, injury, or other life events, almost everyone at some point in their life will have a disability. The Fair Housing Act and Michigan Persons With Disabilities Civil Rights Act define "disability" as a physical or mental impairment that substantially limits one or more of a person's major life activities, such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working. The definition also includes persons with a record of such an impairment or who are regarded as having such an impairment when they do not.

Landlords, property owners, and condominium, cooperative and homeowners' associations are prohibited under the FHA and PWODCSA from discriminating against persons with disabilities.

What is a reasonable accommodation?

A "reasonable accommodation" or "RA" is an exception or adjustment to a rule, policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and

enjoy a dwelling. Examples include:

- Creating a reserved parking spot for a resident with a mobility impairment near their unit
- Granting a transfer to a first floor or a more accessible unit
- Allowing an assistance animal despite a "no pets" policy
- Not charging pet fees for an assistance animal
- Providing a lease application in large print
- Permitting a live-in aide

What is a reasonable modification?

A "reasonable modification" or "RM" is a structural change made to existing premises occupied or to be occupied by a person with a disability, so that he or she can fully use and enjoy the premises. Reasonable modifications involve structural changes to interiors and exteriors of dwellings, as well as to the common and public use areas.

Examples include:

- Installing an accessible ramp at the entrance to a dwelling
- Installing visual or tactile alert devices
- Widening doorways
- Replacing door handles with levers
- Installing grab bars in a bathroom or entrance to a unit
- Removing below-counter cabinets or lowering counter spaces

Who pays for a RM?

The resident must pay for the RM. If the housing provider receives federal financial assistance, such as for subsidized housing, the housing provider may be required to pay for the RM under Section 504 of the Rehabilitation Act of 1973.

Can a housing provider deny a RA or RM request?

Yes. A RA or RM request may be denied if the request would impose an undue financial and administrative burden on the housing provider

or would fundamentally alter the nature of the provider's operations, determined on a case-by-case basis. If a housing provider believes that the requested accommodation is not reasonable, the provider should discuss whether there is an alternative accommodation that would effectively address the requester's disability-related needs.

May the housing provider ask for details or proof of disability?

The housing provider may ask for verification only if the disability is not obvious or otherwise known to the housing provider. The housing provider may verify that a request is related to that disability. If requested, the individual may provide a written statement from a licensed medical or social service professional or other third party stating that the applicant/resident qualifies as a person with a disability.

Can a RA or RM be refused because the provider believes the disabled person will not be safe or cannot take care of themselves?

No. The only exception, which applies to all applicants, is if an individual's tenancy poses a direct threat to the health or safety of others or would result in physical damage to the property of others, with no available accommodation that can significantly reduce or eliminate the threat.

Where is additional information available?

The Fair Housing Center assists residents of Wayne, Oakland and Macomb Counties free of charge with RA and RM requests and other housing-related matters. For more information, visit www.fairhousingdetroit.org or call 313.579.FAIR(3247).



FAIRHOUSING
CENTER OF METROPOLITAN DETROIT

Issue 21 | Winter 2022 Urban Aging News.com

The Center continued to place fair housing advertisements in the Michigan Chronicle. The Center also continued to run advertisements in the bilingual *La Prensa* weekly newspaper. *La Prensa* is the largest weekly Latino newspaper in Michigan and Ohio.



The Fair Housing Center continued its community outreach activities. Led again by the Center’s Board Chairperson Karlyne Tucker Scaggs, the [Center in April 2024 held its third annual Fair Housing Bikeathon](#). The event has grown from 40 to over 60 and, this year, over 100 participants.

Stops on the trail this year included the Virginia Park Community Shopping Plaza, one of the first minority owned and built shopping centers in the nation & first Farmer Jack in Detroit, the Raymond and Rosa Parks Flat, the Shrine of the Black Madonna, King Solomon Baptist Church, and the Detroit Association of Women’s Club.

Attendees came from throughout the Metropolitan Detroit community. As in the first two years, the bikeathon included a raffle, in which many participants received valuable biking merchandise. Plans for next year’s bikeathon already include the giveaway of two brand new bikes.

The Fair Housing Center is not charging Livonia for fair housing advertising and community outreach.





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Conclusion

The Center, on behalf of its Board of Directors and staff, expresses its appreciation for the opportunity to work on behalf of Livonia on fair housing activities during PY 2023-24.

Please call or write if you have any questions or comments or if you need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Tomkowiak", is written in a cursive style.

