

**HUD FORM 903 COMPLAINT**

**1. Complainant(s):**

National Community Reinvestment Coalition ("NCRC")  
740 15th Street NW, Flr. 4  
Washington, DC 20005

**2. Other Aggrieved Persons:**

NONE

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

*42 U.S.C. 3604, Section 804 (a) and 24 C.F.R. 100.50(b)(1) & 100.60(a)*

To refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin.

*42 U.S.C. 3604 Section 804 (b) and 24 C.F.R. 100.50(b)(2) & 100.65(a)*

To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, familial status, or national origin.

*42 U.S.C. 3604 Section 804 (d) and 24 C.F.R. 100.80(b)(1)*

To represent to any person because of race, color, religion, sex, handicap, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.

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

National Origin

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

216 S. Ann Arbor St., Saline, MI 48176 and  
4136 Montith Dr., Ypsilanti, MI 48197

**6. Respondent(s):**

Keller Williams The Knick Team, Real Estate Company  
Carmen Knick, Real Estate Agent/Owner  
2144 South State Street  
Ann Arbor, MI 48104

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

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The NCRC's fair housing testing program evaluates fair housing practices throughout the United States to combat discriminatory housing practices.

As part of the testing program, NCRC's compliance manager researched racially identifiable names and developed email addresses for White tester profiles and Asian American tester profiles. The NCRC created email address ScottMcAvoy3009@gmail.com to be an identifiably White profile belonging to "Scott McAvoy" and email address BingwenCheung@protonmail.com to be an identifiably Asian American profile belonging to "Bingwen Cheung."

On March 31, 2020, the NCRC conducted 2 match paired sales tests via email on Respondent Carmen Knick, the owner of Knick Team, based on the protected class of National Origin. During the initial test, Respondent received emails about a home for sale located at 216 S. Ann Arbor St., Saline, MI 48176 from the tester profiles of Scott McAvoy (White) and Bingwen Cheung (Asian American). Respondent responded to the email from Scott later that day, but declined to provide a response to Bingwen. Respondents' failure to provide a response indicates a difference in treatment that would hinder an Asian American's access to housing.

The NCRC conducted a follow-up test in March 2021 to confirm the findings were not a single isolated incident but rather a reflection of Respondent's discriminatory behavior. In the second test, Respondent received emails about a different home for sale located at 4136 Montith Rd., Ypsilanti, MI 48197 from two new testing profiles: "Garrett Hartman" and "Hao Nguyen". The email from Garrett.C.Hartman7@gmail.com was sent on March 30, 2021, and the email from HaoNguyen3949@gmail.com was sent on March 31, 2021. Respondent repeated the discriminatory behavior demonstrating a difference in treatment by responding to the email received from Garrett later that day, while ignoring the email received from Hao.

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

March 31, 2021

**9. Types of federal funds identified:**

NONE

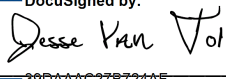
**10. The acts alleged in this complaint, if proven, may constitute a violation of the following:**

The Fair Housing Act, 42 U.S.C. §§ 3604(a) – 3604(b) (2021).; 24 C.F.R. 100.50(b)(1) & 100.60(a); 24 C.F.R. 100.50(b)(2) & 100.65(a)

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The Fair Housing Act, 42 U.S.C. § 3604(c) (2021).; 24 C.F.R. 100.80(b)(1)

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

DocuSigned by:  
  
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7/27/2021

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**Jesse Van Tol, CEO**  
**National Community Reinvestment Coalition**

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**Date**