

HUD FORM 903 COMPLAINT

1. Complainant(s):

National Community Reinvestment Coalition ("NCRC")
740 15th Street NW, Ste. 400
Washington, DC 20005

Stephanie Laferriere-Greer
1112 N. Calhoun St.
Baltimore, MD 21217

2. Other Aggrieved Persons:

NONE

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

42 U.S.C. 3605, Section 805 (a) and 24 C.F.R. 100.50(b)(3)
To discriminate against any person in making available a residential real estate-related transaction, or in the terms or conditions of such a transaction, because of race, color, religion, sex, handicap, familial status or national origin.

4. The alleged violation occurred because of:

Race

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

1112 N. Calhoun St., Baltimore, MD 21217 and
829 Brooks Lane, Baltimore, MD 21217

6. Respondent(s):

RMC Appraisal Services
Robert Cushner, Owner
2203 Arden Rd.
Baltimore, MD 21209

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

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 conducted matched-pair testing of real estate appraisers. One of the appraisers who was tested was the Respondent. An NCRC employee called the Respondent and arranged for an appraisal on behalf of Stephanie

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Laferriere-Greer, a Black tester who owns a home at 1112 North Calhoun Street in Baltimore. Respondent accepted the assignment and inspected Ms. Laferriere-Greer's home on April 14, 2022. Respondent met the tester face-to-face during the home inspection.

Ms. Laferriere-Greer checked her email repeatedly after the inspection of the home occurred. She wondered why the appraisal report was taking so long. On April 25 and May 4, Ms. Laferriere-Greer reported to NCRC that she had not received the report yet.

On April 26, 2022, the NCRC employee who had arranged the appraisal on behalf of Ms. Laferriere-Greer called Respondent to inquire about the status of the appraisal report. Respondent did not answer, so the NCRC employee left a message, asking when the appraisal report would be ready. Respondent declined to return the call.

Respondent did not provide Ms. Laferriere-Greer with an appraisal report until June 28, 2022 – 75 days later. Ms. Laferriere-Greer waited almost 11 weeks for it. The only recognition of the lateness of the report was a comment in the email that said, "Many thanks for your patience with me completing and sending this report."

Because of this poor treatment of Ms. Laferriere-Greer, NCRC tested the Respondent a second time. In the second test, a different NCRC employee arranged an appraisal on behalf of a White tester who owns a home at 829 Brooks Lane in Baltimore. Respondent accepted the assignment and inspected the tester's home on June 14, 2022. Respondent met the tester face-to-face during the home inspection.

On June 23, 2022, just nine days later, Respondent sent the homeowner an email, informing the homeowner that the appraisal report should be ready "by the beginning of next week." Respondent never reached out to Ms. Laferriere-Greer to let her know when her appraisal report would be ready.

Respondent provided an appraisal report for this White tester on July 1, 2022. The White Tester had to wait only 17 days for the report. Ms. Laferriere-Greer was upset and frustrated to learn that a White tester received much prompter and better service from the same appraiser.

There is a significant disparity between how long the Black tester (Ms. Laferriere-Greer) had to wait for an appraisal report and how long the White tester had to wait for an appraisal report. There is also a significant difference in the manner in which the appraiser handled customer relations between Ms. Laferriere-Greer and the White tester. These disparities constitute a significant difference in treatment based on race.

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

July 1, 2022


9. Types of federal funds identified:

NONE

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

42 U.S.C. 3605, Section 805 (a) and 24 C.F.R. 100.50(b)(3)

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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11/4/2022

Jesse Van Tol, CEO
National Community Reinvestment Coalition

Date