

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:21-cv-00395-M

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MILLS CONSTRUCTION COMPANY, INC.,)
MILBURNIE APARTMENTS LIMITED)
PARTNERSHIP, PINE KNOLL LIMITED)
PARTNERSHIP, ROLLINWOOD MANOR, LLC,)
KITTRELL PLACE, LLC, HODGES CREEK)
APARTMENTS, LLC, and ENFIELD POINTE,)
LLC,)
)
Defendants.)
_____)

INDEX OF CONSENT ORDER EXHIBITS

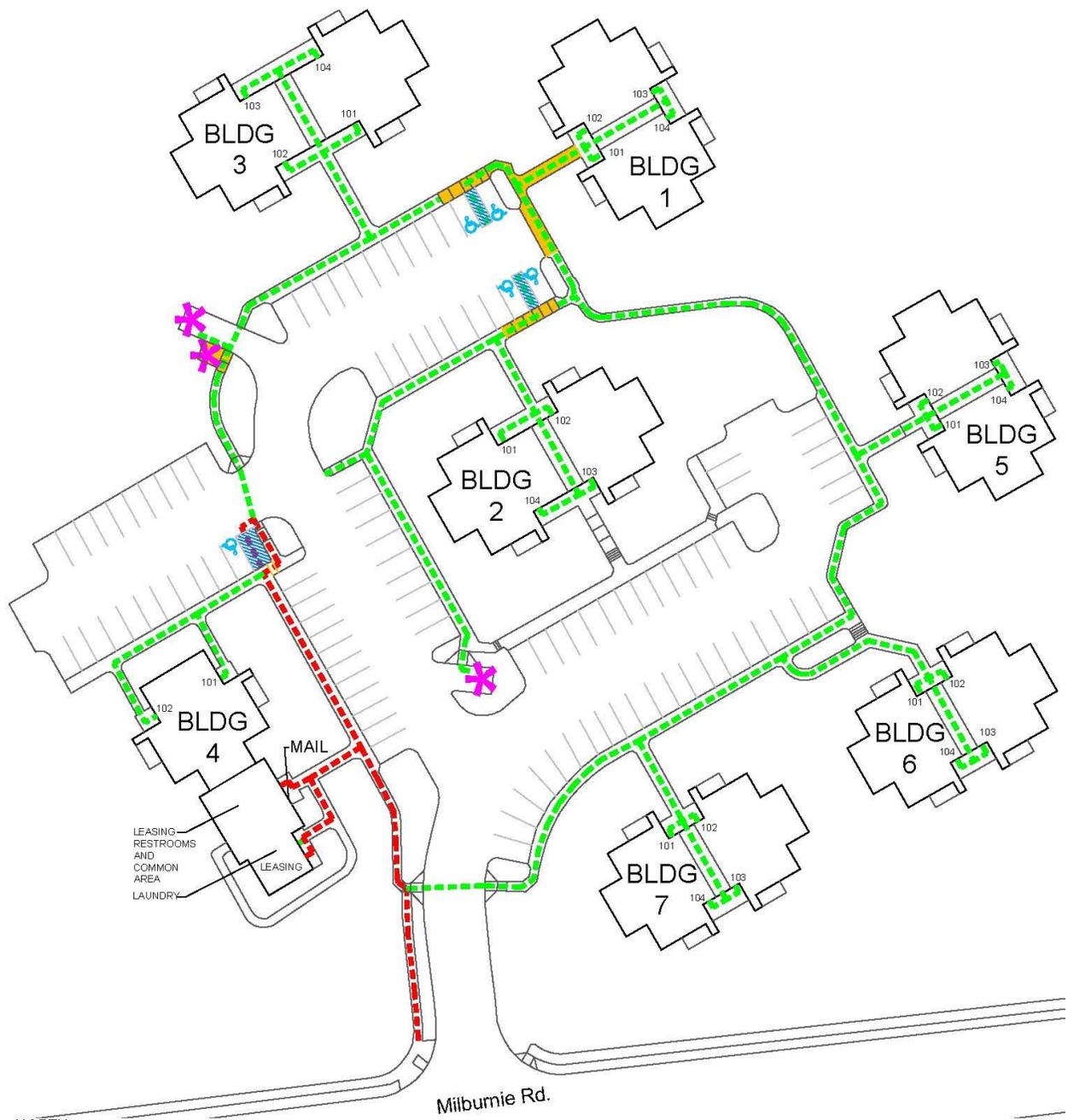
- EXHIBIT 1.1 Milburnie Road Accessible Route
- EXHIBIT 1.2 Milburnie Road Matrix of Required Retrofits to Public and Common Use Areas
- EXHIBIT 1.3 Milburnie Road Matrix of Required Retrofits to Covered Unit Interiors
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- EXHIBIT 2.3 Marsh Creek Matrix of Required Retrofits to Covered Unit Interiors
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- EXHIBIT 3.2 Hodges Creek Matrix of Required Retrofits to Public and Common Use Areas

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- EXHIBIT 13 Release of All Claims
- EXHIBIT 14 Acknowledgment of Receipt of Consent Order
- EXHIBIT 15 Certification of Fair Housing Training

EXHIBIT 1.1

Milburnie Road Accessible Route



NORTH



LEGEND

- COMMON ROUTES
- PUBLIC ROUTES
- AISLE @ PARKING
- DESIGNATED PARKING SPACE
- COMMON AREA AMENITY
- TRASH / RECYCLING
- NEW CONSTRUCTION

Exhibit 1.2

Milburnie Road Matrix of Required Retrofits to Public and Common Use Areas.

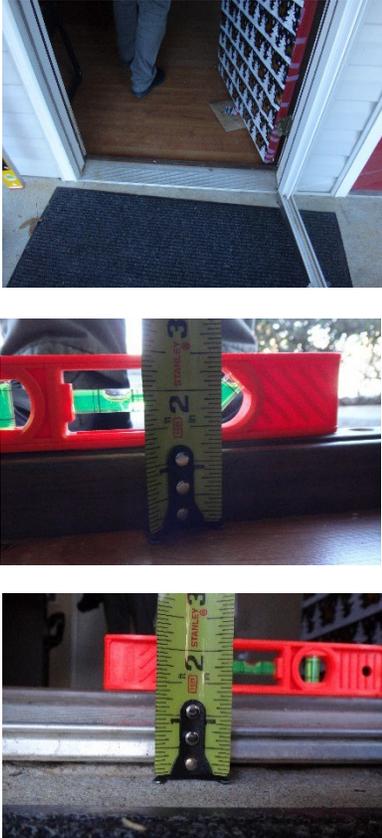
MILBURNIE ROAD APARTMENTS: PUBLIC AND COMMON USE AREAS

A. Inaccessible Features at Public and Common Areas:

Numbers	Photos	Deficiency	Required Retrofit
	Inaccessible Slopes at Routes		
2	 <p><i>Measuring cross slope at turn to mail area.</i></p>	<p>Cross slopes of the routes/sidewalks are more than 2% (maximum 2% allowed).</p> <p>Location</p> <p>Southeast of Building 4 7.2% (at curb ramp at Gibney Dr.)</p> <p>East of Building 4 4.0% (at intersection of Gibney & Sawpit)</p> <p>East of Building 4 3.9% (route to leasing office)</p> <p>East of Building 4 4.5% (route to leasing office)</p>	<p>Modify 3.9%, 4.0%, 4.5%, and 7.2% cross slopes to comply with ANSI 4.3.7.</p>

Numbers	Photos	Deficiency	Required Retrofit
3	<p data-bbox="302 217 758 329"><i>Curb ramp northeast of Building 4 - Picture 1. Running slope -- Picture 2.</i></p> 	<p data-bbox="770 217 1377 329">The running slope of the curb ramp northeast of Building 4 (leading to the leasing office) is 9.4% (maximum 8.3% allowed).</p>	<p data-bbox="1390 217 1717 329">Modify 9.4% running slope of curb ramp to comply with ANSI 4.7.2 and 4.8.2.</p>

Numbers	Photos	Deficiency	Required Retrofit
4	 <p><i>Curb ramp cross slope location.</i></p>  <p><i>Cross slope.</i></p>	The cross slope of the curb ramp northeast of Building 4 is 5.9% (maximum 2.0% allowed).	Modify 5.9% cross slope of curb ramp to comply with ANSI 4.7.2 and 4.8.2.
	Inaccessible Threshold		

Numbers	Photos	Deficiency	Required Retrofit
6	<p data-bbox="302 217 709 370"><i>Leasing office door threshold -- Picture 1. Interior threshold -- Picture 2. Exterior threshold -- Picture 3.</i></p> 	<p data-bbox="770 217 1377 394">The leasing/management office door threshold is 1-1/4 inches high inside and 1- 3/8 inches high at the exterior (maximum 1/2-inch height allowed; maximum 1/4-inch change in level without a bevel allowed.)</p>	<p data-bbox="1390 217 1713 321">Replace threshold to comply with ANSI 4.13.8 and 4.5.2.</p>
	<p data-bbox="302 1305 569 1341">Protruding Objects</p>		

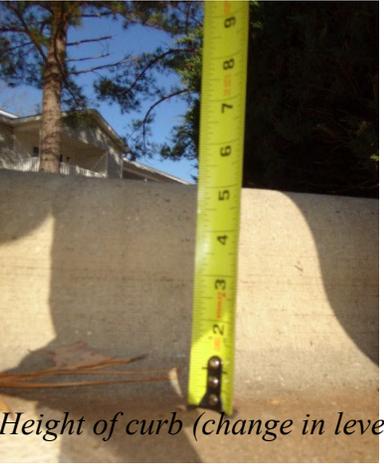
Numbers	Photos	Deficiency	Required Retrofit
7	 <p data-bbox="296 553 575 592"><i>Light fixture by door.</i></p>	The light fixture at the doors to the Leasing Office and to the Laundry Room project approximately 7-1/4 inches into the circulation path (maximum 4 inches allowed). The same light fixture is found at the dwelling unit entries and exterior routes.	Modify light fixture to comply with ANSI 4.4.1.

Routes from Site Arrival Points to Common Areas and Covered Dwelling Units

Inaccessible Features – Milburnie Road Apts.

B. Inaccessible Features at Common Area Routes

	Inaccessible Features at Routes	

Numbers	Photos	Deficiency	Required Retrofit								
8	 <p><i>Curb at trash area.</i></p>  <p><i>Height of curb (change in level).</i></p>	<p>The route has changes in level greater than 1/2 inch (maximum 1/2 inch with bevel allowed).</p> <table border="0"> <thead> <tr> <th data-bbox="770 365 877 391">Location</th> <th data-bbox="1142 329 1241 391">Height (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="770 440 1058 508">North of Building 2 (sidewalk to Building 2)</td> <td data-bbox="1142 440 1178 466">5/8</td> </tr> <tr> <td data-bbox="770 553 1220 621">South of Building 3 (curb at trash area west of Building 3)</td> <td data-bbox="1142 553 1157 579">5</td> </tr> <tr> <td data-bbox="770 662 1058 730">South of Building 3 (sidewalk to Building 3)</td> <td data-bbox="1142 662 1178 688">7/8</td> </tr> </tbody> </table>	Location	Height (inches)	North of Building 2 (sidewalk to Building 2)	5/8	South of Building 3 (curb at trash area west of Building 3)	5	South of Building 3 (sidewalk to Building 3)	7/8	<p>Modify 5/8", 5", and 7/8" to comply with ANSI 4.5.2. Install striping at three crosswalk locations. Note that the accessible route plan requires an accessible route to the dumpster on the SW side of Building 3, so the existing curb ramp must be fixed.</p>
Location	Height (inches)										
North of Building 2 (sidewalk to Building 2)	5/8										
South of Building 3 (curb at trash area west of Building 3)	5										
South of Building 3 (sidewalk to Building 3)	7/8										

Numbers	Photos	Deficiency	Required Retrofit								
9	 <p><i>Location west of Building 5.</i></p>  <p><i>Gap width.</i></p>	<p>Gaps in the pavement are wider than 1/2 inch (maximum 1/2 inch allowed).</p> <table border="1" data-bbox="764 326 1383 618"> <thead> <tr> <th data-bbox="764 367 877 391">Location</th> <th data-bbox="1142 326 1241 391">Width (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="764 399 1115 472">West of Building 5 (cracked concrete sidewalk)</td> <td data-bbox="1163 399 1209 423">3/4</td> </tr> <tr> <td data-bbox="764 480 1115 553">West of Building 7 (cracked concrete sidewalk)</td> <td data-bbox="1163 480 1209 505">7/8</td> </tr> <tr> <td data-bbox="764 561 1115 618">North of Building 7 (cracked concrete sidewalk)</td> <td data-bbox="1163 561 1220 586">>1/2</td> </tr> </tbody> </table>	Location	Width (inches)	West of Building 5 (cracked concrete sidewalk)	3/4	West of Building 7 (cracked concrete sidewalk)	7/8	North of Building 7 (cracked concrete sidewalk)	>1/2	<p>Modify all gaps to comply with ANSI 4.5.4.</p>
Location	Width (inches)										
West of Building 5 (cracked concrete sidewalk)	3/4										
West of Building 7 (cracked concrete sidewalk)	7/8										
North of Building 7 (cracked concrete sidewalk)	>1/2										

Numbers	Photos	Deficiency	Required Retrofit																																														
10	 <p data-bbox="302 581 716 651"><i>Route southwest of Building 1 to Building 5.</i></p>  <p data-bbox="302 943 457 976"><i>Cross slope.</i></p>	<p data-bbox="772 220 1276 285">Cross slopes of the route are more than 2% (maximum 2% allowed).</p> <table data-bbox="772 331 1220 1170"> <thead> <tr> <th data-bbox="772 331 1129 358">Location</th> <th data-bbox="1146 331 1220 358">Slope</th> </tr> </thead> <tbody> <tr> <td data-bbox="772 367 1052 394">Southwest of Building 1</td> <td data-bbox="1146 367 1220 394">3.8%</td> </tr> <tr> <td data-bbox="772 402 1052 430">Northeast of Building 2</td> <td data-bbox="1146 402 1220 430">3.6%</td> </tr> <tr> <td data-bbox="772 438 1003 466">North of Building 2</td> <td data-bbox="1146 438 1220 466">4.2%</td> </tr> <tr> <td data-bbox="772 474 1003 501">North of Building 2</td> <td data-bbox="1146 474 1220 501">4.0%</td> </tr> <tr> <td data-bbox="772 509 1003 537">South of Building 3</td> <td data-bbox="1146 509 1220 537">3.7%</td> </tr> <tr> <td data-bbox="772 545 1115 573">(west of walk to Building 3)</td> <td></td> </tr> <tr> <td data-bbox="772 581 1003 609">South of Building 3</td> <td data-bbox="1146 581 1220 609">3.5%</td> </tr> <tr> <td data-bbox="772 617 1052 644">(at walk to Building 3)</td> <td></td> </tr> <tr> <td data-bbox="772 652 1003 680">South of Building 3</td> <td data-bbox="1146 652 1220 680">3.5%</td> </tr> <tr> <td data-bbox="772 688 1178 716">(south end of walk to Building 3)</td> <td></td> </tr> <tr> <td data-bbox="772 724 1052 751">Southwest of Building 5</td> <td data-bbox="1146 724 1220 751">4.0%</td> </tr> <tr> <td data-bbox="772 760 1052 787">Southwest of Building 5</td> <td data-bbox="1146 760 1220 787">3.9%</td> </tr> <tr> <td data-bbox="772 795 1003 823">West of Building 5</td> <td data-bbox="1146 795 1220 823">4.2%</td> </tr> <tr> <td data-bbox="772 831 1003 859">West of Building 5</td> <td data-bbox="1146 831 1220 859">4.1%</td> </tr> <tr> <td data-bbox="772 867 1052 894">(at walk to Building 5)</td> <td></td> </tr> <tr> <td data-bbox="772 902 1052 930">Northwest of Building 6</td> <td data-bbox="1146 902 1220 930">5.9%</td> </tr> <tr> <td data-bbox="772 938 1052 966">Northwest of Building 6</td> <td data-bbox="1146 938 1220 966">3.7%</td> </tr> <tr> <td data-bbox="772 974 1003 1002">North of Building 6</td> <td data-bbox="1146 974 1220 1002">4.6%</td> </tr> <tr> <td data-bbox="772 1010 1052 1037">Northwest of Building 7</td> <td data-bbox="1146 1010 1220 1037">4.3%</td> </tr> <tr> <td data-bbox="772 1045 1052 1073">Northwest of Building 7</td> <td data-bbox="1146 1045 1220 1073">4.4%</td> </tr> <tr> <td data-bbox="772 1081 1052 1109">Northwest of Building 7</td> <td data-bbox="1146 1081 1220 1109">3.9%</td> </tr> <tr> <td data-bbox="772 1117 1052 1144">Northeast of Building 7</td> <td data-bbox="1146 1117 1220 1144">3.6%</td> </tr> </tbody> </table>	Location	Slope	Southwest of Building 1	3.8%	Northeast of Building 2	3.6%	North of Building 2	4.2%	North of Building 2	4.0%	South of Building 3	3.7%	(west of walk to Building 3)		South of Building 3	3.5%	(at walk to Building 3)		South of Building 3	3.5%	(south end of walk to Building 3)		Southwest of Building 5	4.0%	Southwest of Building 5	3.9%	West of Building 5	4.2%	West of Building 5	4.1%	(at walk to Building 5)		Northwest of Building 6	5.9%	Northwest of Building 6	3.7%	North of Building 6	4.6%	Northwest of Building 7	4.3%	Northwest of Building 7	4.4%	Northwest of Building 7	3.9%	Northeast of Building 7	3.6%	<p data-bbox="1392 220 1711 391">Modify cross slopes ranging from 3.5% to 5.9% to comply with ANSI 4.3.7. Install striping at three crosswalk locations.</p>
Location	Slope																																																
Southwest of Building 1	3.8%																																																
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Northeast of Building 7	3.6%																																																

Numbers	Photos	Deficiency	Required Retrofit										
11	 <p><i>Curb ramp SE of Bldg. 4</i></p>  <p><i>Running slope.</i></p>	<p>Curb ramp running slopes are more than 8.3% (maximum 8.3% allowed).</p> <table border="0"> <thead> <tr> <th data-bbox="764 367 1129 396">Location</th> <th data-bbox="1129 367 1383 396">Slope</th> </tr> </thead> <tbody> <tr> <td data-bbox="764 402 1129 472">Southeast of Building 4 (middle of curb ramp)</td> <td data-bbox="1129 402 1383 431">16.8%</td> </tr> <tr> <td data-bbox="764 479 1129 548">Southeast of Building 4 (bottom of curb ramp)</td> <td data-bbox="1129 479 1383 508">15.4%</td> </tr> <tr> <td data-bbox="764 555 1129 584">Northeast of Building 4</td> <td data-bbox="1129 555 1383 584">10.2%</td> </tr> <tr> <td data-bbox="764 591 1129 620">West of Building 7</td> <td data-bbox="1129 591 1383 620">9.3%</td> </tr> </tbody> </table>	Location	Slope	Southeast of Building 4 (middle of curb ramp)	16.8%	Southeast of Building 4 (bottom of curb ramp)	15.4%	Northeast of Building 4	10.2%	West of Building 7	9.3%	<p>Modify 16.8%, 15.4%, 10.2%, and 9.3% running slopes of curb ramp to comply with ANSI 4.7.2.</p>
Location	Slope												
Southeast of Building 4 (middle of curb ramp)	16.8%												
Southeast of Building 4 (bottom of curb ramp)	15.4%												
Northeast of Building 4	10.2%												
West of Building 7	9.3%												

Numbers	Photos	Deficiency	Required Retrofit				
12	<p data-bbox="302 217 758 293"><i>Curb ramp SE of Bldg. 4 -- Picture 1. Cross slope -- Picture 2.</i></p>  	<p data-bbox="770 217 1289 289">Curb ramp cross slopes are more than 2.0% (maximum 2.0% allowed).</p> <table data-bbox="770 329 1230 435"> <tr> <td data-bbox="770 329 1129 362">Location</td> <td data-bbox="1142 329 1230 362">Slope</td> </tr> <tr> <td data-bbox="770 367 1129 435">Southeast of Building 4 (middle of curb ramp)</td> <td data-bbox="1142 367 1230 399">3.4%</td> </tr> </table>	Location	Slope	Southeast of Building 4 (middle of curb ramp)	3.4%	<p data-bbox="1390 217 1711 321">Modify 3.4% cross slope of curb ramp to comply with ANSI 4.7.6.</p>
Location	Slope						
Southeast of Building 4 (middle of curb ramp)	3.4%						
	<p data-bbox="302 867 674 943">Inaccessible Slopes at Door Maneuvering Spaces</p>						

Numbers	Photos	Deficiency	Required Retrofit										
13	<p><i>Door at Laundry room -- Picture 1.</i> <i>Slope at door approach -- Picture 2.</i></p>  	<p>Common area door maneuvering clear spaces are sloped greater than 2.0% (maximum 2% allowed).</p> <table border="0"> <tr> <td>Location</td> <td>Slope</td> </tr> <tr> <td>Laundry Room</td> <td>3.9%</td> </tr> <tr> <td>Meeting Room</td> <td>5.1%</td> </tr> <tr> <td>(side approach at latch)</td> <td></td> </tr> <tr> <td>Unit 102, Building 1</td> <td>3.4%</td> </tr> </table>	Location	Slope	Laundry Room	3.9%	Meeting Room	5.1%	(side approach at latch)		Unit 102, Building 1	3.4%	<p>Modify 3.9%, 5.1%, and 3.4% slopes of maneuvering spaces to comply with ANSI 4.13.6.</p>
Location	Slope												
Laundry Room	3.9%												
Meeting Room	5.1%												
(side approach at latch)													
Unit 102, Building 1	3.4%												
	<p>Inaccessible Thresholds</p>												