Steve Tomkowiak
Executive Director



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INDEX OF ATTACHMENTS

<i>Attachment No.</i>	<i>Description</i>
1	Intake and Enforcement Log Report - PY 2023-24
2	Fair Housing Trainings - PY 2023-24

ATTACHMENT 1

Intake and Enforcement Log Report PY 2023-2024

Intake No.	Date	Description of Complainant	Discrimination Type	Allegation Types	Initial Investigation	Referral Source	Income Source	Transaction Type	Property Type	Respondent Characteristics
23-181	07/14/2023	Single, Black or African American, Female, Potential Tenant	Race, Color	Refusal to Sell or Rent or to Negotiate as to Sale or Rental Based on Protected Class Status	Pending - Awaiting Testing (Housing Currently Not on the Market)	Another Agency	Unemployed	Rental	5 and Above Multi-Family Housing	
23-184	07/19/2023	Single, American Indian or Alaska Native, Male, Condominium Unit Owner	Retaliation	Difference in Services Provided by Agent or Owner Based on Protected Class Status	Advised/Informed of Fair Housing Rights	Prior Complaint	SSDI	Condominium Unit - Ownership	Condominium	
23-190	10/05/2023	Married, White, Female, Tenant	Age, Disability - Physical, Disability - Mental	Refusal to Transmit an Offer Based on Protected Class Status	Closed - Insufficient Evidence to Proceed with Fair Housing Claim(s)	Online	Unemployed	Rental	1 Single-Family Housing	
23-193	07/31/2023	Widowed, White, Female, Tenant	National Origin	Refusal to Transmit an Offer Based on Protected Class Status	Advised/Informed of Fair Housing Rights	Another Agency	Unemployed	Rental	5 and Above Multi-Family Housing	
23-234	09/22/2023	Single, Black or African American, Female, Tenant	Disability - Mental	Refusal to Grant Reasonable Accommodation	Reasonable Accommodation Granted	Another Agency	SSDI + Pension	Rental	5 and Above Multi-Family Housing	
24-027	02/27/2024	Single, White, Female, Potential Tenant	Race	Difference in Services Provided by Agent or Owner Based on Protected Class Status, Statement of Discriminatory Intent or Preference	Pending - Awaiting Testing	Prior Complaint	Unemployed	Rental	5 and Above Multi-Family Housing	
24-028	02/20/2024	Single, White, Male, Tenant	Disability - Physical	Refusal to Grant Reasonable Accommodation	Closed - Insufficient Evidence to Proceed with Fair Housing Claim(s)	Online	SSDI	Rental	Other	
24-064	04/19/2024	Single, Black or African American, Female, Tenant	Race	Difference in Services Provided by Agent or Owner Based on Protected Class Status	No Contact After 10-Day Letter - Administrative Closure	Online	Pension	Rental	5 and Above Multi-Family Housing	

ATTACHMENT 2

Fair Housing Trainings
PY 2023-2024

Fair Housing Trainings - PY 2023-2024
Fair Housing Center of Metropolitan Detroit

Recipient(s)	Date	Duration	Location	Participants	Training Topics
1st Quarter (July-September 2023)					
Beanstalk Property Solutions	7/11/23	3 hours	In Person	Approx. 25	General fair housing training for management of residential and commercial properties, and completion of detailed Fair Housing Quiz.
Ellis Manor	7/12/23	3 hours	In Person	8	General fair housing training and completion of detailed Fair Housing Quiz.
MiSide Homeownership Assistance Team	7/14/23	1 hour	Virtual Event/Zoom	Approx. 20	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
NID-HCA Homebuyer Education Workshop	7/15/23	30 minutes	Virtual Event/Zoom	Approx. 10	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
DHS Management (Sr. Staff)	7/19/23	3 hours	In Person	Approx. 40	General fair housing training and completion of detailed Fair Housing Quiz.
Detroit Metropolitan Apartment Association	7/20/22	1 hour	In Person	Approx. 75	"Establishing Common Ground" between Fair Housing Organizations and Property Management Professionals, including discussions and reaching common ground on assistance animals, source of income protections, and criminal background requirements.
Oakland Livingstone Human Service Agency (OLSHA)	7/20/23	1 1/2 hours	Virtual Event/Zoom	Approx. 500	Presentation/overview on a variety of fair housing topics, including: major fair housing laws and protected classes; responsible parties for fair housing violations; reasonable accommodations and modifications; assistance animals; permissible and impermissible applicant inquiry questions; sex discrimination; and national origin discrimination.
MiSide Homeownership Assistance Team	8/4/23	1 hour	Virtual Event/Microsoft Teams	Approx. 20	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
NID-HCA Homebuyer Education Workshop	8/12/23	30 minutes	Virtual Event/Zoom	Approx. 10	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.