Numbers	Photos	Deficiency	Required Retrofit																
14	<p data-bbox="296 764 695 841"><i>Unit 103, Building 5, entrance door.</i></p>	<p data-bbox="764 212 1383 326">Entrance door thresholds are more than 1/4 inch high and not beveled (maximum 1/4- inch height allowed without bevel).</p> <table data-bbox="764 326 1383 659"> <thead> <tr> <th data-bbox="764 367 1094 399">Location</th> <th data-bbox="1094 326 1383 399">Height (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="764 399 1094 431">Unit 101, Building 2</td> <td data-bbox="1094 399 1383 431">3/4 no bevel</td> </tr> <tr> <td data-bbox="764 431 1094 464">Unit 104, Building 3</td> <td data-bbox="1094 431 1383 464">3/4 no bevel</td> </tr> <tr> <td data-bbox="764 464 1094 496">Unit 101, Building 4</td> <td data-bbox="1094 464 1383 496">5/8 no bevel</td> </tr> <tr> <td data-bbox="764 496 1094 529">Unit 101, Building 5</td> <td data-bbox="1094 496 1383 529">5/8 no bevel</td> </tr> <tr> <td data-bbox="764 529 1094 561">Unit 103, Building 5</td> <td data-bbox="1094 529 1383 561">5/8 no bevel</td> </tr> <tr> <td data-bbox="764 561 1094 594">Unit 103, Building 6</td> <td data-bbox="1094 561 1383 594">5/8 no bevel</td> </tr> <tr> <td data-bbox="764 594 1094 626">Kitchen</td> <td data-bbox="1094 594 1383 626">5/8 no bevel</td> </tr> </tbody> </table>	Location	Height (inches)	Unit 101, Building 2	3/4 no bevel	Unit 104, Building 3	3/4 no bevel	Unit 101, Building 4	5/8 no bevel	Unit 101, Building 5	5/8 no bevel	Unit 103, Building 5	5/8 no bevel	Unit 103, Building 6	5/8 no bevel	Kitchen	5/8 no bevel	<p data-bbox="1383 212 1724 358">Modify thresholds that are more than 3/8 inches high to comply with Requirement 4(4).</p>
Location	Height (inches)																		
Unit 101, Building 2	3/4 no bevel																		
Unit 104, Building 3	3/4 no bevel																		
Unit 101, Building 4	5/8 no bevel																		
Unit 101, Building 5	5/8 no bevel																		
Unit 103, Building 5	5/8 no bevel																		
Unit 103, Building 6	5/8 no bevel																		
Kitchen	5/8 no bevel																		
	<p data-bbox="296 841 569 881">Protruding Objects</p>																		

Numbers	Photos	Deficiency	Required Retrofit
15	 <p><i>Light fixture at entrance to meeting room.</i></p>  <p><i>Light fixture projection.</i></p>	<p>Lights and fire extinguishers project more than 4 inches into the circulation paths (maximum 4 inches allowed).</p> <p>Light Fixtures (inches) Distance Location</p> <p>Meeting room entry:</p> <p> Depth of protrusion 7-1/4</p> <p> Height of leading edge 67-1/2</p> <p>Unit 101, Building 1 7 +/-</p> <p>Unit 102, Building 1:</p> <p> Depth of protrusion 6-3/4</p> <p> Height of leading edge 69-1/2</p> <p>Unit 103, Building 1 7 +/-</p> <p>Unit 104, Building 1 7 +/-</p> <p>Unit 101, Building 2 7 +/-</p> <p>Unit 102, Building 2 7 +/-</p> <p>Unit 103, Building 2 7 +/-</p> <p>Unit 104, Building 2 7 +/-</p> <p>Building 2 Breezeway at 101 7 +/-</p> <p>Building 2 Breezeway at 104 7 +/-</p> <p>Unit 101, Building 3:</p> <p> Depth of protrusion 7-1/2</p> <p> Height of leading edge 69-1/4</p> <p>Unit 102, Building 3 7 +/-</p> <p>Unit 103, Building 3 7 +/-</p> <p>Unit 104, Building 3 7 +/-</p> <p>Building 3 Breezeway at 101 7 +/-</p> <p>Building 3 Breezeway at 102 7 +/-</p> <p>Building 3 behind stairs:</p> <p> Depth of protrusion 71</p> <p> Height of leading edge 71</p>	<p>Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>

Numbers	Photos	Deficiency	Required Retrofit
	 <p data-bbox="296 618 556 654"><i>Light fixture height.</i></p>  <p data-bbox="296 1060 661 1133"><i>Fire extinguisher cabinet at Building 6.</i></p>	<p data-bbox="764 217 1113 250">Building 3 Breezeway at 103</p> <p data-bbox="764 253 1018 285">Unit 101, Building 4</p> <p data-bbox="764 289 1018 321">Unit 102, Building 4</p> <p data-bbox="764 324 1018 357">Unit 101, Building 5</p> <p data-bbox="764 360 1018 393">Unit 102, Building 5:</p> <p data-bbox="800 396 1039 428"> Depth of protrusion</p> <p data-bbox="800 431 1075 464"> Height of leading edge</p> <p data-bbox="764 467 1018 500">Unit 103, Building 5</p> <p data-bbox="764 503 1018 535">Unit 104, Building 5</p> <p data-bbox="764 539 1096 571">Building 5 Breezeway front</p> <p data-bbox="764 574 1018 607">Unit 101, Building 6</p> <p data-bbox="764 610 1018 643">Unit 102, Building 6</p> <p data-bbox="764 646 1018 678">Unit 103, Building 6</p> <p data-bbox="764 682 1018 714">Unit 104, Building 6</p>	

Numbers	Photos	Deficiency	Required Retrofit
	 <p data-bbox="296 540 709 573"><i>Fire extinguisher cabinet depth.</i></p>  <p data-bbox="296 982 751 1052"><i>Fire extinguisher height (to bottom of cabinet).</i></p>	<p data-bbox="770 220 1094 248">Building 6 Breezeway rear:</p> <p data-bbox="806 256 1226 284">Depth of protrusion 5-1/4</p> <p data-bbox="806 292 1241 319">Height of leading edge 69-1/4</p> <p data-bbox="770 328 1226 355">Unit 101, Building 7 7 +/-</p> <p data-bbox="770 363 1226 391">Unit 102, Building 7 7 +/-</p> <p data-bbox="770 399 1226 427">Unit 103, Building 7 7 +/-</p> <p data-bbox="770 435 1226 462">Unit 104, Building 7 7 +/-</p> <p data-bbox="770 470 1226 498">Building 7 Breezeway font 5 +/-</p> <p data-bbox="770 506 1094 534">Building 7 Breezeway rear:</p> <p data-bbox="806 542 1226 570">Depth of protrusion 7-1/4</p> <p data-bbox="806 578 1241 605">Height of leading edge 69-3/4</p> <p data-bbox="770 613 1226 641">Building 7 behind stair 7 +/-</p> <p data-bbox="770 699 1251 727">Fire Extinguishers Distance</p> <p data-bbox="770 735 1241 763">Location (inches)</p> <p data-bbox="770 771 1041 799">Building 1 Breezeway:</p> <p data-bbox="806 807 1226 834">Depth of protrusion 6-3/4</p> <p data-bbox="806 842 1241 870">Height of leading edge 41-1/4</p> <p data-bbox="770 878 1052 906">Building 2 behind stair:</p> <p data-bbox="806 914 1226 941">Depth of protrusion 6-5/8</p> <p data-bbox="806 950 1241 977">Height of leading edge 42-7/8</p> <p data-bbox="770 985 1283 1013">Building 2 Breezeway rear 6-1/4 +/-</p> <p data-bbox="770 1021 1041 1049">Building 3 Breezeway:</p> <p data-bbox="806 1057 1226 1084">Depth of protrusion 6-1/4</p>	

Numbers	Photos	Deficiency	Required Retrofit
		Height of leading edge 40-1/2 Building 5 Breezeway 6-1/4 +/- Building 6 Breezeway: Depth of protrusion 7-3/4 Height of leading edge 41-3/8 Building 7 Breezeway: Depth of protrusion 6-3/4 Height of leading edge 43 Laundry Room Counter: Depth of protrusion 5-3/4 Height of leading edge 35	
C. Common Use Areas			
	Inaccessible Common Area Features		

Numbers	Photos	Deficiency	Required Retrofit						
16	<p data-bbox="302 217 737 293"><i>Slope at recycling center -- Photo 1. Cross slope -- Photo 2.</i></p> 	<p data-bbox="785 217 1362 321">Clear space at the recycling center clear floor space has a cross slope of 3.8% (maximum 2% allowed).</p> <table border="1" data-bbox="785 363 1260 435"> <thead> <tr> <th data-bbox="785 363 1079 396"><u>Location</u></th> <th data-bbox="1079 363 1260 396"><u>Slope</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="785 396 1079 435">Southwest of Building 3</td> <td data-bbox="1079 396 1260 435">3.8%</td> </tr> </tbody> </table>	<u>Location</u>	<u>Slope</u>	Southwest of Building 3	3.8%	<p data-bbox="1390 217 1709 289">Modify 3.8% cross slope to comply with ANSI 4.3.7.</p>		
<u>Location</u>	<u>Slope</u>								
Southwest of Building 3	3.8%								
17	<p data-bbox="302 883 737 1003"><i>Maneuvering clearance at meeting room rear exit (door on the far wall adjacent to the windows).</i></p> 	<p data-bbox="785 883 1362 987">The meeting room door maneuvering clearances are less than 18 inches on the pull side (minimum 18 inches required).</p> <table border="1" data-bbox="785 1029 1260 1175"> <thead> <tr> <th data-bbox="785 1062 1079 1094"><u>Location</u></th> <th data-bbox="1079 1029 1260 1094"><u>Distance (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="785 1094 1079 1127">Meeting Room rear exit</td> <td data-bbox="1079 1094 1260 1127"><18</td> </tr> <tr> <td data-bbox="785 1127 1079 1159">Men's Restroom</td> <td data-bbox="1079 1127 1260 1159">12</td> </tr> </tbody> </table>	<u>Location</u>	<u>Distance (inches)</u>	Meeting Room rear exit	<18	Men's Restroom	12	<p data-bbox="1390 883 1709 1101">At rear exit, modify by mirroring the door hinges to the opposite side to provide 18" on pull side in order to comply with ANSI 4.13.6.</p> <p data-bbox="1390 1143 1709 1214">At men's restroom, relocate fire extinguisher.</p>
<u>Location</u>	<u>Distance (inches)</u>								
Meeting Room rear exit	<18								
Men's Restroom	12								

Numbers	Photos	Deficiency	Required Retrofit
18	<p data-bbox="302 217 751 326"><i>Floor transition at meeting room -- Photo 1. Change in level -- Photo 2.</i></p> 	<p data-bbox="770 217 1346 391">The meeting room has a 3/4 inch high change in level at the flooring transition near the rear exit door that is not beveled (maximum 1/2 inch with bevel allowed; maximum 1/4 allowed without bevel).</p>	<p data-bbox="1390 217 1696 282">Modify change in level to comply with ANSI 4.5.2.</p>
19	 <p data-bbox="302 1289 569 1321"><i>Work surface height.</i></p>	<p data-bbox="770 953 1339 1094">The top of the community room kitchen work surface and the sink rim/counter are both 36-1/2 inches above the floor (maximum 34 inches allowed at full kitchen with range).</p>	<p data-bbox="1390 953 1696 1018">Modify kitchen counter to comply with ANSI 4.30.4.</p>

Numbers	Photos	Deficiency	Required Retrofit								
20	<p data-bbox="302 217 751 370"><i>Outlet at kitchenette countertop adjacent to refrigerator -- Photo 1.</i> <i>Clear width at countertop -- Photo 2.</i></p>  	<p data-bbox="770 217 1377 472">The countertop outlets do not have the minimum clear floor space required. Refrigerator, range, and countertop block parallel approach. The clear spaces on both sides are less than 48 inches wide (minimum 48 inches required for parallel approach. Note: maximum depth of side reach range is 25-1/2 inches.)</p> <table border="1" data-bbox="770 516 1260 695"> <thead> <tr> <th data-bbox="770 553 877 581">Location</th> <th data-bbox="1146 516 1241 581">Width (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="770 591 995 618">Left of refrigerator</td> <td data-bbox="1173 591 1255 618">30-3/8</td> </tr> <tr> <td data-bbox="770 626 1136 654">Between refrigerator and range</td> <td data-bbox="1173 626 1255 654">29-7/8</td> </tr> <tr> <td data-bbox="770 662 1052 690">Between range and sink</td> <td data-bbox="1173 662 1205 690">11</td> </tr> </tbody> </table>	Location	Width (inches)	Left of refrigerator	30-3/8	Between refrigerator and range	29-7/8	Between range and sink	11	<p data-bbox="1390 217 1675 326">Install waterproof powerstrip within reach range requirements.</p>
Location	Width (inches)										
Left of refrigerator	30-3/8										
Between refrigerator and range	29-7/8										
Between range and sink	11										

Numbers	Photos	Deficiency	Required Retrofit
21	<p data-bbox="302 217 737 253"><i>Exposed pipes under kitchen sink.</i></p> 	<p data-bbox="770 217 1377 285">Kitchen sink pipes are not insulated or otherwise protected (insulation or protection required).</p>	<p data-bbox="1390 217 1713 321">Accept proposed fix. Insulate pipe to comply with ANSI 4.19.4.</p>
<p data-bbox="302 764 737 800">Inaccessible Restroom Features</p>			
22	<p data-bbox="302 867 737 902"><i>Flush control at men's restroom.</i></p> 	<p data-bbox="770 867 1377 971">The men's restroom flush control is located on the side of the toilet opposite the side of approach (not allowed).</p>	<p data-bbox="1390 867 1713 935">Modify flush control to comply with ANSI 4.16.5.</p>

Numbers	Photos	Deficiency	Required Retrofit
23	 <p><i>Rear grab bar at men's restroom.</i></p>  <p><i>Height of rear grab bar.</i></p>	<p>Toilet grab bars are more than 36 inches above the floor (maximum 36 inches allowed by ADA, maximum 36-3/4 allowed by ANSI 1986).</p> <p>Grab bar Men's rear wall</p> <p>Height (inches) 37-7/8</p>	<p>Fix 37 7/8" to comply with ANSI 4.16.4.</p>

Numbers	Photos	Deficiency	Required Retrofit
24	 <p data-bbox="304 500 724 532"><i>Side grab bar in men's restroom.</i></p> <p data-bbox="304 824 655 889"><i>Dimension of side grab bar extension.</i></p>	<p data-bbox="772 219 1375 321">The men's restroom side grab bar at the toilet extends 47 inches from the rear wall (minimum 54 inches required).</p>	<p data-bbox="1392 219 1711 284">Relocate grab bar to comply with ANSI 4.17.6.</p>
25	 <p data-bbox="304 1360 730 1393"><i>Rear grab bar in men's restroom.</i></p>	<p data-bbox="772 1002 1375 1104">The rear wall grab bars in both the men's and women's restrooms are 24 inches long (minimum 36 inches required).</p>	<p data-bbox="1392 1002 1711 1066">Modify flush control to comply with ANSI 4.16.5.</p>

Numbers	Photos	Deficiency	Required Retrofit
26	 <p data-bbox="296 813 716 885"><i>Exposed pipes under lavatory in men's restroom</i></p>	<p data-bbox="770 217 1377 321">Lavatory pipes in both the men's and the women's restrooms are not insulated or otherwise protected (not allowed).</p>	<p data-bbox="1390 217 1717 282">Insulate pipe to comply with ANSI 4.19.4.</p>

Numbers	Photos	Deficiency	Required Retrofit
27	 <p><i>Mirror in men's restroom.</i></p>  <p><i>Height of mirror above floor in men's restroom.</i></p>	<p>The reflective mirror surfaces are more than 40 inches above the floor (maximum 40 inches allowed).</p> <p>Location Women's restroom</p> <p>Height (inches) 41-7/8</p>	<p>Fix 41 7/8" to comply with ANSI 4.19.6.</p>

Numbers	Photos	Deficiency	Required Retrofit						
28	 <p><i>Dispenser in men's restroom.</i></p>  <p><i>Height of paper towel.</i></p>	<p>The paper towel dispensers are more than 48 inches above the floor (maximum 48 inches allowed).</p> <table border="1" data-bbox="770 326 1205 472"> <thead> <tr> <th data-bbox="770 367 877 391">Location</th> <th data-bbox="1100 326 1205 391">Height (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="770 402 957 427">Men's restroom</td> <td data-bbox="1121 402 1163 427">58</td> </tr> <tr> <td data-bbox="770 440 995 464">Women's restroom</td> <td data-bbox="1121 440 1163 464">60</td> </tr> </tbody> </table>	Location	Height (inches)	Men's restroom	58	Women's restroom	60	Relocate paper towel dispenser to comply with ANSI 4.25.3.
Location	Height (inches)								
Men's restroom	58								
Women's restroom	60								
	<p>Additional Information Based on 2010 ADA</p>								

Numbers	Photos	Deficiency	Required Retrofit
	<p data-bbox="302 217 709 289"><i>Men's room stall door standing ajar.</i></p> 	<p data-bbox="770 217 1377 289">Both the men's and women's accessible toilet stall doors do not self-close (self-closing required).</p>	<p data-bbox="1390 217 1629 321">Modify stall door to comply with ADA 604.8.1.2.</p>

Exhibit 1.3

Milburnie Road Matrix of Required Retrofits to Covered Unit Interiors

MILBURNIE ROAD APARTMENTS: COVERED UNIT INTERIORS

D. Covered Dwelling Units

Milburnie Road Unit Chart:

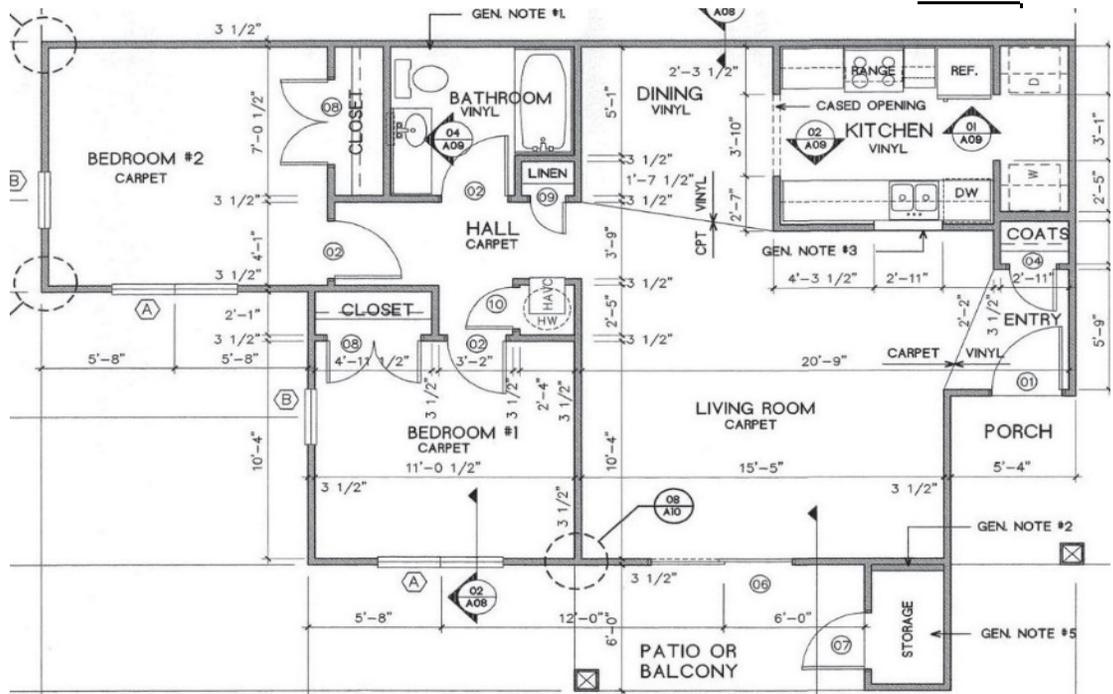
Building	Unit Types						Totals
	1st Floor (Covered Units)				2nd Floor		Covered Units
	2b1b	2b1b A	3b2b	3b2b A	2b1b	3b2b	
1 - 910 Sawpit	2	2	0	0	4	0	4
2 - 900 Sawpit	2	0	0	2	2	2	4
3 - 915 Sawpit	0	0	4	0	0	4	4
4 - 901 Sawpit	0	0	2	0	-	-	2
5 - 830 Gibney	4	0	0	0	4	0	4
6 - 820 Gibney	4	0	0	0	4	0	4
7 - 800 Gibney	4	0	0	0	4	0	4
Total	16	2	6	2	18	6	26

The following units were surveyed: Unit 101, Building 1 – 2 Bedroom / 1 Bath Unit (Accessible); Unit 101, Building 2 – 3 Bedroom / 2 Bath Unit (Accessible); Unit 103, Building 2 – 2 Bedroom / 1 Bath Unit; Unit 101, Building 6 – 2 Bedroom / 1 Bath Unit; Unit 102,

Building 3 – 3 Bedroom / 2 Bath Unit; and Unit 104, Building 3 – 3 Bedroom / 2 Bath Unit

UNIT TYPE: 2 Bedroom, 1 Bathroom – (Standard)

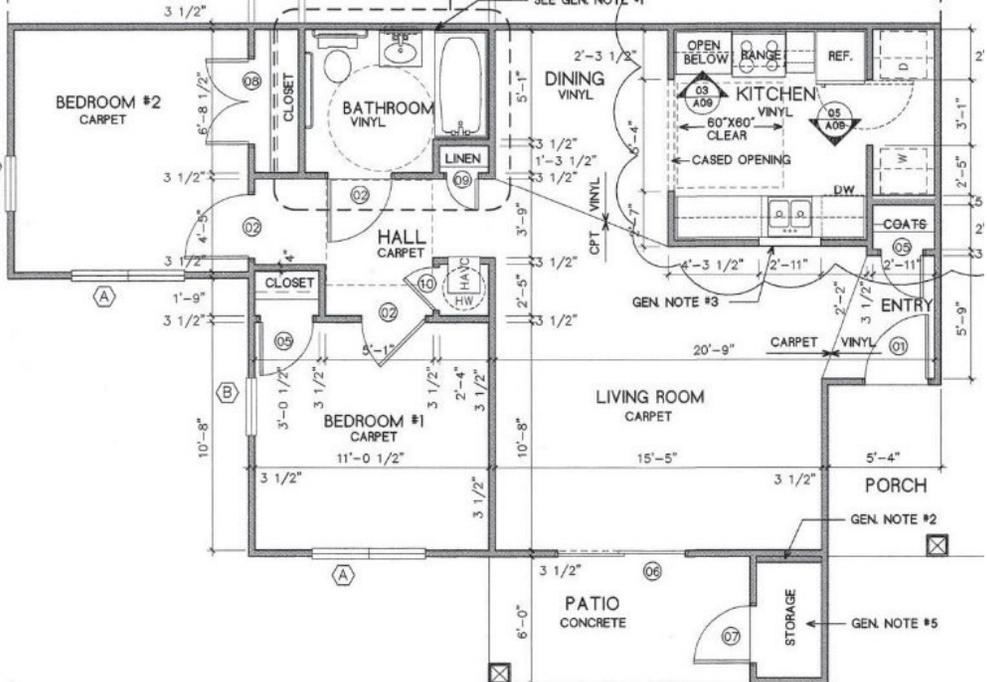
Surveyed Unit 103, Building 2 and Unit 101, Building 6 – Typical for 16 total units



Numbers	Photos	Deficiency	Required Retrofit								
29	 <p data-bbox="317 1372 785 1453"><i>Patio door threshold at Unit 103, Building 2.</i></p>	<p data-bbox="785 911 1407 1024">Door thresholds are more than 3/4 inch high and are not beveled (maximum 3/4 inch with bevel allowed).</p> <table border="1" data-bbox="785 1024 1407 1284"> <thead> <tr> <th data-bbox="785 1024 1134 1057">Height Location</th> <th data-bbox="1134 1024 1407 1057">(inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="785 1057 1134 1097">Unit 103, Building 2 Patio interior side</td> <td data-bbox="1134 1057 1407 1097">1-1/4</td> </tr> <tr> <td data-bbox="785 1097 1134 1203">Unit 101, Building 6 side</td> <td data-bbox="1134 1097 1407 1203">1-3/8 Patio interior side</td> </tr> <tr> <td data-bbox="785 1203 1134 1284">Unit 101, Building 6 exterior side</td> <td data-bbox="1134 1203 1407 1284">1-3/8 Storage</td> </tr> </tbody> </table>	Height Location	(inches)	Unit 103, Building 2 Patio interior side	1-1/4	Unit 101, Building 6 side	1-3/8 Patio interior side	Unit 101, Building 6 exterior side	1-3/8 Storage	<p data-bbox="1407 911 1753 1024">Modify door thresholds to comply with Requirement 4(4).</p>
Height Location	(inches)										
Unit 103, Building 2 Patio interior side	1-1/4										
Unit 101, Building 6 side	1-3/8 Patio interior side										
Unit 101, Building 6 exterior side	1-3/8 Storage										

Numbers	Photos	Deficiency	Required Retrofit										
30	 <p data-bbox="323 581 728 651"><i>Clear opening at storage closet door.</i></p>	<p data-bbox="793 220 1373 326">Doors at patios and storage closets have clear openings less than 31-5/8 inches wide (minimum 31-5/8 inch required).</p> <table border="1" data-bbox="793 367 1310 732"> <thead> <tr> <th data-bbox="793 402 898 431">Location</th> <th data-bbox="1163 367 1310 431">Clear Width (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="793 440 1037 505">Unit 103, Building 2 Patio door</td> <td data-bbox="1184 440 1268 469">30-1/2</td> </tr> <tr> <td data-bbox="793 513 1089 578">Unit 103, Building 2 Storage door (approx.)</td> <td data-bbox="1184 513 1268 542">29-1/2</td> </tr> <tr> <td data-bbox="793 586 1037 651">Unit 101, Building 6 Patio door</td> <td data-bbox="1184 586 1268 615">30-5/8</td> </tr> <tr> <td data-bbox="793 659 1037 724">Unit 101, Building 6 Storage door</td> <td data-bbox="1184 659 1268 688">29-1/2</td> </tr> </tbody> </table>	Location	Clear Width (inches)	Unit 103, Building 2 Patio door	30-1/2	Unit 103, Building 2 Storage door (approx.)	29-1/2	Unit 101, Building 6 Patio door	30-5/8	Unit 101, Building 6 Storage door	29-1/2	<p data-bbox="1415 220 1736 472">For sliding door, trim door stop to provide 31 5/8" to comply with Requirement 3(2). For storage door, modify door on-request to comply with Requirement 3(2).</p>
Location	Clear Width (inches)												
Unit 103, Building 2 Patio door	30-1/2												
Unit 103, Building 2 Storage door (approx.)	29-1/2												
Unit 101, Building 6 Patio door	30-5/8												
Unit 101, Building 6 Storage door	29-1/2												
31	 <p data-bbox="323 1333 684 1403"><i>Height of outlet in Unit 103, Building 2.</i></p>	<p data-bbox="793 773 1373 837">Typical outlets are 13-1/2 inches above the floor (minimum 15-inches required).</p>	<p data-bbox="1415 773 1745 1317">Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation. Or, raise one outlet per wall to comply with Requirement #5.</p>										

Numbers	Photos	Deficiency	Required Retrofit
31a.		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide affidavits to confirm that reinforcement is installed to comply with Requirement 6.
32	 <p data-bbox="321 743 743 857"><i>Clear floor space at counter and outlet obstructed by adjacent refrigerator and range.</i></p>	The outlets above kitchen countertops lack the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).	Install power strip and position to eliminate any reach range issues.
<p>UNIT TYPE: 2 Bedroom, 1 Bathroom – (Accessible) Surveyed Unit 101, Building 1 – Typical for 2 total units</p>			

Numbers	Photos	Deficiency	Required Retrofit				
							
34	 <p data-bbox="317 1328 758 1398"><i>Patio door threshold exterior side at Unit 101, Building 1.</i></p>	<p data-bbox="793 930 1396 1036">Door thresholds are more than 3/4 inches high at the interior face and are not beveled (maximum 3/4 inch with bevel allowed).</p> <table border="1" data-bbox="793 1076 1270 1182"> <thead> <tr> <th data-bbox="793 1117 898 1141">Location</th> <th data-bbox="1171 1076 1270 1141">Height (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="793 1149 1115 1182">Unit 101, Building 1, Patio</td> <td data-bbox="1203 1149 1270 1182">1-1/4</td> </tr> </tbody> </table>	Location	Height (inches)	Unit 101, Building 1, Patio	1-1/4	<p data-bbox="1415 930 1724 1036">Modify threshold to comply with Requirement 4(4).</p>
Location	Height (inches)						
Unit 101, Building 1, Patio	1-1/4						

Numbers	Photos	Deficiency	Required Retrofit
35	 <p data-bbox="323 553 653 581"><i>Clear patio door opening.</i></p>	<p>Patio and storage closet door clear opening widths are less than 31-5/8 inches (minimum 31-5/8 inch required).</p>	<p>For sliding door, trim door stop to provide 31 5/8" to comply with Requirement 3(2). For storage door, modify door on-request to comply with Requirement 3(2).</p>
36	 <p data-bbox="323 1138 684 1208"><i>Height of outlet in Unit 101, Building 1.</i></p>	<p>Typical outlets are 13-3/8 to 13-1/2 inches above the floor (minimum 15-inches required).</p>	<p>Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation. Or, raise one outlet per wall to comply with Requirement 5.</p>

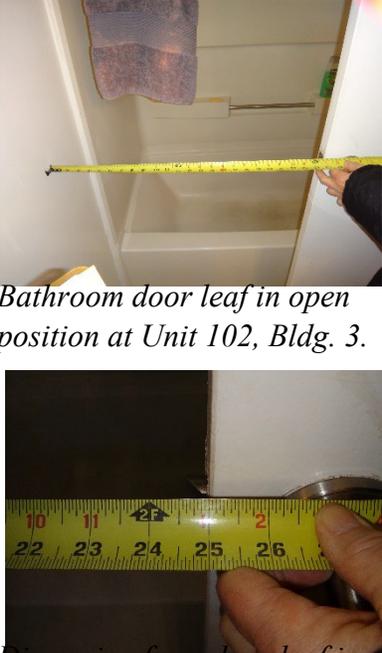
Numbers	Photos	Deficiency	Required Retrofit
37	 <p data-bbox="317 574 737 693"><i>Clear floor space obstructed by adjacent refrigerator and range. Unit 101, Building 1.</i></p>	The outlets above kitchen countertops lack required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).	Install power strip within reach range requirements.

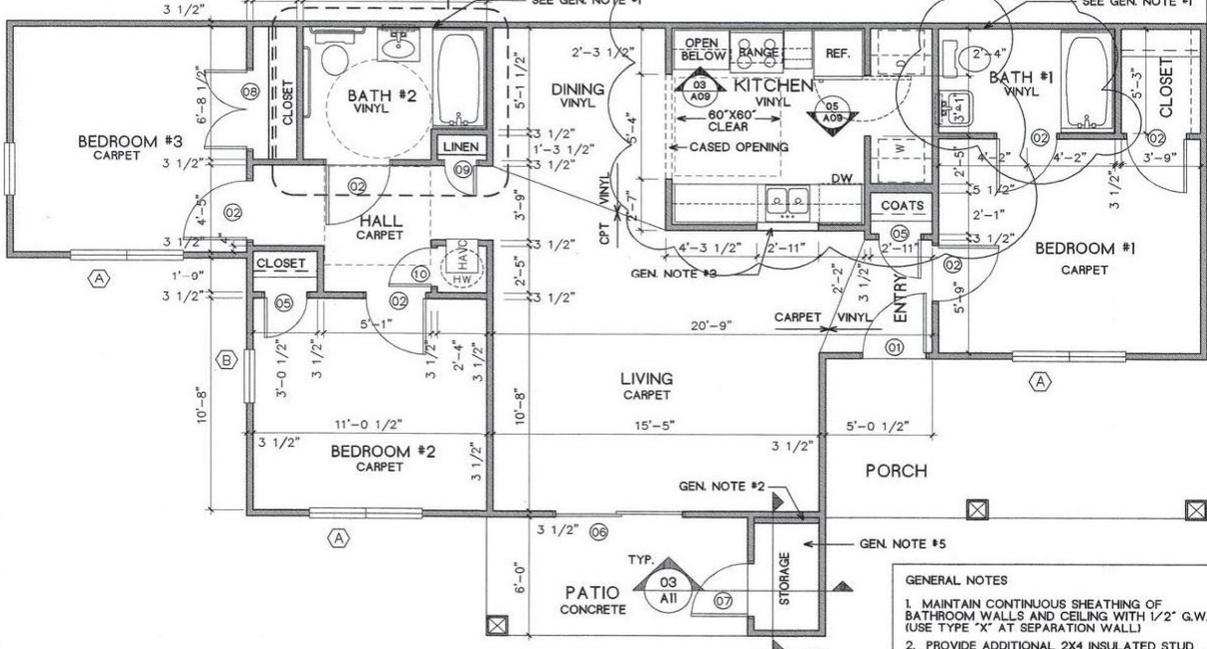
Numbers	Photos	Deficiency	Required Retrofit
UNIT TYPE: 3 Bedroom, 2 Bathroom – (Standard)			
Surveyed Unit 102, Building 3 and Unit 104, Building 3 – Typical for 6 total units			

Numbers	Photos	Deficiency	Required Retrofit								
38	 <p data-bbox="323 610 747 683"><i>Patio door threshold at Unit 103, Building 2.</i></p>	<p data-bbox="793 220 1400 326">Door thresholds are more than 3/4 inches high at the interior face and are not beveled (maximum 3/4 inch with bevel allowed).</p> <table border="1" data-bbox="793 367 1272 659"> <thead> <tr> <th data-bbox="793 402 898 431">Location</th> <th data-bbox="1167 367 1272 431">Height (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="793 440 1037 505">Unit 102, Building 3 Patio interior side</td> <td data-bbox="1167 440 1230 469">1-1/2</td> </tr> <tr> <td data-bbox="793 513 1037 578">Unit 104, Building 3 Entry interior side</td> <td data-bbox="1167 513 1230 542">1-3/8</td> </tr> <tr> <td data-bbox="793 586 1037 651">Unit 104, Building 3 Patio interior side</td> <td data-bbox="1167 586 1230 615">1-1/4</td> </tr> </tbody> </table>	Location	Height (inches)	Unit 102, Building 3 Patio interior side	1-1/2	Unit 104, Building 3 Entry interior side	1-3/8	Unit 104, Building 3 Patio interior side	1-1/4	<p data-bbox="1417 220 1736 318">Install a bevel at 1:2 to comply with Requirement 5.</p>
Location	Height (inches)										
Unit 102, Building 3 Patio interior side	1-1/2										
Unit 104, Building 3 Entry interior side	1-3/8										
Unit 104, Building 3 Patio interior side	1-1/4										
39	 <p data-bbox="323 1211 653 1248"><i>Clear patio door opening.</i></p>	<p data-bbox="793 695 1400 800">Patio and storage closet door clear opening widths are less than 31-5/8 inches (minimum 31-5/8 inch required).</p> <table border="1" data-bbox="793 841 1297 1057"> <thead> <tr> <th data-bbox="793 878 898 907">Location</th> <th data-bbox="1150 841 1297 907">Clear Width (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="793 915 1037 980">Unit 102, Building 3 Patio door</td> <td data-bbox="1167 915 1251 945">30-3/4</td> </tr> <tr> <td data-bbox="793 989 1037 1053">Unit 104, Building 3 Patio door</td> <td data-bbox="1167 989 1251 1018">30-1/2</td> </tr> </tbody> </table>	Location	Clear Width (inches)	Unit 102, Building 3 Patio door	30-3/4	Unit 104, Building 3 Patio door	30-1/2	<p data-bbox="1417 695 1736 946">For sliding door, trim door stop to provide 31 5/8" to comply with Requirement 3(2). For storage door, modify door on-request to comply with Requirement 3(2).</p>		
Location	Clear Width (inches)										
Unit 102, Building 3 Patio door	30-3/4										
Unit 104, Building 3 Patio door	30-1/2										

Numbers	Photos	Deficiency	Required Retrofit
40		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide affidavits to confirm that reinforcement is installed to comply with Requirement 6.
41	 <p data-bbox="321 716 737 824"><i>Clear floor space obstructed by adjacent refrigerator and range. Unit 102, Building 3.</i></p>	The outlets above kitchen countertops lack required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).	Install power strip within reach range requirements.
42	<p data-bbox="321 837 758 906"><i>Vanity base in Unit 104, Building 3.</i></p> 	Lavatory centerlines are 13-1/4 inches to the side wall (minimum 24 inches required for parallel approach) and the cabinets are not removable.	Ensure that one bathroom in each unit is a fully compliant Spec-B layout.

Numbers	Photos	Deficiency	Required Retrofit
43	 <p data-bbox="325 462 667 495"><i>Toilet in Unit 102, Bldg. 3.</i></p> <p data-bbox="325 738 760 812"><i>Dimension from side wall to toilet centerline in Unit 102, Bldg. 3.</i></p>	<p data-bbox="793 219 1400 397">The toilet centerlines are 14-1/4 inches to 16-1/4 inches from the side of the bathtub (minimum 18 inches required on the side opposite the direction of approach). Hall Bathroom -- 14 1/4"; Master Bathroom -- 16 1/4".</p>	<p data-bbox="1417 219 1732 511">Where applicable, in both the Hall Bathroom and the Master Bathroom, install offset toilet flange so centerline of toilet will be 16" minimum from wall to comply with Requirement 7(2)(a)(ii) and Figure 7(a).</p>

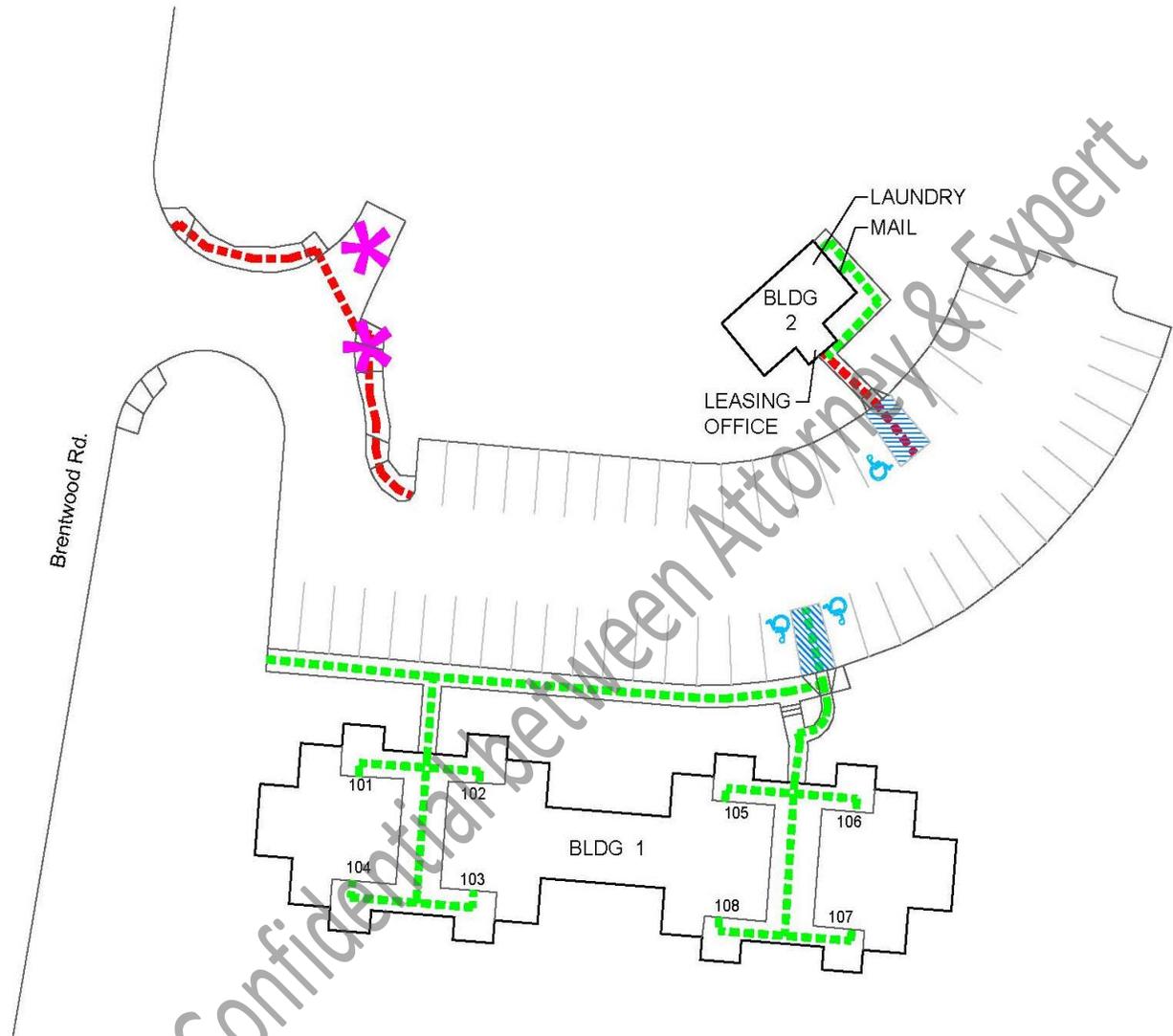
Numbers	Photos	Deficiency	Required Retrofit
44	 <p data-bbox="327 500 695 573"><i>Bathroom door leaf in open position at Unit 102, Bldg. 3.</i></p> <p data-bbox="327 865 758 938"><i>Dimension from door leaf in open position to rear wall.</i></p>	Clear floor space in the master bathroom is less than 24-7/8 inches to 25 inches long (minimum 48 inches clear of the door swing required).	In the Master Bath, reverse the swing of door into bedroom to provide a clear floor space to comply with Requirement 7(2)(b)(i)
<p>UNIT TYPE: 3 Bedroom, 2 Bathroom – (Accessible) Surveyed Unit 101, Building 2 – Typical for 2 total units</p>			

Numbers	Photos	Deficiency	Required Retrofit												
															
45	 <p data-bbox="317 1388 756 1453"><i>Entry door threshold interior side at Unit 101, Building 2.</i></p>	<p data-bbox="787 893 1396 998">Door thresholds are more than 3/4 inches high at the interior face and are not beveled (maximum 3/4 inch with bevel allowed).</p> <p data-bbox="787 1039 903 1063"><u>Location</u></p> <table data-bbox="787 1071 1396 1291"> <tr> <td>Unit 101, Building 2</td> <td>1-1/8</td> </tr> <tr> <td>Entry interior side</td> <td></td> </tr> <tr> <td>Unit 101, Building 2</td> <td>1-1/8</td> </tr> <tr> <td>Patio interior side</td> <td></td> </tr> <tr> <td>Unit 101, Building 2</td> <td>3/4</td> </tr> <tr> <td>Storage exterior side</td> <td></td> </tr> </table>	Unit 101, Building 2	1-1/8	Entry interior side		Unit 101, Building 2	1-1/8	Patio interior side		Unit 101, Building 2	3/4	Storage exterior side		<p data-bbox="1409 893 1732 1071">Install a bevel at 1:2 on the interior side of the sliding door. Accept proposed fix for entry door and on-request for storage door.</p>
Unit 101, Building 2	1-1/8														
Entry interior side															
Unit 101, Building 2	1-1/8														
Patio interior side															
Unit 101, Building 2	3/4														
Storage exterior side															

Numbers	Photos	Deficiency	Required Retrofit
46	 <p data-bbox="321 553 653 586"><i>Clear patio door opening.</i></p>	Clear openings at patio and storage closet doors are less than 31-5/8 inches wide (minimum 31-5/8 inch required).	For sliding door, trim door stop to provide 31 5/8" minimum clear opening to comply with Requirement 3(2). For storage door, modify door on-request to comply with Requirement 3(2).
46a.		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide affidavits to confirm that reinforcement is installed to comply with Requirement 6.
47	 <p data-bbox="321 1008 516 1040"><i>Kitchen layout.</i></p>  <p data-bbox="321 1292 737 1398"><i>Clear floor space obstructed by adjacent refrigerator and range. Unit 101, Building 2.</i></p>	The outlets above kitchen countertops lack the required clear floor space for approach. (At least 1 outlet in each counter area must have clear floor space for approach.)	Install power strip within reach range requirement.