HUD Leadership Conference (Denver, CO)	8/30/23	20 minutes	In Person	Approx. 500	Presented legal updates on the following six topics: (i) Race Discrimination – CROWN Act; (ii) Source of Income - Protections & Identifying Violations; (iii) National Origin Discrimination - Model Policy; (iv) Use of Criminal Records (Race & National Origin Discrimination) - Model Policies; (v) Reasonable Accommodations & Modifications – Identifying Clear Cut Violations in a Case-By-Case World; and (vi) Recent Damage Awards in Administrative Proceedings – Good News for the Many Complainants Who Cannot Obtain Counsel to File Fair Housing Claims in Court.
Alliance for Housing "Landlord Lunch & Learn"	9/6/23	2 hours	Virtual Event/Zoom	Approx. 30	Major fair housing laws and protected classes; responsible parties for fair housing violations; reasonable accommodations and modifications; assistance animals; permissible and impermissible applicant inquiry questions; sex discrimination; national origin discrimination; and current topics (medical marijuana and hoarding).
Western Wayne NAACP (Detroit)	9/20/23	45 minutes	In Person	Approx. 500	Fair lending presentation, including the importance of home ownership; disparities in homeownership rates; disparities in net worth by race; disparities in the participation in the residential mortgage market, originations, denials, and subprime indicators; disparities in valuations of homes in minority and non-minority communities; fair lending laws; and legal theories of liability in lending discrimination claims; and examples of discrimination in lending and investigation techniques.
Western Wayne NAACP (Inkster)	9/30/23	45 minutes	Recorded Presentation	Unknown	Fair lending presentation, including the importance of home ownership; disparities in homeownership rates; disparities in net worth by race; disparities in the participation in the residential mortgage market, originations, denials, and subprime indicators; disparities in valuations of homes in minority and non-minority communities; fair lending laws; and legal theories of liability in lending discrimination claims; and examples of discrimination in lending and investigation techniques.

2nd Quarter (October-December 2023)

Wayne State University Law School's Urban Planning Seminar	10/11/23	1 & 1/4 hours	FHCMD Office, Detroit, MI	Approx. 30	Introduction to the Fair Housing Center of Metropolitan Detroit; Program Activities, including Fair Housing Training & Education, Fair Housing Brochures, Advertising & Billboards, Community Outreach, Complaints and Enforcement, Fair Housing Advocacy, and Cooperating Attorney Program; Grants; Overview of Fair Housing Testing; Complaint Intake & Investigation, including Summary of Intake Process (fair housing complaints and housing related inquiries) and Complaint Investigation & Reasonable Accommodation and Modification Requests.
MiSide Homeownership Assistance Team	10/13/23	1 hour	Virtual Event/Microsoft Teams	Approx. 10	Fair Lending including major fair lending laws, disparate treatment discrimination (“traditional”, “redlining” and “reverse redlining”), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
George W. Crockett, Jr. Community Law School	10/14/23	45 minutes	In Person & Virtual Event	Approx. 50	Presentation/overview on a variety of fair housing topics, including: major fair housing laws and protected classes; disability protections, including reasonable accommodations and modifications, and assistance animals; and overview of lending HMDA data.
NID-HCA Homebuyer Education Workshop	10/14/23	30 minutes	Virtual Event/Zoom	Approx. 10	Fair Lending including major fair lending laws, disparate treatment discrimination (“traditional”, “redlining” and “reverse redlining”), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.