EXHIBIT 2.1

Marsh Creek Accessible Route



NORTH



LEGEND

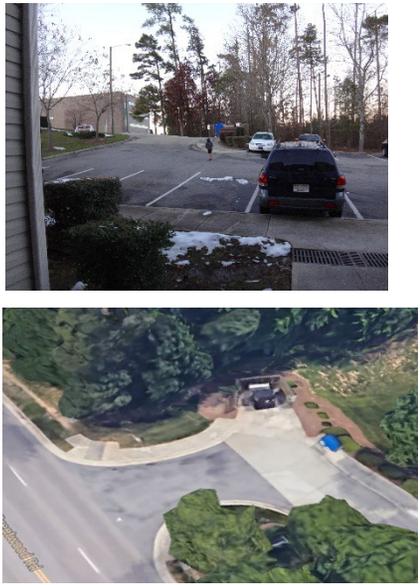
- COMMON ROUTES
- PUBLIC ROUTES
- AISLE @ PARKING
- DESIGNATED PARKING SPACE
- COMMON AREA AMENITY
- * TRASH / RECYCLING

Exhibit 2.2

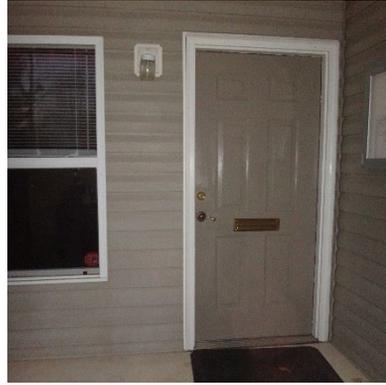
Marsh Creek Matrix of Required Retrofits to Public and Common Use Areas

MARSH CREEK APARTMENTS: PUBLIC AND COMMON USE AREAS

A. Inaccessible Features at Public and Common Areas:

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
1	 <p><i>Route along drive lane.</i></p>	<p>There is no accessible route between pedestrian site arrival points and leasing office.</p>	<p>Install a new accessible parking (drop-off) space adjacent to the dumpster facility for a vehicular route exception. Space to be located on the east (right) side of the pad so that a vehicle stopped there will not obstruct traffic.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit				
2	 <p><i>Route to leasing office.</i></p>	<p>The curb ramp and sidewalk leading to the leasing office is blocked by recycling can and the width is not accessible (minimum 36 inches required).</p>	<p>Add a lease addendum in which property management will deposit recycling in container upon resident request.</p>				
3	 <p><i>Parking space & cross slope.</i></p>	<p>The designated parking space access aisle at the leasing office has a cross slope greater than 2% (maximum 2% allowed).</p> <p><u>Location</u></p> <table data-bbox="732 1019 1394 1138"> <tr> <td>Foot of access aisle</td> <td>5.5%</td> </tr> <tr> <td>Head of access aisle</td> <td>5.3%</td> </tr> </table>	Foot of access aisle	5.5%	Head of access aisle	5.3%	<p>Modify parking space and access aisle so that cross slope is 2% or less.</p>
Foot of access aisle	5.5%						
Head of access aisle	5.3%						

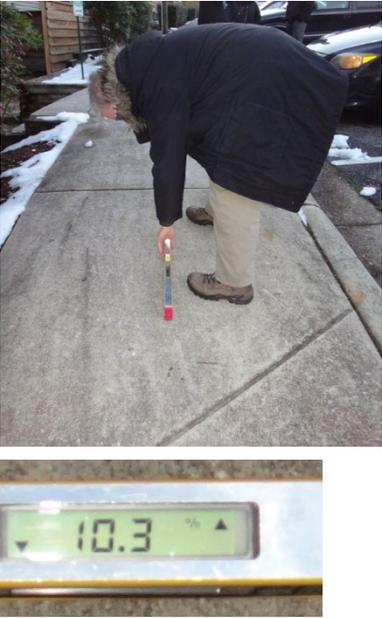
Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
7	 <p><i>Curb ramp leading towards Building 2.</i></p>	<p>Curb ramp cross slopes are more than 2.0% (maximum 2.0% allowed).</p> <p><u>Location</u></p> <p>North of entry drive 3.5%</p> <p>At leasing office 5.9%</p> <p>Bottom of curb ramp at south end of entry drive 13.3%</p> <p>Entry drive, west of trash dumpster 7.8%</p>	<p>Modify 3.5%, 5.9%, 13.3%, and 7.8% cross slopes to comply with ANSI 4.3.7.</p>
Protruding Objects			
8	 <p><i>Light fixture at entrance to leasing office.</i></p>	<p>The light fixture at entrance to leasing office protrudes approximately 5 inches into the circulation path (maximum 4 inches allowed).</p>	<p>Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>

Routes from Site Arrival Points to Common Areas and Covered Dwelling Units

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
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B. Inaccessible Features at Common Use Routes

10	 <p data-bbox="275 950 730 1023"><i>Inlet grate at Building 1 west entrance.</i></p>	<p data-bbox="730 316 1396 389">Gaps at the inlet grate at Building 1 west entrance are 1 inch wide (maximum 1/2 inch allowed).</p> <p data-bbox="730 430 1396 511"><i>Inlet grate at Building 1 west entrance. Measurement of typical gap in grate.</i></p>	<p data-bbox="1396 316 1703 430">Modify gap to comply with ANSI 4.5.</p>
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Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
11	 <p data-bbox="279 659 701 727"><i>Route at turn towards Building 1 unit entrances.</i></p>	<p data-bbox="730 220 1394 331">Cross slopes of the route North of Building 1 at the turn to Units 101, 102, 103, and 104 are more than 2% (maximum 2% allowed).</p>	<p data-bbox="1398 220 1715 370">Modify 5.5% cross slope to 3.0% maximum to comply with ANSI 4.3.7.</p>
12	<p data-bbox="279 740 701 808"><i>Sidewalk/ramp north of Building 1.</i></p> 	<p data-bbox="730 740 1394 818">Running slope of ramp at sidewalk north of Building 1 is 10.3% (maximum 8.3% allowed).</p>	<p data-bbox="1398 740 1715 818">Replace sidewalk to comply with ANSI.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	Inaccessible Curb Ramp Features		
13	 <p data-bbox="275 1133 604 1166"><i>Ramp north of Building 1</i></p>	<p data-bbox="732 326 1394 480">The running slope of the curb ramp apron north of Building 1 is 10.3% to 11.2% (maximum 10% allowed, ANSI 1986, maximum 8.3% at ramps).</p>	<p data-bbox="1400 326 1711 719">Install a new sidewalk to bypass this curb ramp to connect to walkway toward accessible parking space on the south side of the building or replace curb ramp with new sidewalk to comply with ANSI.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
14	 <p data-bbox="281 724 705 834"><i>Ramp north of Building 1 (shows level measuring running slope). 5.3% is cross slope reading.</i></p>	The cross slope of the curb ramp north of Building 1 is 5.3% (maximum 2.0% allowed).	Install a new sidewalk to bypass this curb ramp to connect to walkway toward accessible parking space on the south side of the building or replace curb ramp with new sidewalk to comply with ANSI.
Inaccessible Ramp Features			

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
15	 <p data-bbox="275 943 611 980"><i>Ramp north of Building 1.</i></p>	<p data-bbox="730 212 1423 415">The sidewalk north of Building 1 has slopes of 5.8%, 6.3%, 6.8%, and 7.2%; has a rise greater than 6 inches, is a ramp, and lacks handrails and edge protection (handrails and edge protection required on both sides).</p>	<p data-bbox="1423 212 1709 578">Modify 6.3%, 6.8% and 7.2% by installing handrails on both sides of walkway or replace walkway to provide 6% maximum running slopes to comply with ANSI.</p>
	<p data-bbox="275 980 548 1024">Protruding Objects</p>		

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
16		<p>Lights and fire extinguisher cabinets protrude approximately 7 inches into the circulation path (maximum 4 inches allowed where the bottom of the object is more than 27 inches and less than 80 inches above the adjacent walking surface).</p> <p><u>Locations:</u> West breezeway fire ext. cabinet East breezeway fire ext. cabinet East breezeway passage light fixture West breezeway passage light fixture Light fixture at Unit 101 entry Light fixture at Unit 102 entry Light fixture at Unit 103 entry Light fixture at Unit 104 entry Light fixture at Unit 105 entry Light fixture at Unit 106 entry Light fixture at Unit 107 entry Light fixture at Unit 108 entry</p>	<p>Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="275 618 701 690"><i>Light fixture at entry to Unit 108 (typical).</i></p>		

C. Common Use Areas

	Inaccessible Parking Feature		
17		At the parking north of Building 1, the designated parking aisle has cross slopes of 6.5% to 7.1% (maximum 2% allowed).	Modify 6.5% to 7.1% running slopes of access aisle to 5% maximum running slopes to compliant with ANSI.

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="275 418 590 456"><i>Parking north of Bldg. 1</i></p>		
	<p data-bbox="275 467 653 537">Inaccessible Common Area Features</p>		
18	 <p data-bbox="275 1203 653 1240"><i>Utility sink in Laundry Room.</i></p>	<p data-bbox="730 570 1367 808">The utility sink does not have the minimum clear floor space required for parallel approach. The sink is not centered on a 48- inch wide clear floor space (minimum 24 inches to center of controls required). The centerline is 20 inches from the adjacent equipment.</p>	<p data-bbox="1423 570 1709 646">Remediate to improve the condition.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
			
	<p data-bbox="283 548 548 581">Protruding Objects</p>		
19		<p data-bbox="739 626 1390 740">The laundry fire extinguisher protrudes 7-1/8 inches into the circulation path (maximum 4 inches allowed).</p>	<p data-bbox="1430 626 1703 854">Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="275 527 640 605"><i>Fire extinguisher cabinet in laundry room.</i></p>		

Exhibit 2.3

Marsh Creek Matrix of Required Retrofits to Covered Unit Interiors

MARSH CREEK APARTMENTS: COVERED UNIT INTERIORS

D. Covered Dwelling Units Unit Types by Building:

Building	Unit Types									Totals
	1st Floor (Covered Units)			2nd Floor			Third Floor			Covered Units
	1b1b	2b1b	3b2b	1b1b	2b1b	3b2b	1b1b	2b1b	3b2b	
1	2	4	2	2	4	2	2	4	2	8

Note: no units were designated Accessible, Type A, or Type B on the plans.

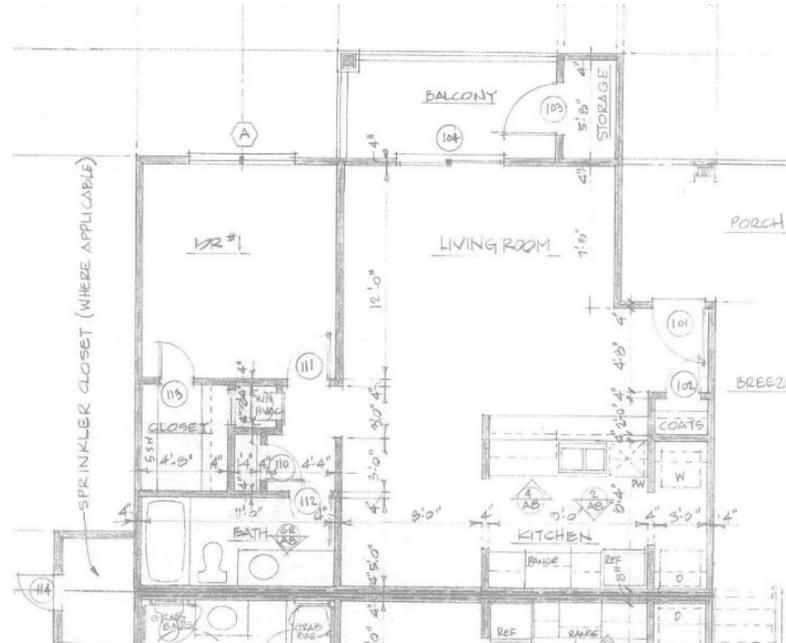
The survey included the following units:

Unit 105 – 1 Bedroom / 1 Bath Unit

Unit 102 – 2 Bedroom / 1 Bath Unit

Unit 107 – 3 Bedroom / 2 Bath Unit

UNIT TYPE: 1 Bedroom, 1 Bathroom
 Surveyed Unit 105 – Typical for 2 total units



Numbers	Photos	Deficiency	Required Retrofits

Numbers	Photos	Deficiency	Required Retrofits
20	 <p data-bbox="296 711 632 743"><i>Unit entry door threshold.</i></p>	<p data-bbox="751 305 1442 410">Primary unit entry door thresholds are 5/8 high and are not beveled at the interior side (maximum 1/4-inch change in level without bevel allowed).</p>	<p data-bbox="1459 305 1696 451">Modify door thresholds to comply with Requirement 4(4).</p>
21	 <p data-bbox="296 1317 730 1390"><i>Patio door threshold interior side at Unit 105.</i></p>	<p data-bbox="751 760 1442 946">Patio door threshold assemblies are 2-5/8 inches high and have changes in level greater than 1/4 inch that are not beveled (maximum 3/4-inch height allowed; maximum 1/4-inch change in level without bevel allowed).</p>	<p data-bbox="1459 760 1703 1068">Modify door thresholds upon resident request by installing a bevel on the interior side at a ratio of 1:2 to comply with Requirement 4(4).</p>

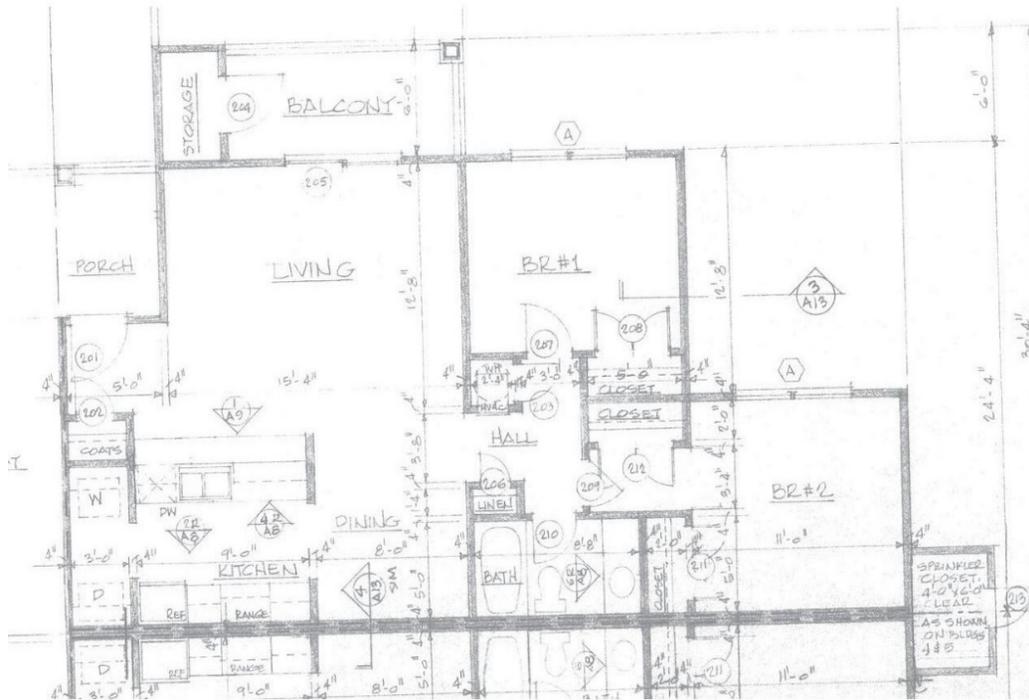
Numbers	Photos	Deficiency	Required Retrofits						
22		<p>The door clear opening is less than 31-5/8 inches (minimum 31-5/8 inch required).</p> <table border="0" data-bbox="751 418 1442 698"> <thead> <tr> <th data-bbox="751 461 873 493"><u>Location</u></th> <th data-bbox="1150 418 1306 493"><u>Clear Width (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="751 539 1100 613">Unit 105, patio screen door 5986.jpg</td> <td data-bbox="1180 539 1272 571">30-1/4</td> </tr> <tr> <td data-bbox="751 620 1062 695">Unit 105, walk-in closet 5970.jpg</td> <td data-bbox="1180 620 1272 652">22-1/4</td> </tr> </tbody> </table> <p>A minimum 31-5/8 inch clear opening width is required for doors intended for user passage. (Guidelines Requirement 3(2)).</p> <p><i>Clear patio door opening. (5986.jpg).</i></p>	<u>Location</u>	<u>Clear Width (inches)</u>	Unit 105, patio screen door 5986.jpg	30-1/4	Unit 105, walk-in closet 5970.jpg	22-1/4	<p>On request, modify screen door to provide 31 5/8" to comply with Requirement 3(2).</p> <p>For closet door, modify door to comply with Requirement 3(2).</p>
<u>Location</u>	<u>Clear Width (inches)</u>								
Unit 105, patio screen door 5986.jpg	30-1/4								
Unit 105, walk-in closet 5970.jpg	22-1/4								

Numbers	Photos	Deficiency	Required Retrofits						
23		<p>Outlet over the countertop is greater than 46 inches above the floor (maximum 46 inches allowed).</p> <table border="0" data-bbox="743 406 1451 617"> <tr> <td data-bbox="743 406 1113 487"><u>Location</u></td> <td data-bbox="1113 406 1451 487"><u>Height (inches)</u></td> </tr> <tr> <td data-bbox="743 487 1113 568"></td> <td data-bbox="1113 487 1451 568"><u>Photo</u></td> </tr> <tr> <td data-bbox="743 568 1113 617">Unit 105, kitchen</td> <td data-bbox="1113 568 1451 617">49-7/8 5952.jpg</td> </tr> </table> <p>A maximum 46 inches is allowed for the reach range over an obstruction 20 inches or more. (Guidelines, Requirement 5).</p> <p><i>Height of kitchen countertop in Unit 105. (5951.jpg). Outlet over countertop in Unit 105. (5952.jpg).</i></p> <p>Note: bathroom outlet not measured – blocked with personal items. See Unit 107.</p>	<u>Location</u>	<u>Height (inches)</u>		<u>Photo</u>	Unit 105, kitchen	49-7/8 5952.jpg	<p>Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
<u>Location</u>	<u>Height (inches)</u>								
	<u>Photo</u>								
Unit 105, kitchen	49-7/8 5952.jpg								

Numbers	Photos	Deficiency	Required Retrofits
23a.		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide an affidavit to confirm reinforcements are installed to comply with Requirement 6.
24		<p>The shape of the bathtub surrounds preclude the installation of future grab bars with firm attachment to blocking (ability to install grab bars required).</p> <p><u>Location</u></p> <p>Unit 105</p> <p style="text-align: right;">Photo 5975.jpg</p> <p>Reinforcement is required for the future installation of grab bars and shower seats at toilets, bathtubs and shower compartments. (Guidelines, Requirement 6).</p> <p><i>Bathtub/shower surround in Unit 105. (5975.jpg).</i></p>	Remediate upon resident request.

Numbers	Photos	Deficiency	Required Retrofits
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UNIT TYPE: 2 Bedroom, 1 Bathroom
 Surveyed Unit 102 – Typical for 4 total units



Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofits								
25		<p>Primary unit entry door thresholds are greater than 1/4 inch high and are not beveled at the interior side (maximum 1/4-inch change in level without bevel allowed).</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"></td> <td style="text-align: center;">Height</td> </tr> <tr> <td style="border-bottom: 1px solid black;"><u>Location</u></td> <td style="text-align: center;"><u>(inches)</u></td> </tr> <tr> <td></td> <td style="text-align: center;">Photo</td> </tr> <tr> <td>Unit 102, front door</td> <td style="text-align: center;">3/4 5992.jpg</td> </tr> </table> <p>A maximum 1/4-inch vertical change in level is allowed without a bevel. (Guidelines Requirement 4(2); ANSI 1986 4.5.2).</p> <p><i>Main entry threshold at Unit 102. (5992.jpg).</i></p>		Height	<u>Location</u>	<u>(inches)</u>		Photo	Unit 102, front door	3/4 5992.jpg	<p>Modify door thresholds to comply with Requirement 4(4).</p>
	Height										
<u>Location</u>	<u>(inches)</u>										
	Photo										
Unit 102, front door	3/4 5992.jpg										

Numbers	Photos	Deficiency	Required Retrofits				
27		<p>The door clear opening is less than 31-5/8 inches (minimum 31-5/8 inch required).</p> <table border="0" data-bbox="743 418 1451 617"> <tr> <td data-bbox="743 418 1129 493"><u>Location</u></td> <td data-bbox="1129 418 1451 493">Clear Width (inches)</td> </tr> <tr> <td data-bbox="743 493 1129 617">Unit 102</td> <td data-bbox="1129 493 1451 617">Photo 29-3/4 6037.jpg</td> </tr> </table> <p>A minimum 31-5/8 inch clear opening width is required for doors intended for user passage. (Guidelines Requirement 3(2)).</p> <p><i>Clear patio door opening. (6037.jpg).</i></p>	<u>Location</u>	Clear Width (inches)	Unit 102	Photo 29-3/4 6037.jpg	<p>For sliding door, upon resident request, trim door stop to provide 31 5/8" to comply with Requirement 3(2).</p>
<u>Location</u>	Clear Width (inches)						
Unit 102	Photo 29-3/4 6037.jpg						
27a.		<p>Extent of blocking in bathrooms cannot be determined without destructive testing.</p>	<p>Provide an affidavit to confirm reinforcements are installed to comply with requirement 6.</p>				

Numbers	Photos	Deficiency	Required Retrofits				
28		<p>The shape of the bathtub surrounds preclude the installation of future grab bars with firm attachment to blocking (ability to install grab bars required).</p> <table border="0" data-bbox="743 456 1451 574"> <tr> <td data-bbox="743 456 1050 492"><u>Location</u></td> <td data-bbox="1050 456 1451 492"><u>Photo</u></td> </tr> <tr> <td data-bbox="743 532 1050 574">Unit 102</td> <td data-bbox="1050 532 1451 574">6021.jpg</td> </tr> </table>	<u>Location</u>	<u>Photo</u>	Unit 102	6021.jpg	Remediate upon resident request.
<u>Location</u>	<u>Photo</u>						
Unit 102	6021.jpg						
28a.		<p>Reinforcement is required for the future installation of grab bars and shower seats at toilets, bathtubs and shower compartments. (Guidelines, Requirement 6).</p> <p><i>Bathtub/shower surround in Unit 102. (6021.jpg).</i></p>	Provide an affidavit to confirm reinforcements are installed to comply with requirement 6.				

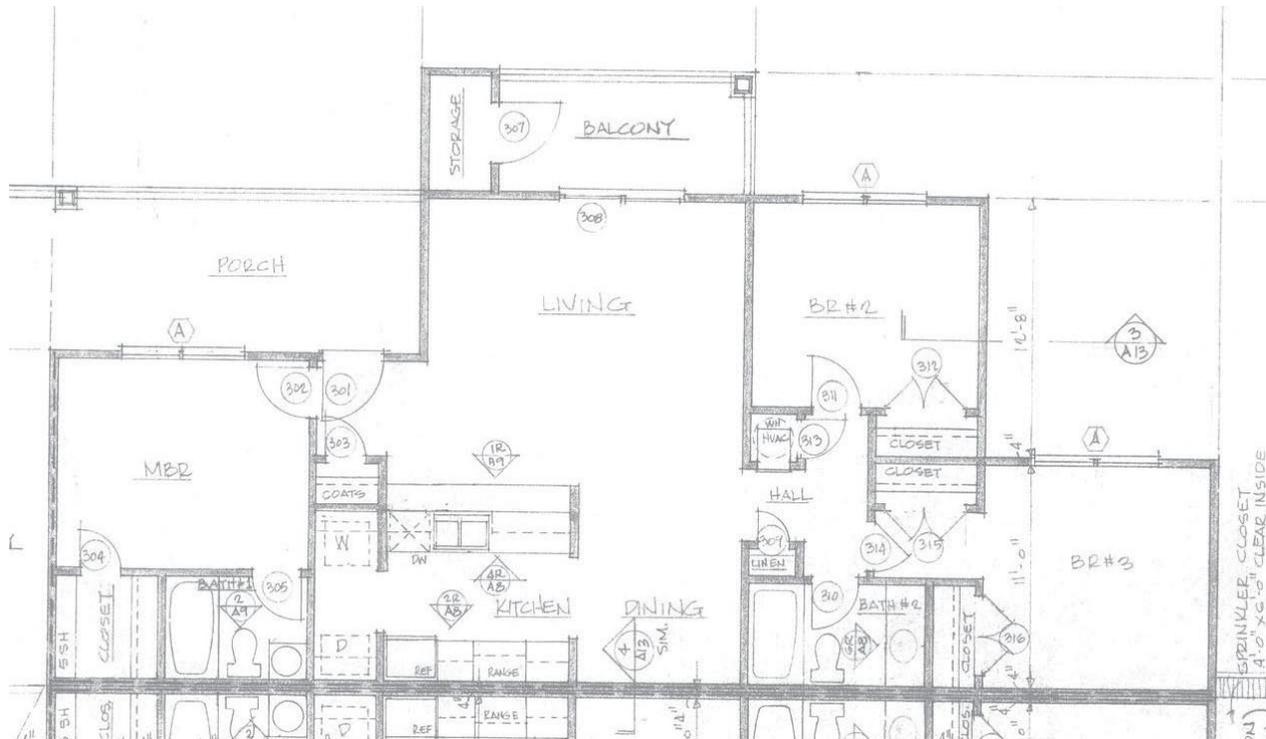
Numbers	Photos	Deficiency	Required Retrofits								
29		<p>The lavatory centerlines are less than 24 inches to the side wall (minimum 24 inches required) and the cabinets are not removable.</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"></td> <td style="text-align: right;">Distance</td> </tr> <tr> <td style="border-bottom: 1px solid black;"><u>Location</u></td> <td style="text-align: right; border-bottom: 1px solid black;"><u>(inches)</u></td> </tr> <tr> <td></td> <td style="text-align: right;">Photo</td> </tr> <tr> <td>Unit 102, bathroom</td> <td style="text-align: right;">21-1/2 6025.jpg</td> </tr> </table> <p>A minimum 30 by 48-inch clear floor space centered on the lavatory is required for parallel approach unless the cabinet is either removable or not provided. (Guidelines Requirement 7 (2)(a)(ii)).</p> <p><i>Dimension from side wall to centerline of lavatory in Unit 102. (6025.jpg).</i></p> <p><i>Vanity base interior in Unit 102. (6026.jpg). Vanity base in Unit 102. (6018.jpg).</i></p>		Distance	<u>Location</u>	<u>(inches)</u>		Photo	Unit 102, bathroom	21-1/2 6025.jpg	<p>Install removable base cabinet to provide clear floor space to comply with Requirement 7(2)(a)(ii).</p>
	Distance										
<u>Location</u>	<u>(inches)</u>										
	Photo										
Unit 102, bathroom	21-1/2 6025.jpg										

Numbers	Photos	Deficiency	Required Retrofits

Numbers	Photos	Deficiency	Required Retrofits
31		<p>The clear floor space in the bathroom is less than 48 inches long (minimum 48 inches required).</p> <p>Clear Dimension <u>Location</u> (inches) Photo</p> <p>Unit 102 38-1/8 6031.jpg</p> <p>A minimum 30 inch by 48 inch clear floor space is required clear of the door swing in a bathroom. (Guidelines Requirement 7 (2)(a)(i) and Figure 6).</p> <p>Bathroom door leaf in open position at Unit 102. (6030.jpg). Dimension from door leaf in open position to rear wall. (6031.jpg).</p>	Reverse the door swing out to comply with Requirement 7(2)(a)(1) Figure 6.

Numbers	Photos	Deficiency	Required Retrofits
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UNIT TYPE: 3 Bedroom, 2 Bathroom
 Surveyed Unit 107 – Typical for 2 total units



Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofits												
32		<p>Door threshold assemblies are more than 3/4 inches high and have changes in level greater than 1/4 inch that are not beveled (maximum 3/4-inch height allowed; maximum 1/4-inch change in level without bevel allowed).</p> <table border="0" data-bbox="743 535 1451 779"> <thead> <tr> <th data-bbox="743 576 865 609"><u>Location</u></th> <th data-bbox="1144 535 1262 609">Height (inches)</th> <th data-bbox="1144 617 1234 649">Photo</th> </tr> </thead> <tbody> <tr> <td data-bbox="743 657 1129 690">Unit 107, patio (interior face)</td> <td data-bbox="1176 657 1262 690">2-3/4</td> <td data-bbox="1302 657 1430 690">5929.jpg</td> </tr> <tr> <td data-bbox="743 698 972 730">Unit 107, storage</td> <td data-bbox="1176 698 1262 730">1-1/4</td> <td></td> </tr> <tr> <td data-bbox="743 738 1075 771">Level change not beveled</td> <td data-bbox="1192 738 1245 771">7/8</td> <td data-bbox="1302 738 1430 771">5936.jpg</td> </tr> </tbody> </table> <p>A maximum 3/4 inch high threshold with bevel is allowed at unit doors. (Guidelines, Requirement 4 (4)).</p> <p>A maximum 3/4 inch threshold height with bevel is allowed at exterior doors that are not the primary entry door. (Guidelines Requirement 4 (4)).</p> <p><i>Patio door threshold interior side at Unit 107. (5929.jpg).</i></p>	<u>Location</u>	Height (inches)	Photo	Unit 107, patio (interior face)	2-3/4	5929.jpg	Unit 107, storage	1-1/4		Level change not beveled	7/8	5936.jpg	<p>Modify door thresholds by installing a bevel on the interior side at a ratio of 1:2 to comply with Requirement 4(4).</p>
<u>Location</u>	Height (inches)	Photo													
Unit 107, patio (interior face)	2-3/4	5929.jpg													
Unit 107, storage	1-1/4														
Level change not beveled	7/8	5936.jpg													

Numbers	Photos	Deficiency	Required Retrofits															
33		<p>The door clear openings are less than 31-5/8 inches (minimum 31-5/8 inch required).</p> <table border="0" data-bbox="751 418 1442 738"> <thead> <tr> <th data-bbox="751 461 865 488"><u>Location</u></th> <th data-bbox="1150 418 1304 488">Clear Width (inches)</th> <th data-bbox="1150 500 1234 527">Photo</th> </tr> </thead> <tbody> <tr> <td data-bbox="751 581 905 609">107, storage</td> <td data-bbox="1150 581 1247 609">29-1/2</td> <td data-bbox="1289 581 1409 609">5938.jpg</td> </tr> <tr> <td data-bbox="751 620 947 647">Depth of closet</td> <td data-bbox="1150 620 1247 647">35-1/8</td> <td data-bbox="1289 620 1409 647">5934.jpg</td> </tr> <tr> <td data-bbox="751 659 995 686">107, walk-in closet</td> <td data-bbox="1150 659 1184 686">28</td> <td data-bbox="1289 659 1409 686">5921.jpg</td> </tr> <tr> <td data-bbox="751 698 877 725">107, patio</td> <td data-bbox="1150 698 1184 725">30</td> <td data-bbox="1289 698 1409 725">5926.jpg</td> </tr> </tbody> </table> <p>A minimum 31-5/8 inch clear opening width is required for doors intended for user passage. (Guidelines Requirement 3(2)).</p> <p><i>Clear door opening at storage closet. (5938.jpg).</i></p>	<u>Location</u>	Clear Width (inches)	Photo	107, storage	29-1/2	5938.jpg	Depth of closet	35-1/8	5934.jpg	107, walk-in closet	28	5921.jpg	107, patio	30	5926.jpg	<p>For sliding door, upon resident request, trim door stop to provide 31 5/8" to comply with Requirement 3(2).</p> <p>For storage door, modify door on-request to comply with Requirement 3(2).</p> <p>For closet doors, modify door to comply with Requirement 3(2).</p>
<u>Location</u>	Clear Width (inches)	Photo																
107, storage	29-1/2	5938.jpg																
Depth of closet	35-1/8	5934.jpg																
107, walk-in closet	28	5921.jpg																
107, patio	30	5926.jpg																

Numbers	Photos	Deficiency	Required Retrofits						
34		<p>Outlet over the countertop is greater than 46 inches above the floor (maximum 46 inches allowed).</p> <table border="0" data-bbox="743 406 1451 617"> <tr> <td data-bbox="743 406 1134 487"><u>Location</u></td> <td data-bbox="1134 406 1451 487"><u>Height (inches)</u></td> </tr> <tr> <td data-bbox="743 487 1134 535"></td> <td data-bbox="1134 487 1451 535"><u>Photo</u></td> </tr> <tr> <td data-bbox="743 535 1134 617">Unit 107, hall bathroom</td> <td data-bbox="1134 535 1451 617">49-3/4 5888.jpg</td> </tr> </table> <p>A maximum 46 inches is allowed for the reach range over an obstruction 20 inches or more. (Guidelines, Requirement 5).</p> <p><i>Height of vanity countertop in Unit 107. (5887.jpg).</i> <i>Outlet over countertop in Unit 107. (5888.jpg).</i></p> <p>Note: height of outlets at stove wall not measured. Appear high in photos. See Unit 105.</p>	<u>Location</u>	<u>Height (inches)</u>		<u>Photo</u>	Unit 107, hall bathroom	49-3/4 5888.jpg	<p>Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
<u>Location</u>	<u>Height (inches)</u>								
	<u>Photo</u>								
Unit 107, hall bathroom	49-3/4 5888.jpg								

Numbers	Photos	Deficiency	Required Retrofits						
34a.		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide an affidavit to confirm reinforcements are installed to comply with requirement 6.						
35		<p>The shape of the bathtub surrounds preclude the installation of future grab bars with firm attachment to blocking (ability to install grab bars required).</p> <p><u>Location</u></p> <table border="0" data-bbox="743 878 1339 997"> <tr> <td></td> <td style="text-align: right;">Photo</td> </tr> <tr> <td>Unit 107, hall bathroom</td> <td style="text-align: right;">5896.jpg</td> </tr> <tr> <td>Unit 107, master bathroom</td> <td style="text-align: right;">5914.jpg</td> </tr> </table> <p>Reinforcement is required for the future installation of grab bars and shower seats at toilets, bathtubs and shower compartments. (Guidelines, Requirement 6).</p> <p><i>Bathtub/shower surround in Unit 102. (5896.jpg).</i></p>		Photo	Unit 107, hall bathroom	5896.jpg	Unit 107, master bathroom	5914.jpg	Remediate upon resident request.
	Photo								
Unit 107, hall bathroom	5896.jpg								
Unit 107, master bathroom	5914.jpg								

Numbers	Photos	Deficiency	Required Retrofits									
36		<p>The lavatory centerlines are less than 24 inches to the side wall (minimum 24 inches required) and the cabinets are not removable.</p> <table border="0" data-bbox="743 454 1451 698"> <thead> <tr> <th data-bbox="743 495 1123 527"><u>Location</u></th> <th data-bbox="1123 454 1451 527"><u>Distance (inches)</u></th> <th data-bbox="1123 527 1451 576"><u>Photo</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="743 617 1123 649">Unit 107, hall bathroom</td> <td data-bbox="1123 617 1451 649">22-1/8</td> <td data-bbox="1123 617 1451 649">5890.jpg</td> </tr> <tr> <td data-bbox="743 657 1123 690">Unit 107, master bathroom</td> <td data-bbox="1123 657 1451 690">21-3/4</td> <td data-bbox="1123 657 1451 690">5911.jpg</td> </tr> </tbody> </table> <p>A minimum 30 by 48-inch clear floor space centered on the lavatory is required for parallel approach unless the cabinet is either removable or not provided. (Guidelines Requirement 7 (2)(a)(ii)).</p> <p>Dimension from side wall to centerline of lavatory in Unit 107. (5911.jpg). Vanity base in Unit 107. (5908.jpg).</p>	<u>Location</u>	<u>Distance (inches)</u>	<u>Photo</u>	Unit 107, hall bathroom	22-1/8	5890.jpg	Unit 107, master bathroom	21-3/4	5911.jpg	<p>Install removable base cabinet to provide clear floor space to comply with Requirement 7(2)(a)(ii).</p>
<u>Location</u>	<u>Distance (inches)</u>	<u>Photo</u>										
Unit 107, hall bathroom	22-1/8	5890.jpg										
Unit 107, master bathroom	21-3/4	5911.jpg										

Numbers	Photos	Deficiency	Required Retrofits									
37		<p>The clear floor space in the bathroom is less than 48-inches long (minimum 48-inches required).</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px solid black;">Location</th> <th style="text-align: right; border-bottom: 1px solid black;">Clear Dimension (inches)</th> <th style="text-align: right; border-bottom: 1px solid black;">Photo</th> </tr> </thead> <tbody> <tr> <td>Unit 107, hall bathroom</td> <td style="text-align: right;">40-3/4</td> <td style="text-align: right;">5898.jpg</td> </tr> <tr> <td>Unit 107, master bathroom</td> <td style="text-align: right;">35</td> <td style="text-align: right;">5916.jpg</td> </tr> </tbody> </table> <p>A minimum 30-inch by 48-inch clear floor space is required clear of the door swing in a bathroom. (Guidelines, Requirement 7 (2)(a)(i) and Figure 6).</p>	Location	Clear Dimension (inches)	Photo	Unit 107, hall bathroom	40-3/4	5898.jpg	Unit 107, master bathroom	35	5916.jpg	Reverse the door swing out to comply with Requirement 7(2)(a)(1) Figure 6.
Location	Clear Dimension (inches)	Photo										
Unit 107, hall bathroom	40-3/4	5898.jpg										
Unit 107, master bathroom	35	5916.jpg										

Numbers	Photos	Deficiency	Required Retrofits
		<p><i>Bathroom door leaf in open position at Unit 107. (5897.jpg).</i></p> <p><i>Dimension from door leaf in open position to rear wall. (5898.jpg).</i></p> <p><i>Length of space between edge of door opening and face of tub at master bath. (5917.jpg).</i></p>	