17th Annual Lakeshore Fair Housing Breakfast	10/18/23	1 hour	In Person, Hudsonville, MI	Approx. 100	Keynote Speaker, addressing I. Home Ownership & Lending Discrimination; II. Need for Fully Effective Source of Income Protection; and III. Deficiencies in Fair Housing Administrative Process. Also, extensive Q&A, including buyer "love letters", how to assist rental clients facing unnecessarily high credit score requirements and clients with prior evictions, use of non-predatory land contracts, effective tips for successfully bringing fair lending and fair housing claims, and ways to address the lack of affordable housing.
DHS Management	10/19/23	6 hours (two groups - 3 hours in morning session and 3 hours in afternoon session)	Berkley, MI	Approx. 100	General fair housing training for management and staff of large property management company. Completion and discussion of a Fair Housing Quiz addressing a host of common fair housing questions and issues. Also, reviewed the "Fair Housing Cheat Sheet", which lists the sources for answers to important fair housing questions and compliance.
Inkster Housing Commission	10/25/23				General fair housing training for management and staff of large property management company. Completion and discussion of a Fair Housing Quiz addressing a host of common fair housing questions and issues. Also, reviewed the "Fair Housing Cheat Sheet", which lists the sources for answers to important fair housing questions and compliance.
Oakland County Real Estate Investors Meeting	11/9/23	2 hours	In Person, Troy, MI	Approx. 60	Fair housing training focusing on the fair housing laws & protected classes; disability protections, including reasonable accommodations and modifications; and lengthy discussion of assistance animals and criminal record policies.
MiSide Homeownership Assistance Team	10/10/23	1 hour	Virtual Event/Microsoft Teams	Approx. 10	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
Bowers Realty "Homearama"	11/11/23	30 minutes	In Person, Detroit, MI	Approx. 100	Presentation at a Detroit "Homearama" event, addressing homeownership and fair housing. Presentation included brief overview of fair housing/fair lending enforcement process and discussion concerning the importance of home ownership; persistent disparities in home ownership rates; fair housing & buyer "Love Letters"; and how to prove lending discrimination (testing and comparable loan file evidence).
MiSide Homeownership Assistance Team	12/8/23	1 hour	Virtual Event/Microsoft Teams	Approx. 10	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
McKinley Properties	12/19/23	6 hours (two groups - 3 hours in morning session and 3 hours in afternoon session)	Ann Arbor, MI	Approx. 100	Fair Housing Training Topics included: Overview of Fair Housing Laws & Protected Classes; Disability Protections & Reasonable Accommodations and Modifications; Assistance Animals; Current Topics (Covid-19 and FAQs, Medical Marijuana, and Hoarding); Applicant Inquiries; National Origin & Limited English Proficiency; Disparate Impact and se of Criminal Records and Familial Status & Occupancy Standards.
3rd Quarter (January-March 2024)					
McKinley Properties	1/10/24	6 hours (two groups - 3 hours in morning session and 3 hours in afternoon session)	Taylor, MI	Approx. 40	Fair Housing Training Topics included: Overview of Fair Housing Laws & Protected Classes; Disability Protections & Reasonable Accommodations and Modifications; Assistance Animals; Current Topics (Covid-19 and FAQs, Medical Marijuana, and Hoarding); Applicant Inquiries; National Origin & Limited English Proficiency; Disparate Impact and se of Criminal Records and Familial Status & Occupancy Standards.

MiSide Homeownership Assistance Team	1/12/24	30 minutes	Virtual Event/Microsoft Teams	Approx. 20	Fair Lending including major fair lending laws, disparate treatment discrimination (“traditional”, “redlining” and “reverse redlining”), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
NID-HCA Homebuyer Education Workshop	1/13/24	30 minutes	Virtual Event/Microsoft Teams	Approx. 15	Fair Lending including major fair lending laws, disparate treatment discrimination (“traditional”, “redlining” and “reverse redlining”), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
MiSide Homeownership Assistance Team	2/9/24	30 minutes	Virtual Event/Microsoft Teams	Approx. 20	Fair Lending including major fair lending laws, disparate treatment discrimination (“traditional”, “redlining” and “reverse redlining”), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
MiSide Homeownership Assistance Team	3/8/24	30 minutes	Virtual Event/Microsoft Teams	Approx. 20	Fair Lending including major fair lending laws, disparate treatment discrimination (“traditional”, “redlining” and “reverse redlining”), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
NID-HCA Homebuyer Education Workshop	3/9/24	30 minutes	Detroit, MI	Approx. 15	Fair Lending including major fair lending laws, disparate treatment discrimination (“traditional”, “redlining” and “reverse redlining”), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.