EXHIBIT 3.1

Hodges Creek Accessible Route

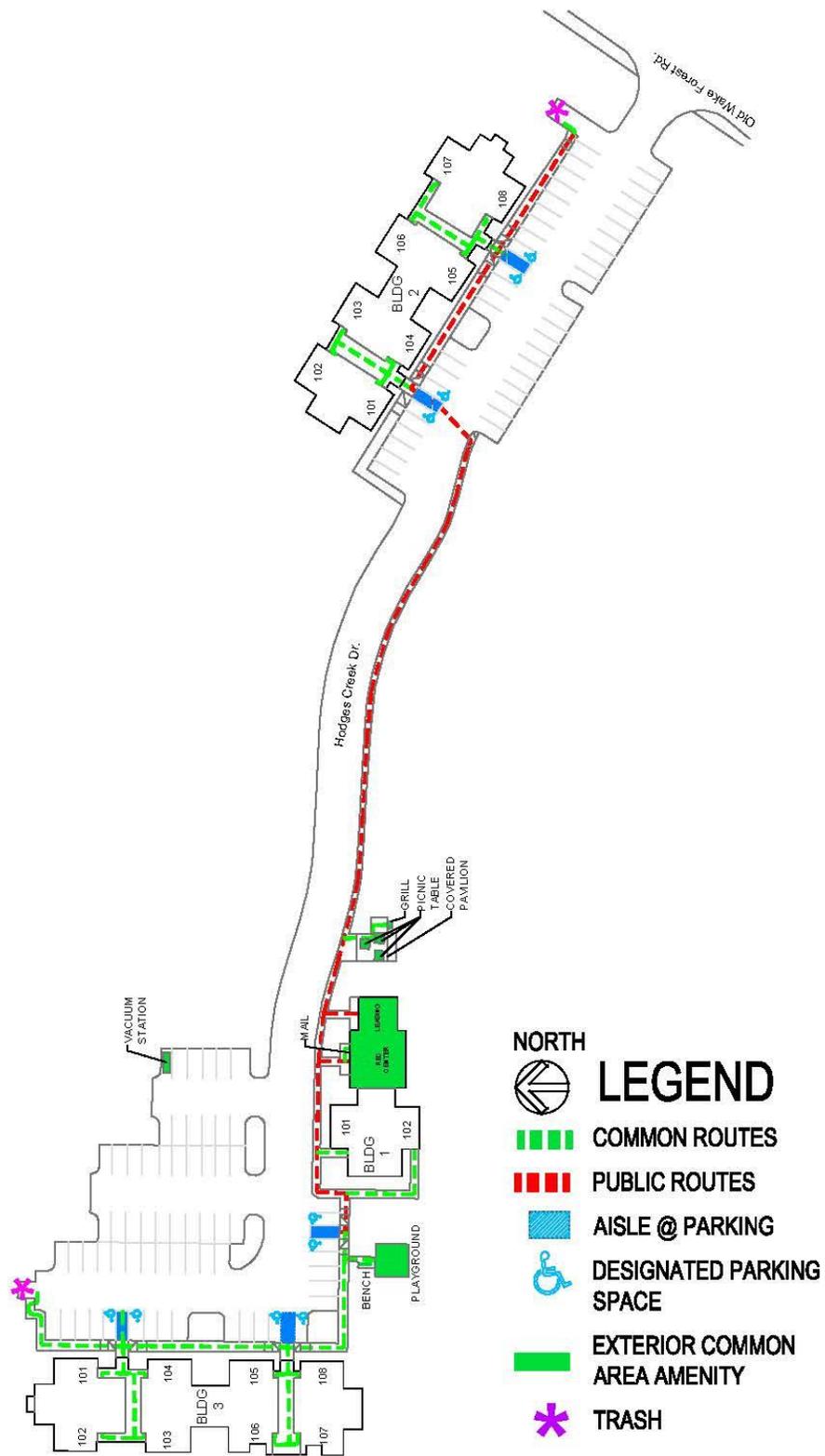


Exhibit 3.2

Hodges Creek Matrix of Required Retrofits to Public and Common Use Areas

HODGES CREEK APARTMENTS: PUBLIC AND COMMON USE AREAS

A. Inaccessible Features at Public and Common Use Routes and Areas:

Numbers	Photos	Deficiency	Required Retrofit																		
Inaccessible Slopes at Sidewalks																					
2	 <p><i>End of parking row northwest of Building 1.</i></p>  <p><i>Measurement of cross slope.</i></p>	<p>Cross slopes of the route are more than 2% (maximum 2% allowed).</p> <table border="1" data-bbox="732 651 1409 1057"> <thead> <tr> <th><u>Location</u></th> <th><u>Slope</u></th> </tr> </thead> <tbody> <tr> <td>Bldg. 2 east of east breezeway</td> <td>4.0%</td> </tr> <tr> <td>Building 2 east curb ramp</td> <td>6.1%</td> </tr> <tr> <td>Bldg. 2 west of east breezeway</td> <td>4.2%</td> </tr> <tr> <td>Bldg. 2 east of west breezeway</td> <td>5.4%</td> </tr> <tr> <td>Building 2 west curb ramp</td> <td>6.1%</td> </tr> <tr> <td>East end of south sidewalk</td> <td>4.4%</td> </tr> <tr> <td>South side of curb ramp at sidewalk to playground</td> <td>5.3%</td> </tr> <tr> <td>Curb ramp at sidewalk to playground</td> <td>8.2%</td> </tr> </tbody> </table>	<u>Location</u>	<u>Slope</u>	Bldg. 2 east of east breezeway	4.0%	Building 2 east curb ramp	6.1%	Bldg. 2 west of east breezeway	4.2%	Bldg. 2 east of west breezeway	5.4%	Building 2 west curb ramp	6.1%	East end of south sidewalk	4.4%	South side of curb ramp at sidewalk to playground	5.3%	Curb ramp at sidewalk to playground	8.2%	<p>Modify cross slopes in walkways over 3.0% and curb ramps over 3.3%: 4.0%, 6.1%, 4.2%, 5.4%, 4.4%, 5.3%, 8.2% cross slopes to comply with ANSI 4.3.7 and 4.7.2.</p>
<u>Location</u>	<u>Slope</u>																				
Bldg. 2 east of east breezeway	4.0%																				
Building 2 east curb ramp	6.1%																				
Bldg. 2 west of east breezeway	4.2%																				
Bldg. 2 east of west breezeway	5.4%																				
Building 2 west curb ramp	6.1%																				
East end of south sidewalk	4.4%																				
South side of curb ramp at sidewalk to playground	5.3%																				
Curb ramp at sidewalk to playground	8.2%																				
Inaccessible Curb Ramp Features																					

Numbers	Photos	Deficiency	Required Retrofit						
3	 <p><i>Curb ramp southeast of Building 2.</i></p>  <p><i>Measurement of running slope.</i></p>	<p>The running slope of the curb ramp is more than 8.3% (maximum 8.3% allowed).</p> <table border="1" data-bbox="730 367 1205 509"> <thead> <tr> <th><u>Location</u></th> <th><u>Slope</u></th> </tr> </thead> <tbody> <tr> <td>Southeast of Building 2 at dumpster</td> <td>15.3%</td> </tr> <tr> <td>East end of south sidewalk</td> <td>11.3%</td> </tr> </tbody> </table>	<u>Location</u>	<u>Slope</u>	Southeast of Building 2 at dumpster	15.3%	East end of south sidewalk	11.3%	<p>Modify running slopes of curb ramps over 8.3%: 15.3% and 11.3% to comply with ANSI.</p>
<u>Location</u>	<u>Slope</u>								
Southeast of Building 2 at dumpster	15.3%								
East end of south sidewalk	11.3%								
	Protruding Objects								

Numbers	Photos	Deficiency	Required Retrofit																				
4	 <p><i>Fire extinguisher cabinet at entrance to leasing office.</i></p>  <p><i>Protruding height.</i></p>  <p><i>Protruding depth.</i></p>  <p><i>Drinking fountain in community room.</i></p>	<p>Elements protrude more than 4 inches into the circulation path (maximum 4 inches allowed).</p> <table border="0"> <thead> <tr> <th style="text-align: left;"><u>Location</u></th> <th style="text-align: left;"><u>Distance (inches)</u></th> </tr> </thead> <tbody> <tr> <td colspan="2">Leasing Office Entry fire extinguisher cabinet:</td> </tr> <tr> <td>Depth of protrusion</td> <td>6-3/4</td> </tr> <tr> <td>Height to leading edge</td> <td>41-1/2</td> </tr> <tr> <td colspan="2">Community Room drinking fountain:</td> </tr> <tr> <td>Depth of protrusion</td> <td>18-1/2</td> </tr> <tr> <td>Height to leading edge</td> <td>32</td> </tr> <tr> <td colspan="2">Community Room fire extinguisher</td> </tr> <tr> <td>Depth of protrusion</td> <td>4-1/2</td> </tr> <tr> <td>Height to leading edge</td> <td>42-3/8</td> </tr> </tbody> </table>	<u>Location</u>	<u>Distance (inches)</u>	Leasing Office Entry fire extinguisher cabinet:		Depth of protrusion	6-3/4	Height to leading edge	41-1/2	Community Room drinking fountain:		Depth of protrusion	18-1/2	Height to leading edge	32	Community Room fire extinguisher		Depth of protrusion	4-1/2	Height to leading edge	42-3/8	<p>Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>
<u>Location</u>	<u>Distance (inches)</u>																						
Leasing Office Entry fire extinguisher cabinet:																							
Depth of protrusion	6-3/4																						
Height to leading edge	41-1/2																						
Community Room drinking fountain:																							
Depth of protrusion	18-1/2																						
Height to leading edge	32																						
Community Room fire extinguisher																							
Depth of protrusion	4-1/2																						
Height to leading edge	42-3/8																						

Numbers	Photos	Deficiency	Required Retrofit
	 <p><i>Protruding height.</i></p>  <p><i>Protruding depth.</i></p>		
	Inaccessible Restroom Features		

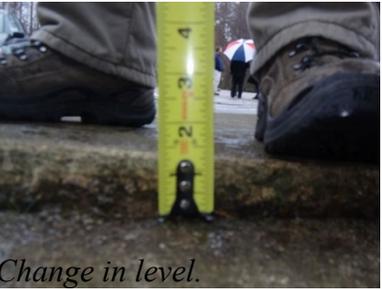
Numbers	Photos	Deficiency	Required Retrofit
5	 	<p>The side wall grab bar at the women's restroom extends 51-1/4 inches from the rear wall (minimum 54 inches required).</p>	<p>Relocate grab bar to comply with ANSI 4.17.6.</p>

Numbers	Photos	Deficiency	Required Retrofit						
6	 <p><i>Toilet in men's restroom.</i></p>  <p><i>Measurement from wall to grab bar.</i></p>  <p><i>Measurement from wall to opposite end of grab bar</i></p>	<p>The rear wall grab bars in the Community Room restrooms are 24 inches long (minimum 36 inches required).</p> <table border="1" data-bbox="726 370 1209 509"> <thead> <tr> <th data-bbox="726 402 1050 435">Location</th> <th data-bbox="1050 370 1209 435">Length (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="726 441 1050 474">Men's restroom</td> <td data-bbox="1050 441 1209 474">24</td> </tr> <tr> <td data-bbox="726 480 1050 509">Women's restroom</td> <td data-bbox="1050 480 1209 509">24</td> </tr> </tbody> </table>	Location	Length (inches)	Men's restroom	24	Women's restroom	24	<p>Relocate grab bar to comply with ANSI 4.17.6.</p>
Location	Length (inches)								
Men's restroom	24								
Women's restroom	24								

Numbers	Photos	Deficiency	Required Retrofit						
7	 <p><i>Dispenser in women's restroom.</i></p>  <p><i>Height of dispenser control.</i></p>	<p>The paper towel dispensers are more than 48 inches above the floor (maximum 48 inches allowed).</p> <table border="1" data-bbox="730 370 1411 519"> <thead> <tr> <th data-bbox="730 402 1087 435">Location</th> <th data-bbox="1087 370 1411 435">Height (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="730 441 1087 474">Men's restroom</td> <td data-bbox="1087 441 1411 474">51</td> </tr> <tr> <td data-bbox="730 480 1087 513">Women's restroom</td> <td data-bbox="1087 480 1411 513">49-1/4</td> </tr> </tbody> </table>	Location	Height (inches)	Men's restroom	51	Women's restroom	49-1/4	<p>Accept proposed fix. Modify paper towel dispenser to comply with ANSI 4.25.3.</p>
Location	Height (inches)								
Men's restroom	51								
Women's restroom	49-1/4								

Numbers	Photos	Deficiency	Required Retrofit
8	 <p data-bbox="277 597 659 667"><i>Hardware at men's restroom door.</i></p>	The men's and women's restroom doors have locking hardware which requires tight grasping, pinching, or twisting of the wrist (not allowed).	Modify hardware to comply with ANSI 4.13.9
<p data-bbox="134 748 940 781">B. INACCESSIBLE ROUTES AT COMMON AREAS</p> <p data-bbox="134 789 1213 821"><u>Routes from Site Arrival Points to Common Areas and Covered Dwelling Units</u></p>			
<p data-bbox="134 878 653 911"><u>Inaccessible Features – Hodges Creek</u></p>			
	<p data-bbox="277 919 617 951">Lack of Accessible Route</p>		

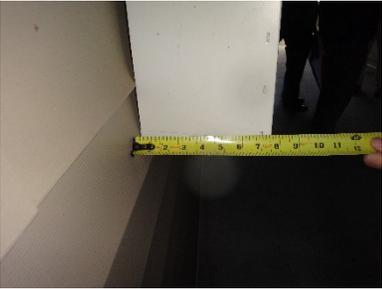
Numbers	Photos	Deficiency	Required Retrofit
9	 <p><i>Trash/Recycling area adjacent to Building 3</i></p>  <p><i>Looking toward car care center from Building 3.</i></p>	There is no accessible route between unit entrances and common use areas (accessible route required).	Fix to comply with Requirement 2.
	Inaccessible Changes in Level		

Numbers	Photos	Deficiency	Required Retrofit								
10	 <p><i>Sidewalk leading to playground.</i></p>  <p><i>Change in level.</i></p>	<p>The route has change in level greater than 1/2 inch (maximum 1/2 inch with bevel allowed).</p> <table border="1" data-bbox="730 370 1209 587"> <thead> <tr> <th data-bbox="730 402 1066 435">Location</th> <th data-bbox="1108 370 1209 435">Height (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="730 441 1066 474">Route to Playground</td> <td data-bbox="1108 441 1209 474">1-1/4</td> </tr> <tr> <td data-bbox="730 480 1066 513">Building 3, north breezeway</td> <td data-bbox="1108 480 1209 513">5/8</td> </tr> <tr> <td data-bbox="730 519 1066 587">Northeast of Building 3 at (dumpster)</td> <td data-bbox="1108 519 1209 587">Step</td> </tr> </tbody> </table>	Location	Height (inches)	Route to Playground	1-1/4	Building 3, north breezeway	5/8	Northeast of Building 3 at (dumpster)	Step	<p>Modify level change to comply with ANSI 4.5.2.</p>
Location	Height (inches)										
Route to Playground	1-1/4										
Building 3, north breezeway	5/8										
Northeast of Building 3 at (dumpster)	Step										
	Inaccessible Slopes										

Numbers	Photos	Deficiency	Required Retrofit								
11	 <p><i>Sidewalk between Buildings 1 and 3.</i></p>  <p><i>Measurement of cross slope.</i></p>	<p>The cross slopes of the route are more than 2% (maximum 2% allowed).</p> <table border="0"> <thead> <tr> <th><u>Location</u></th> <th><u>Slope</u></th> </tr> </thead> <tbody> <tr> <td>Above curb ramp at sidewalk to playground going south</td> <td>4.1%</td> </tr> <tr> <td>Above curb ramp at sidewalk to playground going west</td> <td>3.4%</td> </tr> <tr> <td>Building 3 north curb ramp</td> <td>4.3%</td> </tr> </tbody> </table>	<u>Location</u>	<u>Slope</u>	Above curb ramp at sidewalk to playground going south	4.1%	Above curb ramp at sidewalk to playground going west	3.4%	Building 3 north curb ramp	4.3%	<p>Modify cross slopes in walkways over 3.0% and curb ramps over 3.3%: 4.1%, 3.4%, 4.3% cross slopes to comply with ANSI 4.3.7 and 4.7.2.</p>
<u>Location</u>	<u>Slope</u>										
Above curb ramp at sidewalk to playground going south	4.1%										
Above curb ramp at sidewalk to playground going west	3.4%										
Building 3 north curb ramp	4.3%										
<p>Inaccessible Slope at Door Maneuvering Space</p>											

Numbers	Photos	Deficiency	Required Retrofit																										
12	 <p><i>Door at Unit 2051-108 – Building 2.</i></p>  <p><i>Measurement of slope at maneuvering clearance.</i></p>	<p>Unit entry door maneuvering clearances are sloped greater than 2.0% (maximum 2% allowed).</p> <table border="0"> <thead> <tr> <th><u>Location</u></th> <th><u>Slope</u></th> </tr> </thead> <tbody> <tr> <td colspan="2">Building 2 east breezeway:</td> </tr> <tr> <td>Unit 105</td> <td>4.4%</td> </tr> <tr> <td>Unit 106</td> <td>4.0%</td> </tr> <tr> <td>Unit 107</td> <td>6.2%</td> </tr> <tr> <td>Unit 108</td> <td>7.0%</td> </tr> <tr> <td colspan="2">Building 3 north breezeway:</td> </tr> <tr> <td>Unit 101</td> <td>3.4%</td> </tr> <tr> <td>Unit 102</td> <td>3.3%</td> </tr> <tr> <td>Unit 103</td> <td>3.6%</td> </tr> <tr> <td colspan="2">Building 3 south breezeway:</td> </tr> <tr> <td>Unit 106</td> <td>3.2%</td> </tr> <tr> <td>Unit 108</td> <td>2.8%</td> </tr> </tbody> </table>	<u>Location</u>	<u>Slope</u>	Building 2 east breezeway:		Unit 105	4.4%	Unit 106	4.0%	Unit 107	6.2%	Unit 108	7.0%	Building 3 north breezeway:		Unit 101	3.4%	Unit 102	3.3%	Unit 103	3.6%	Building 3 south breezeway:		Unit 106	3.2%	Unit 108	2.8%	<p>Modify unit entry door maneuvering clearances over 2.0% to comply with ANSI.</p>
<u>Location</u>	<u>Slope</u>																												
Building 2 east breezeway:																													
Unit 105	4.4%																												
Unit 106	4.0%																												
Unit 107	6.2%																												
Unit 108	7.0%																												
Building 3 north breezeway:																													
Unit 101	3.4%																												
Unit 102	3.3%																												
Unit 103	3.6%																												
Building 3 south breezeway:																													
Unit 106	3.2%																												
Unit 108	2.8%																												
Protruding Objects																													

Numbers	Photos	Deficiency	Required Retrofit																								
13	 <p><i>Fire extinguisher cabinet at Building 3 breezeway.</i></p>  <p><i>Protruding height.</i></p>	<p>The fire extinguisher cabinets at breezeways protrude more than 4 inches into the circulation path (maximum 4 inches allowed).</p> <table border="0"> <thead> <tr> <th style="text-align: left;"><u>Location</u></th> <th style="text-align: left;"><u>Distance (inches)</u></th> </tr> </thead> <tbody> <tr> <td colspan="2">Building 2 east breezeway:</td> </tr> <tr> <td style="padding-left: 20px;">Depth of protrusion</td> <td>7-1/2+/-</td> </tr> <tr> <td colspan="2">Building 2 west breezeway:</td> </tr> <tr> <td style="padding-left: 20px;">Depth of protrusion</td> <td>6-3/4+/-</td> </tr> <tr> <td colspan="2">Building 3 south breezeway:</td> </tr> <tr> <td style="padding-left: 20px;">Depth of protrusion</td> <td>7-1/2</td> </tr> <tr> <td style="padding-left: 20px;">Height of leading edge</td> <td>41-7/8</td> </tr> <tr> <td colspan="2">Building 3 Breezeway:</td> </tr> <tr> <td style="padding-left: 20px;">Depth of protrusion</td> <td>7-1/2+/- Kitchenette:</td> </tr> <tr> <td style="padding-left: 20px;">Depth of protrusion</td> <td>4-1/2</td> </tr> <tr> <td style="padding-left: 20px;">Height of leading edge</td> <td>51</td> </tr> </tbody> </table>	<u>Location</u>	<u>Distance (inches)</u>	Building 2 east breezeway:		Depth of protrusion	7-1/2+/-	Building 2 west breezeway:		Depth of protrusion	6-3/4+/-	Building 3 south breezeway:		Depth of protrusion	7-1/2	Height of leading edge	41-7/8	Building 3 Breezeway:		Depth of protrusion	7-1/2+/- Kitchenette:	Depth of protrusion	4-1/2	Height of leading edge	51	<p>Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>
<u>Location</u>	<u>Distance (inches)</u>																										
Building 2 east breezeway:																											
Depth of protrusion	7-1/2+/-																										
Building 2 west breezeway:																											
Depth of protrusion	6-3/4+/-																										
Building 3 south breezeway:																											
Depth of protrusion	7-1/2																										
Height of leading edge	41-7/8																										
Building 3 Breezeway:																											
Depth of protrusion	7-1/2+/- Kitchenette:																										
Depth of protrusion	4-1/2																										
Height of leading edge	51																										

Numbers	Photos	Deficiency	Required Retrofit						
	 <p data-bbox="275 574 506 607"><i>Protruding depth.</i></p>								
C. INACCESSIBLE FEATURES AT COMMON AREAS									
Inaccessible Environmental Controls									
14	 <p data-bbox="275 1214 680 1286"><i>Outlet at kitchenette countertop adjacent to refrigerator.</i></p>	<p data-bbox="732 768 1402 946">The countertop outlet does not have the minimum clear floor space required. Refrigerator blocks parallel approach. The clear space is less than 48 inches wide (minimum 48 inches required for parallel approach).</p> <table data-bbox="732 987 1402 1133"> <thead> <tr> <th data-bbox="732 1027 840 1057">Location</th> <th data-bbox="1100 987 1205 1057">Distance (inches)</th> <th data-bbox="1297 1062 1402 1094"></th> </tr> </thead> <tbody> <tr> <td data-bbox="732 1062 1205 1133">Kitchen, width of unobstructed space with countertop</td> <td data-bbox="1100 1062 1205 1094">28</td> <td data-bbox="1297 1062 1402 1094">parallel</td> </tr> </tbody> </table>	Location	Distance (inches)		Kitchen, width of unobstructed space with countertop	28	parallel	<p data-bbox="1421 768 1839 1128">Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
Location	Distance (inches)								
Kitchen, width of unobstructed space with countertop	28	parallel							

Numbers	Photos	Deficiency	Required Retrofit								
	 <p><i>Placement of tape at countertop.</i></p>  <p><i>Measurement of clear width at countertop.</i></p>										
15	 <p><i>Fire extinguisher cabinet at Leasing Office.</i></p>	<p>Fire extinguisher cabinet top operable parts are located above reach range (maximum 54 inches allowed).</p> <table border="1" data-bbox="730 964 1184 1143"> <thead> <tr> <th data-bbox="730 1003 848 1029"><u>Locations</u></th> <th data-bbox="1079 964 1184 1029"><u>Height (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="730 1039 911 1065">Leasing Office</td> <td data-bbox="1100 1039 1142 1065">62</td> </tr> <tr> <td data-bbox="730 1075 1058 1101">Building 2 west breezeway</td> <td data-bbox="1100 1075 1184 1101">62+/-</td> </tr> <tr> <td colspan="2" data-bbox="730 1110 1058 1143">(typical at all breezeways)</td> </tr> </tbody> </table>	<u>Locations</u>	<u>Height (inches)</u>	Leasing Office	62	Building 2 west breezeway	62+/-	(typical at all breezeways)		<p>Modify fire extinguisher cabinet to comply with ANSI 4.6.2.</p>
<u>Locations</u>	<u>Height (inches)</u>										
Leasing Office	62										
Building 2 west breezeway	62+/-										
(typical at all breezeways)											

Numbers	Photos	Deficiency	Required Retrofit						
	 <p data-bbox="268 597 667 672"><i>Typical height to top operable part.</i></p>								
Inaccessible Common Area Features									
16	 <p data-bbox="268 1133 487 1166">Vacuum station.</p>  <p data-bbox="268 1334 667 1409">Measurement of cross slope at vacuum station.</p>	<p data-bbox="726 782 1373 847">The common area clear floor space has a slope greater than 2% (maximum 2% allowed).</p> <table border="1" data-bbox="726 889 1209 997"> <thead> <tr> <th data-bbox="726 889 840 922"><u>Location</u></th> <th data-bbox="1100 889 1184 922"><u>Slope</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="726 928 1003 961">Grill east of Building 1</td> <td data-bbox="1138 928 1209 961">3.2%</td> </tr> <tr> <td data-bbox="726 967 919 997">Vacuum station</td> <td data-bbox="1125 967 1197 997">3.2%</td> </tr> </tbody> </table>	<u>Location</u>	<u>Slope</u>	Grill east of Building 1	3.2%	Vacuum station	3.2%	<p data-bbox="1415 782 1850 1036">Modify the cross slope of vacuum station (3.2%) to comply with ANSI 4.3.7. Modify the cross slope of the grill east of Building 1 (3.2%) to comply with ANSI 4.3.7, relocate the grill to a compliant location, or add a grill in a compliant location.</p>
<u>Location</u>	<u>Slope</u>								
Grill east of Building 1	3.2%								
Vacuum station	3.2%								

Numbers	Photos	Deficiency	Required Retrofit
17	 <p data-bbox="277 630 562 662"><i>Height of kitchen sink.</i></p>	<p data-bbox="730 256 1411 324">The rim of the kitchenette sink is 35-3/4 inches above the floor (maximum 34 inches allowed).</p>	<p data-bbox="1419 256 1848 324">Modify rim of sink to comply with ANSI 4.19.2.2.</p>
18	 <p data-bbox="277 1011 722 1081"><i>Kitchenette sink at the Community Room.</i></p>	<p data-bbox="730 669 1411 737">Sink at Community Room kitchenette lacks pipe protection (pipe protection required).</p>	<p data-bbox="1419 669 1848 737">Insulate pipes to comply with ANSI 4.19.4.</p>

Exhibit 3.3

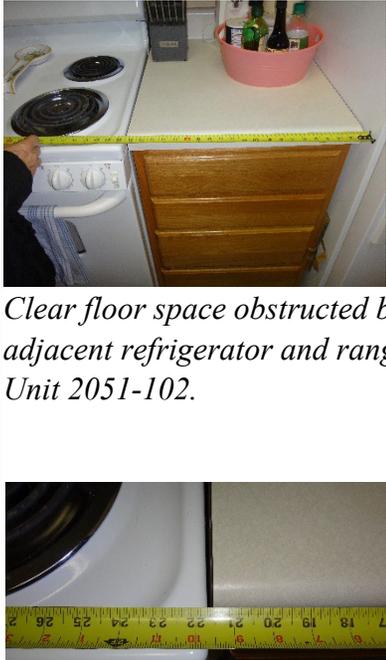
Hodges Creek Matrix of Required Retrofits to Covered Unit Interiors

HODGES CREEK APARTMENTS: COVERED UNIT INTERIORS

D. INACCESSIBLE FEATURES IN COVERED DWELLING UNITS Unit Types by Building:

Building	Unit Types								Totals	
	1st Floor (Covered Units)				2nd Floor		3rd Floor		Covered Units	Overall
No./ Addr.	2b1b	2b1b A	3b2b	3b2b A	2b1b	3b2b	2b1b	3b2b		
1 2020	0	0	2	0	-	-	-	-	2	2
2 2051	1	5	0	2	6	2	6	2	8	24
3 2010	1*	5	0	2*	6	2	6	2	8	24
Total	2	10	2	4	12	4	12	4	18	50

Numbers	Photos	Deficiency	Required Retrofit
19		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide affidavits to confirm that reinforcement is installed to comply with Requirement 6.
20		The shape of the bathtub surrounds precludes the installation of future grab bars with firm attachment to blocking (ability to install grab bars required).	Remediate upon resident request.
	<p><i>Bathtub/shower surround in Unit 2051-102.</i></p>		

Numbers	Photos	Deficiency	Required Retrofit
21	 <p data-bbox="277 634 730 743"><i>Clear floor space obstructed by adjacent refrigerator and range in Unit 2051-102.</i></p>	<p data-bbox="737 342 1339 521">The outlets above kitchen countertops in 2 areas (both sides of the range) lack the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).</p>	<p data-bbox="1346 342 1652 889">Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>

Numbers

Photos

Deficiency

Required Retrofit



Measurement of clear floor space width.



Range extension from countertop.



Clear floor space obstructed by range in Unit 2051-102.



Numbers	Photos	Deficiency	Required Retrofit
	 <p data-bbox="279 513 709 581"><i>Measurement of clear floor space width.</i></p>		
22	 <p data-bbox="279 1125 674 1239"><i>Placement of tape between refrigerator and dishwasher in Unit 2051-102.</i></p>	<p data-bbox="737 764 1339 870">The clearance between kitchen elements (face of refrigerator to face of dishwasher) is 38-3/4 inches (minimum 40 inches required).</p>	<p data-bbox="1346 764 1652 829">Remediate upon resident request.</p>

Numbers	Photos	Deficiency	Required Retrofit
	 <p data-bbox="275 688 569 716"><i>Measurement of clearance.</i></p>		
23	 <p data-bbox="275 1084 730 1200"><i>Dimension from side wall to centerline of lavatory in Unit 2051-102.</i></p>	The lavatory centerlines are 18-1/2 inches to the side wall (minimum 24 inches required) and the cabinets are not removable.	Install removable base cabinet to provide clear floor space to comply with Requirement 7(2)(a)(ii).

Numbers

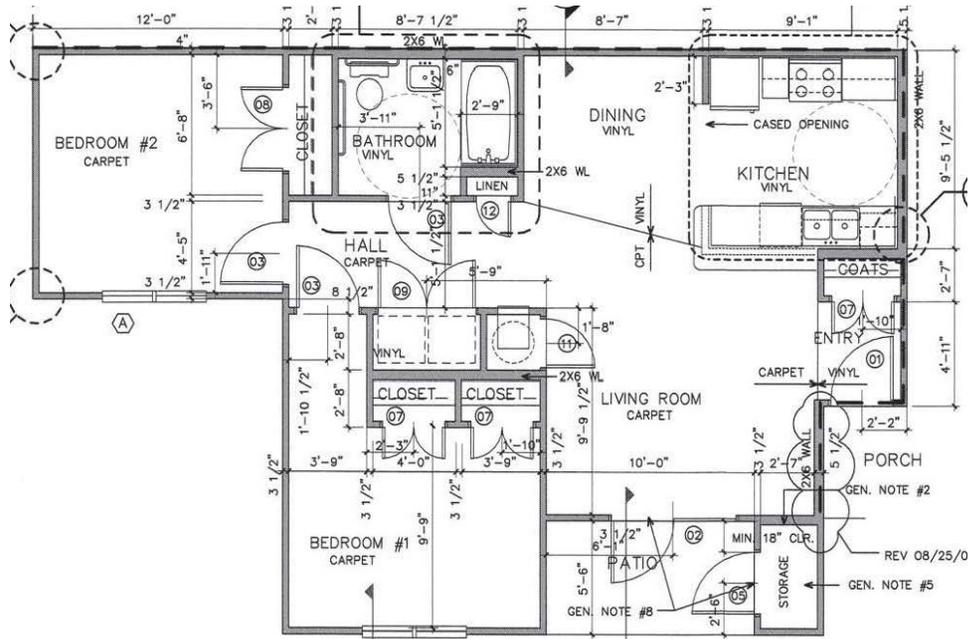
Photos

Deficiency

Required Retrofit

UNIT TYPE: 2 Bedroom, 1 Bathroom – (Type A)

Surveyed Unit 2010-104, Unit 2010-105, Unit 2010-106, and Unit 2051-103 – Typical for 10 total units
Unit Plan. (A03/02).



Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofit				
24		<p>Door thresholds are 5/8 inch high at the interior face and are not beveled (maximum 1/4 inch without bevel allowed).</p>	<p>Modify door thresholds to comply with Requirement 4(4).</p>				
25		<p>The thermostat top controls are more than 48 inches above the floor (maximum 48 inches allowed).</p> <table border="1" data-bbox="737 1008 1213 1114"> <thead> <tr> <th data-bbox="737 1049 842 1073"><u>Location</u></th> <th data-bbox="1094 1008 1213 1073"><u>Height (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="737 1081 905 1105">Unit 2010-105</td> <td data-bbox="1094 1081 1192 1105">50-1/8</td> </tr> </tbody> </table>	<u>Location</u>	<u>Height (inches)</u>	Unit 2010-105	50-1/8	<p>Accept proposed fix. Modify thermostat at 50 1/2" to comply with Requirement 5.</p>
<u>Location</u>	<u>Height (inches)</u>						
Unit 2010-105	50-1/8						
	<p><i>Thermostat in Unit 2010-105.</i></p>						

Numbers	Photos	Deficiency	Required Retrofit
26	 <p data-bbox="279 643 730 748"><i>Clear floor space obstructed by adjacent refrigerator and range in Unit 2010-104</i></p>  <p data-bbox="279 1000 730 1073"><i>Measurement of clear floor space width.</i></p>  <p data-bbox="279 1382 730 1414"><i>Projection of range beyond</i></p>	<p>The outlet above one area of kitchen countertop lacks the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach). Both the refrigerator and range are greater than 25 inches deep.</p>	<p>Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>

Numbers	Photos	Deficiency	Required Retrofit						
27	<p data-bbox="275 337 422 370"><i>countertop.</i></p>  <p data-bbox="275 695 688 727"><i>Pedestal sink in Unit 2010- 104.</i></p>  <p data-bbox="275 979 701 1089"><i>Measurement from bathtub to lavatory centerline in Unit 2010-104.</i></p>	<p data-bbox="737 399 1331 505">The lavatory centerlines are less than 24 inches to the side wall (minimum 24 inches required) and knee space is not provided.</p> <table data-bbox="737 548 1213 688"> <thead> <tr> <th data-bbox="737 581 842 613"><u>Location</u></th> <th data-bbox="1094 548 1213 613"><u>Distance (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="737 618 1031 651">Unit 2010-104 bathroom</td> <td data-bbox="1094 618 1188 651">19-1/2</td> </tr> <tr> <td data-bbox="737 656 1031 688">Unit 2051-103 bathroom</td> <td data-bbox="1094 656 1178 688">18 +/-</td> </tr> </tbody> </table>	<u>Location</u>	<u>Distance (inches)</u>	Unit 2010-104 bathroom	19-1/2	Unit 2051-103 bathroom	18 +/-	<p data-bbox="1346 399 1652 578">Install removable base cabinet to provide clear floor space to comply with Requirement 7(2)(a)(ii).</p>
<u>Location</u>	<u>Distance (inches)</u>								
Unit 2010-104 bathroom	19-1/2								
Unit 2051-103 bathroom	18 +/-								

Numbers

Photos

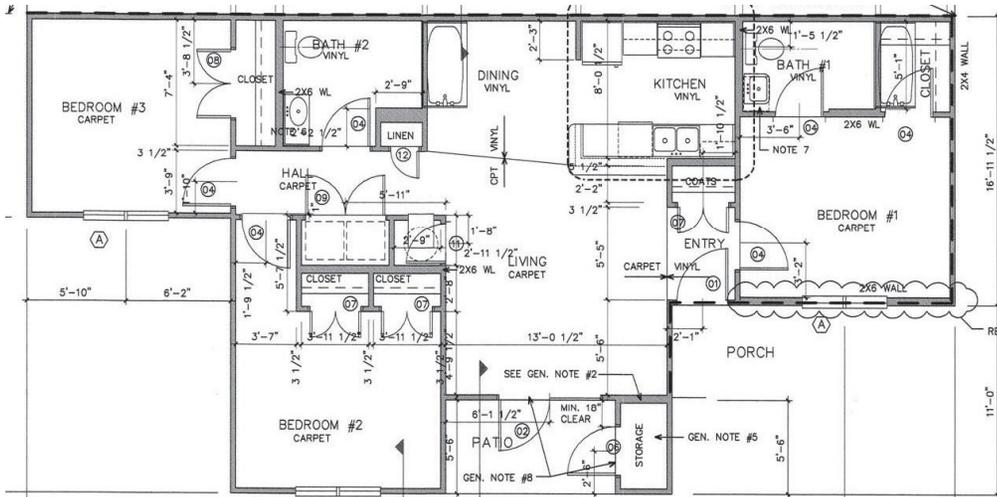
Deficiency

Required Retrofit

UNIT TYPE: 3 Bedroom, 2 Bathroom

Surveyed Unit 2020-101 – Typical for 3 total units

Unit Plan. (A03/03).



Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofit
28	 <p data-bbox="283 639 674 704"><i>Entrance door threshold interior side at Unit 2020- 101.</i></p>	Door thresholds are 1/2 inches high at the interior face and are not beveled (maximum 1/4 inch without bevel allowed).	Modify door thresholds to comply with Requirement 4(4).
29	 <p data-bbox="283 1149 674 1214"><i>Measurement of storage room threshold at Unit 2020- 101.</i></p>	Door thresholds are 3/4 inch high and are not beveled (maximum 1/4 inch without bevel allowed).	Modify door thresholds to comply with Requirement 4(4).

Numbers	Photos	Deficiency	Required Retrofit
30	 <p data-bbox="285 675 674 708"><i>Thermostat in Unit 2020-101.</i></p>	The thermostat top controls are 61 inches above the floor (maximum 48 inches allowed).	Modify thermostat to comply with Requirement 5.
31		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide affidavits to confirm that reinforcement is installed to comply with Requirement 6.

Numbers	Photos	Deficiency	Required Retrofit
32	 <p data-bbox="275 915 705 984"><i>Bathtub/shower surround in Unit 2020-101 hall bathroom.</i></p>	<p>The shape of the bathtub surrounds precludes the installation of future grab bars with firm attachment to blocking (ability to install grab bars required).</p>	<p>Remediate upon resident request.</p>
33	 <p data-bbox="275 1279 722 1390"><i>Clear floor space obstructed by adjacent refrigerator and range in Unit 2020-101.</i></p>	<p>The outlets above kitchen countertops in 2 areas (both sides of the range) lack the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).</p>	<p>Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5.</p>

Numbers

Photos

Deficiency

Required Retrofit



Measurement of clear floor space width.



Range extension from countertop.



Refrigerator depth.

Any such outlet must be approved by the United States prior to installation.

Numbers	Photos	Deficiency	Required Retrofit
	 <p data-bbox="281 602 684 678"><i>Clear floor space obstructed by range in Unit 2020-101.</i></p>  <p data-bbox="281 927 709 1003"><i>Measurement of clear floor space width.</i></p>		
34	 <p data-bbox="281 1354 667 1469"><i>Placement of tape between refrigerator and countertop in Unit 2020-101.</i></p>	The clearances between the refrigerator to the opposing countertop are 38-3/4 inches (minimum 40 inches required).	Remediate upon resident request.

Numbers	Photos	Deficiency	Required Retrofit
	 <p data-bbox="273 678 630 714"><i>Measurement of clearance.</i></p>		

Numbers	Photos	Deficiency	Required Retrofit
35	 <p data-bbox="275 643 680 708"><i>Lavatory in Unit 2020-101 hall bathroom.</i></p> <p data-bbox="275 1032 680 1097"><i>Measurement from side wall to lavatory centerline.</i></p>	<p data-bbox="737 342 1325 440">The lavatory centerlines are less than 24 inches to the side wall (minimum 24 inches required) and the cabinets are not removable.</p>	<p data-bbox="1346 342 1625 521">Install removable base cabinet to provide clear floor space to comply with Requirement 7(2)(a)(ii).</p>

Numbers

Photos

Deficiency

Required Retrofit



Interior of vanity.

Numbers

Photos

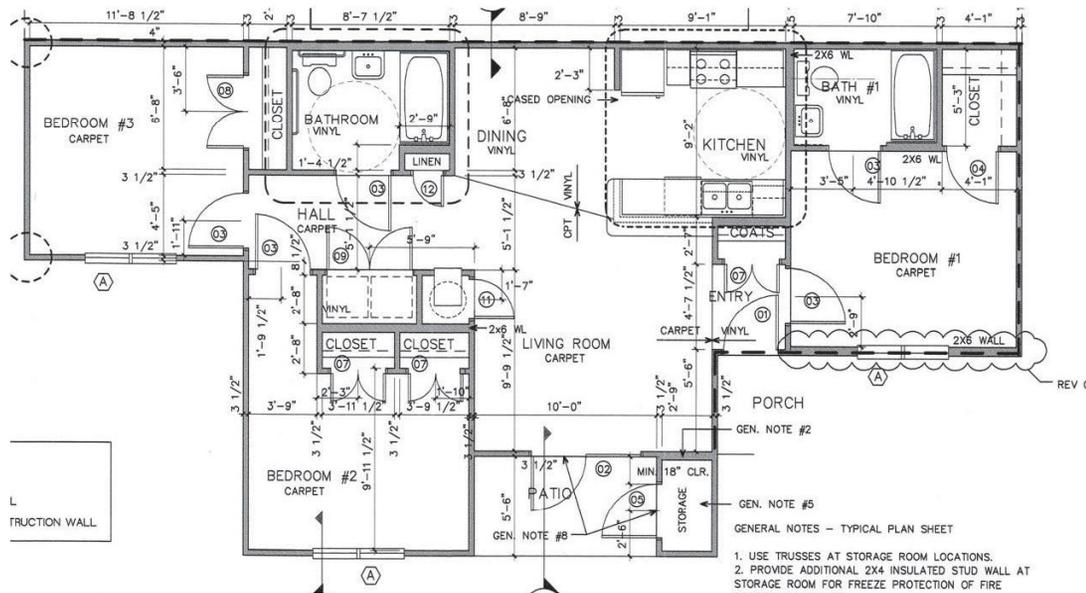
Deficiency

Required Retrofit

UNIT TYPE: 3 Bedroom, 2 Bathroom – (Type A)

Surveyed Unit 2010-101 and Unit 2051-108 – Typical for 3 total units

Unit Plan. (A03/04).



The master baths do not meet the provisions of Guidelines Requirement 7(2)(b) because of lack of forward or parallel approach to the lavatory. Both bathrooms in this unit type are evaluated under Guidelines Requirement 7(2)(a).

Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofit
36	 <p data-bbox="279 678 653 711"><i>Thermostat in Unit 2051-108</i></p>	The thermostat top controls are 48-7/8 inches above the floor (maximum 48 inches allowed).	Modify door thresholds to comply with Requirement 4(4).
36a.		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide affidavits to confirm that reinforcement is installed to comply with Requirement 6.