4th Quarter (April - June 2024)

City of Port Huron	4/9/24	3 hours	Port Huron, MI	Approx. 60	Introduction; Overview of Major Fair Housing Laws & Protected Classes; Hoarding & Fair Housing; Wrongful Evictions; Michigan’s Anti-Lockout Statute, MCL § 600.2918; Fair Housing & Criminal Records; and Medical Marijuana.
Detroit Realist Association	4/11/24	30 minutes	Detroit, MI	Approx. 20	Fair Lending and Appraisal Practices
MiSide Homeownership Assistance Team	4/12/24	30 minutes	Virtual Event/Microsoft Teams	Approx. 20	Fair Lending including major fair lending laws, disparate treatment discrimination (“traditional”, “redlining” and “reverse redlining”), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
Evansville, IN	4/16/24	1 hour 30 minutes	Evansville, IN	Approx. 75	Prohibition on blanket inquiries; understanding of HUD’s Regulation, 24 CFR 100.20(c), that addresses permissible and impermissible inquiries of applicants; permissible set asides or preferences for persons with disabilities; unlawful screening practices; policies that questions applicants as to their race or other protected class categories; and sample case studies. Also, discussion as best practices regarding criminal record policies and requests for accommodations.
Gray Panthers of Metro Detroit	4/20/24	30 minutes	Virtual Event/Microsoft Teams	Approx. 10	Introduction; Overview of Major Fair Housing Laws & Protected Classes; Familial Status Discrimination; Wrongful Evictions; and Needs of Aging Population.

City of Salina	4/26/24	2 hours	Salina, KS	Approx. 100	2 Presentations: Mortgage Lending Discrimination and Appraisal Discrimination. As to mortgage lending discrimination: review of the residential mortgage lending process, including the various roles of the secondary market, mortgage brokers and private investors in residential mortgage lending; defining lending discrimination; review and analysis of laws that prohibit lending discrimination; discussion of legal theories (direct evidence, circumstantial evidence, and disparate impact) that apply to lending discrimination cases; prima facie elements applicable to various lending discrimination claims, and to redlining and reverse redlining claims; analysis of HMDA Reports and "loan level data" to identify potentially comparable loan files; analysis of comparable loan files; and conciliation/resolution of complaints of lending discrimination. As to appraisal discrimination, importance of home ownership; under valuation of homes in minority communities; racial bias driving a portion of the under valuation of homes; major laws applicable to appraisal discrimination cases; theories of liability applicable to appraisal discrimination cases (disparate treatment and disparate impact); and identifying comparable files to establish instances of residential appraisal discrimination.
Maine Human Rights Division	5/1/24	30 minutes	Virtual Event/Zoom	Approx. 50	Discussion of discrimination in the appraisal process, including importance of home ownership; under valuation of homes in minority communities; racial bias driving a portion of the under valuation of homes; major laws applicable to appraisal discrimination cases; theories of liability applicable to appraisal discrimination cases (disparate treatment and disparate impact); and identifying comparable files to establish instances of residential appraisal discrimination.
MiSide Homeownership Assistance Team	5/10/24	30 minutes	Virtual Event/Microsoft Teams	Approx. 20	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
NID-HCA Homebuyer Education Workshop	5/11/24	30 minutes	Detroit, MI	Approx. 10	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
Michigan Building Michigan Communities Conference	5/14/24	30 minutes	Lansing, MI	Approx. 75	Participated in a panel discussion on the 2024 Michigan Statewide Housing Needs Assessment; analyzed same as to fair housing concerns.
Premier Property Management	5/17/24	3 hours	Milford, MI	Approx. 80	General fair housing training and completion of detailed Fair Housing Quiz.
NAACP Western Wayne Home Buyers' Workshop	5/18/24	20 minutes	Inkster, MI	Approx. 5	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
Michigan Department of Civil Rights Fair Housing Summit	6/12/24	Approx. 2 hours	Detroit, MI	Approx. 100	Presentations on two topics: Disparate impact in the context of eviction policies and practices; and legal updates (national and statewide) and suggestions for strengthening Michigan's fair housing laws and enforcement provisions. Also participated in Q&A sessions.

MiSide Homeownership Assistance Team	6/14/24	30 minutes	Virtual Event/Microsoft Teams	Approx. 20	Fair Lending including major fair lending laws, disparate treatment discrimination ("traditional", "redlining" and "reverse redlining"), disparate impact, including minimum loan policies, insurance redlining practices, real estate steering practices and minimum home price restrictions on services provided; signs of potential discrimination; and steps that should be taken in instances of suspected discrimination.
City of Detroit's Housing and Revitalization Department and Detroit Disability Power's Accessible Housing Learning Series	6/21/24	45 minutes	Virtual Event/Zoom	Approx. 75	Overview of Fair Housing Laws; Distinguishing FHA vs. ADA Coverages and Construction Requirements; Reasonable Accommodations and Reasonable Modifications; Common Violations; and Affirmative Marketing.
Total	47				