Numbers	Photos	Deficiency	Required Retrofit
37	 <p data-bbox="275 659 720 768"><i>Clear floor space obstructed by adjacent refrigerator and range in Unit 2010-101.</i></p>	<p>The outlets above kitchen countertops in 1 area lack the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).</p>	<p>Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
	 <p data-bbox="275 1122 720 1187"><i>Measurement of clear floor space width.</i></p>		

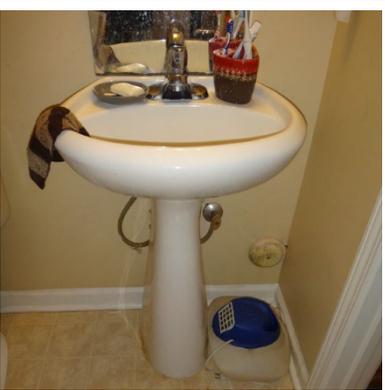
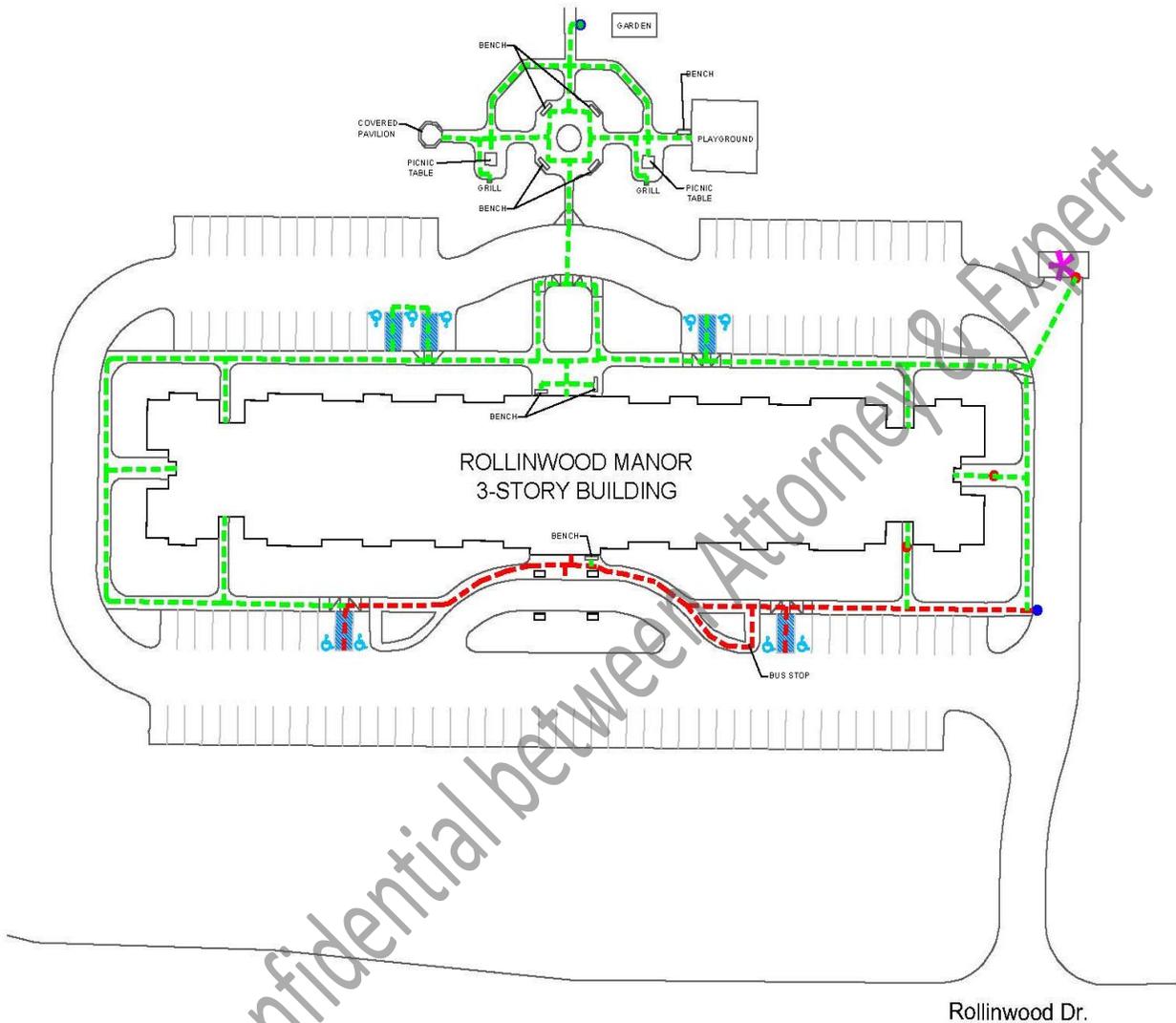
Numbers	Photos	Deficiency	Required Retrofit										
38	 <p data-bbox="275 792 684 862"><i>Pedestal sink in Unit 2010- 101 master bathroom.</i></p>	<p data-bbox="737 342 1325 448">The lavatory centerlines are less than 24 inches to the side wall (minimum 24 inches required) and knee space is not provided.</p> <table data-bbox="737 488 1213 708"> <thead> <tr> <th data-bbox="737 529 842 553"><u>Location</u></th> <th data-bbox="1104 488 1213 553"><u>Distance (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="737 561 1020 586">Unit 2010-101 hall bath</td> <td data-bbox="1129 561 1167 586">21</td> </tr> <tr> <td data-bbox="737 594 1052 618">Unit 2010-101 master bath</td> <td data-bbox="1129 594 1209 618">15-5/8</td> </tr> <tr> <td data-bbox="737 626 1020 651">Unit 2051-108 hall bath</td> <td data-bbox="1129 626 1209 651">19-1/2</td> </tr> <tr> <td data-bbox="737 659 1052 683">Unit 2051-108 master bath</td> <td data-bbox="1129 659 1209 683">15-5/8</td> </tr> </tbody> </table>	<u>Location</u>	<u>Distance (inches)</u>	Unit 2010-101 hall bath	21	Unit 2010-101 master bath	15-5/8	Unit 2051-108 hall bath	19-1/2	Unit 2051-108 master bath	15-5/8	<p data-bbox="1346 342 1625 480">Modify sink to provide clear floor space to comply with Requirement 7(2)(a)(ii).</p>
<u>Location</u>	<u>Distance (inches)</u>												
Unit 2010-101 hall bath	21												
Unit 2010-101 master bath	15-5/8												
Unit 2051-108 hall bath	19-1/2												
Unit 2051-108 master bath	15-5/8												
	 <p data-bbox="275 1195 726 1308"><i>Measurement from side wall to centerline of lavatory in Unit 2010-101 master bathroom.</i></p>												

EXHIBIT 4.1

Rollinwood Manor Accessible Route



NORTH
 **LEGEND**

 EXTERIOR COMMON AREA AMENITY

 TRASH

 AISLE @ PARKING

 DESIGNATED PARKING SPACE

 COMMON ROUTES

 PUBLIC ROUTES

 LEVEL CHANGE

 ROUTE ENDS AT VEHICULAR WAY

 ROUTE ENDS AT GRASS

Exhibit 4.2

Rollinwood Manor Matrix of Required Retrofits to Public and Common Use Areas

ROLLINWOOD MANOR APARTMENTS: PUBLIC AND COMMON USE AREAS

A. Public and Common Areas

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
1	 <p><i>Route along drive lane.</i></p>	There is no accessible route between pedestrian site arrival points and leasing office.	Install accessible sidewalk to Rollinwood Drive to the South.
Inaccessible Parking Features			
2	 <p><i>Parking aisle location.</i></p>	Designated parking access aisle at leasing has a running slope greater than 2.0% (maximum 2% allowed).	Modify 3.9% running slope to comply with ADA 4.6.2.

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit								
	 <p><i>Running slope measurement.</i></p>										
	Inaccessible Slopes										
3	 <p><i>Route at Location.</i></p>  <p><i>Cross slope.</i></p>	<p>Cross slopes of the route are more than 2% (maximum 2% allowed).</p> <table border="1" data-bbox="800 651 1411 927"> <thead> <tr> <th data-bbox="800 651 1199 683">Location</th> <th data-bbox="1203 651 1411 683">Slope</th> </tr> </thead> <tbody> <tr> <td data-bbox="800 686 1199 764">South of Building (southwest of public entrance)</td> <td data-bbox="1203 686 1411 764">3.8%</td> </tr> <tr> <td data-bbox="800 768 1199 846">South of Building (southeast of public entrance)</td> <td data-bbox="1203 768 1411 846">4.3%</td> </tr> <tr> <td data-bbox="800 849 1199 927">South of Building (southeast of public entrance)</td> <td data-bbox="1203 849 1411 927">3.8%</td> </tr> </tbody> </table>	Location	Slope	South of Building (southwest of public entrance)	3.8%	South of Building (southeast of public entrance)	4.3%	South of Building (southeast of public entrance)	3.8%	<p>Modify 3.8%, 4.3%, and 3.8% cross slopes to comply with ANSI 4.3.7.</p>
Location	Slope										
South of Building (southwest of public entrance)	3.8%										
South of Building (southeast of public entrance)	4.3%										
South of Building (southeast of public entrance)	3.8%										
	Inaccessible Curb Ramp Features										

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit				
4	 <p><i>Curb ramp south of Building.</i></p>  <p><i>Running slope at curb ramp.</i></p>	<p>The running slope of the ramp leading to the leasing office is more than 8.3% (maximum 8.3% allowed).</p> <table border="0"> <tr> <td><u>Location</u></td> <td><u>Slopes</u></td> </tr> <tr> <td>South of Building (southwest of public entrance)</td> <td>9.2%</td> </tr> </table>	<u>Location</u>	<u>Slopes</u>	South of Building (southwest of public entrance)	9.2%	<p>Modify 9.2% running slopes of curb ramp to comply with ANSI 4.7.2.</p>
<u>Location</u>	<u>Slopes</u>						
South of Building (southwest of public entrance)	9.2%						
Inaccessible Door Features							

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit										
5	 <p data-bbox="317 651 772 683"><i>Hardware at unisex restroom door.</i></p>	<p data-bbox="795 215 1415 370">The unisex restroom (closest to the management offices) door has hardware which requires tight grasping, pinching, or twisting of the wrist (not allowed).</p>	<p data-bbox="1419 215 1631 313">Replace door hardware to comply with ANSI 4.13.9.</p>										
Protruding Objects													
6	 <p data-bbox="317 1192 743 1224"><i>AED box in First Floor corridor.</i></p>	<p data-bbox="795 760 1415 873">The objects protrude more than 4 inches into the circulation path (maximum 4 inches allowed).</p> <p data-bbox="795 881 932 914">Protrusion</p> <table data-bbox="795 922 1314 1157"> <thead> <tr> <th data-bbox="795 922 1199 954"><u>Location</u></th> <th data-bbox="1203 922 1314 954"><u>(inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="795 963 1167 995">Corridor 1st Floor AED Box</td> <td data-bbox="1220 963 1255 995">7</td> </tr> <tr> <td data-bbox="795 1003 1104 1036">Height of leading edge</td> <td data-bbox="1220 1003 1308 1036">57-1/8</td> </tr> <tr> <td data-bbox="795 1084 1157 1117">1st Floor Drinking Fountain</td> <td data-bbox="1220 1084 1276 1117">19</td> </tr> <tr> <td data-bbox="795 1125 1115 1157">Height of leading edge</td> <td data-bbox="1203 1125 1304 1157">32-1/4</td> </tr> </tbody> </table>	<u>Location</u>	<u>(inches)</u>	Corridor 1st Floor AED Box	7	Height of leading edge	57-1/8	1st Floor Drinking Fountain	19	Height of leading edge	32-1/4	<p data-bbox="1419 760 1631 954">Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>
<u>Location</u>	<u>(inches)</u>												
Corridor 1st Floor AED Box	7												
Height of leading edge	57-1/8												
1st Floor Drinking Fountain	19												
Height of leading edge	32-1/4												

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p><i>AED box height.</i></p>  <p><i>AED box depth.</i></p>		
	<p>Inaccessible Unisex Public Restroom Features</p> <p>(Note: all notes in this section apply to the restroom closest to the management offices.)</p>		
7	 <p><i>Toilet in unisex restroom</i></p>	<p>The leading edge of the toilet paper dispenser is 39-1/2 inches from the rear wall (maximum 36 inches allowed).</p>	<p>Modify toilet paper dispenser to comply with ANSI 4.16.6.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="317 496 762 570"><i>Dimension from rear wall to toilet paper dispenser.</i></p>		
8	 <p data-bbox="317 846 663 873"><i>Toilet in public unisex restroom.</i></p> <p data-bbox="317 1174 762 1234"><i>Width from side wall to lavatory in public unisex restroom.</i></p>	<p data-bbox="795 578 1339 691">The toilet clearance is 42 inches wide (minimum 48 inch width by 66 inch depth required).</p>	<p data-bbox="1419 578 1635 670">Modify toilet clearance to comply with ANSI 4.16.2.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="317 459 768 532"><i>Width from side wall to lavatory in public unisex restroom.</i></p>		
9	 <p data-bbox="317 833 688 865"><i>Grab bar in unisex restroom.</i></p>  <p data-bbox="317 1157 741 1230"><i>Dimension of side grab bar from rear wall</i></p>	The side wall grab bar starts 13-7/8 inches from the rear wall (maximum 12 inches allowed).	Relocate grab bar to comply with ANSI 4.17.6.
Additional Information Based on ADAAG			

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
10	 <p data-bbox="317 678 621 711"><i>Parking space location.</i></p>  <p data-bbox="317 1003 730 1036"><i>Running slope at parking space.</i></p>	Designated parking space has a running slope of 3.8% (maximum 2% allowed).	Modify running slope of 3.8% to comply with ADA 4.6.2.

B. Routes to Dwelling Units from Site Arrival Points and to Common Areas from Dwelling Units

	Lack of Accessible Route
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Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
11	 <p data-bbox="317 597 569 630"><i>No route to garden.</i></p>	There is no accessible route to the garden area.	Modify to comply with Requirement 2.
Inaccessible Changes in Level			
12	 <p data-bbox="317 1175 737 1208"><i>Change in level at east entrance.</i></p>	Outside the east entry, at the edge of the stoop, there a change in level that is 3/4 inches high and is not beveled (maximum 1/4 inch allowed without bevel).	Modify level change to comply with ANSI 4.5.2.
Inaccessible Slopes			

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit														
13	 <p data-bbox="317 639 699 711"><i>Northwest of building at west driveway.</i></p>  <p data-bbox="317 959 472 992"><i>Cross slope</i></p>	<p data-bbox="795 215 1314 293">Cross slopes of routes are more than 2% (maximum 2% allowed).</p> <table border="1" data-bbox="795 337 1289 613"> <thead> <tr> <th data-bbox="795 337 1199 370">Location</th> <th data-bbox="1203 337 1289 370">Slope</th> </tr> </thead> <tbody> <tr> <td data-bbox="795 378 1087 410">Northwest of Building</td> <td data-bbox="1203 378 1289 410">3.9%</td> </tr> <tr> <td data-bbox="795 418 1087 451">Northwest of Building</td> <td data-bbox="1203 418 1289 451">3.3%</td> </tr> <tr> <td data-bbox="795 459 1087 492">Northwest of Building</td> <td data-bbox="1203 459 1289 492">3.5%</td> </tr> <tr> <td data-bbox="795 500 1087 532">Northwest of Building</td> <td data-bbox="1203 500 1289 532">3.9%</td> </tr> <tr> <td data-bbox="795 540 1087 573">Northwest of Building</td> <td data-bbox="1203 540 1289 573">3.4%</td> </tr> <tr> <td data-bbox="795 581 1087 613">Northeast of Building</td> <td data-bbox="1203 581 1289 613">3.4%</td> </tr> </tbody> </table> <p data-bbox="795 662 1377 813">A maximum 2% cross slope is allowed at an accessible route. (Guidelines Requirement 1; Guidelines Requirement 2 Chart; ANSI 1986 4.3.7).</p>	Location	Slope	Northwest of Building	3.9%	Northwest of Building	3.3%	Northwest of Building	3.5%	Northwest of Building	3.9%	Northwest of Building	3.4%	Northeast of Building	3.4%	<p data-bbox="1419 215 1625 378">Modify 3.3%, 3.9%, 3.5%, 3.9%, 3.4%, 3.4% cross slopes to comply with ANSI 4.3.7.</p>
Location	Slope																
Northwest of Building	3.9%																
Northwest of Building	3.3%																
Northwest of Building	3.5%																
Northwest of Building	3.9%																
Northwest of Building	3.4%																
Northeast of Building	3.4%																

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit										
14	 <p><i>Curb ramp measurement location.</i></p>  <p><i>Running slope</i></p>	<p>Running slope of the curb ramp north of the building is 10.1% (maximum 8.3% allowed).</p>	<p>Modify curb ramp to comply with ANSI 4.7.2.</p>										
15	 <p><i>North entrance door.</i></p>	<p>Common door maneuvering clearances are sloped greater than 2.0% (maximum 2% allowed).</p> <table border="1" data-bbox="795 1036 1285 1230"> <thead> <tr> <th><u>Location</u></th> <th><u>Slope</u></th> </tr> </thead> <tbody> <tr> <td>Southwest Entrance Door</td> <td>6.7%</td> </tr> <tr> <td>Northwest Entrance Door</td> <td>5.4%</td> </tr> <tr> <td>North Entrance Door</td> <td>9.4%</td> </tr> <tr> <td>Northeast Entrance Door</td> <td>6.4%</td> </tr> </tbody> </table>	<u>Location</u>	<u>Slope</u>	Southwest Entrance Door	6.7%	Northwest Entrance Door	5.4%	North Entrance Door	9.4%	Northeast Entrance Door	6.4%	<p>Modify cross slopes to comply with ANSI 4.13.6</p>
<u>Location</u>	<u>Slope</u>												
Southwest Entrance Door	6.7%												
Northwest Entrance Door	5.4%												
North Entrance Door	9.4%												
Northeast Entrance Door	6.4%												

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="317 418 743 493"><i>Slope at north door maneuvering space.</i></p>		
	Inaccessible Door Hardware		
16	 <p data-bbox="317 979 779 1013"><i>Hardware at community room door.</i></p>	<p data-bbox="795 630 1402 740">The doors have hardware which requires tight grasping, pinching, or twisting of the wrist (not allowed) to operate either the latch or the lock.</p> <p data-bbox="795 789 1402 862">This is a typical hardware feature throughout building common areas (not an exhaustive list).</p> <p data-bbox="795 911 1213 1060"><u>Location</u> Third Floor Community Room Third Floor Library First Floor Unisex Restroom 2</p>	<p data-bbox="1421 630 1619 721">Replace hardware to comply with 4.13.9.</p>
	Protruding Objects		

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
17	 <p data-bbox="317 529 722 602"><i>Drinking fountain in third floor corridor.</i></p>  <p data-bbox="317 1052 611 1084"><i>Height of bottom edge.</i></p>	<p data-bbox="795 220 1388 329">Drinking fountain protrudes approximately 19 inches into the circulation path (maximum 4 inches allowed).</p> <p data-bbox="795 383 911 410"><u>Location</u></p> <p data-bbox="795 418 1087 446">Second Floor Corridor</p> <p data-bbox="835 459 1304 487">Height of leading edge 32-3/8</p> <p data-bbox="795 500 1066 527">Third Floor Corridor</p> <p data-bbox="835 540 1304 568">Height of leading edge 32-3/4</p>	<p data-bbox="1419 220 1633 410">Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="317 781 642 820"><i>Projection from the wall.</i></p>		

C. Common Use Areas

	Inaccessible Common Area Features

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
18	 <p><i>Grill at common area</i></p>  <p><i>Cross slope at grill.</i></p>	Clear floor space at the grill northeast of the building slopes 3.5% (maximum 2% allowed).	Modify 3.5% slope to comply with ANSI 4.3.7.
19	 <p><i>Knee space at work surface in Laundry Room</i></p>	The clear width of the knee space at the laundry work surface is 28-5/8 inches (minimum 30 inches clear width required).	Modify knee space to comply with ANSI 4.30.3.

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="317 537 583 574"><i>Width of knee space.</i></p>		
20	 <p data-bbox="317 971 659 1008"><i>Laundry room work space</i></p>  <p data-bbox="317 1328 520 1365"><i>Counter height.</i></p>	Countertop at laundry work surface is 36-1/4 inches above the floor (maximum 34 inches allowed).	Modify countertop to comply with ANSI 4.30.4

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit										
21	 <p><i>Maneuvering clearance at third floor unisex restroom door.</i></p>  <p><i>Maneuvering clearance at unisex restroom door.</i></p>	<p>Door maneuvering clearances are less than 18 inches (minimum 18 inches required).</p> <table border="1" data-bbox="795 337 1415 735"> <thead> <tr> <th data-bbox="795 378 1178 410">Location</th> <th data-bbox="1182 337 1415 410">Clearance (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="795 414 1178 492">Unisex Restroom 3 (Second Floor)</td> <td data-bbox="1182 414 1415 446">13</td> </tr> <tr> <td data-bbox="795 495 1178 573">Unisex Restroom 4 (Second Floor)</td> <td data-bbox="1182 495 1415 527">12-1/2</td> </tr> <tr> <td data-bbox="795 576 1178 654">Unisex Restroom 5 (Third Floor)</td> <td data-bbox="1182 576 1415 609">11-1/2</td> </tr> <tr> <td data-bbox="795 657 1178 735">Unisex Restroom 6 (Third Floor)</td> <td data-bbox="1182 657 1415 690">13-7/8</td> </tr> </tbody> </table>	Location	Clearance (inches)	Unisex Restroom 3 (Second Floor)	13	Unisex Restroom 4 (Second Floor)	12-1/2	Unisex Restroom 5 (Third Floor)	11-1/2	Unisex Restroom 6 (Third Floor)	13-7/8	<p>Remediate first floor public restrooms and one common restroom on the second and third floors.</p> <p>Modify by installing smaller sink or relocate sink to provide 18" minimum clearance to comply with ANSI 4.13.6.</p>
Location	Clearance (inches)												
Unisex Restroom 3 (Second Floor)	13												
Unisex Restroom 4 (Second Floor)	12-1/2												
Unisex Restroom 5 (Third Floor)	11-1/2												
Unisex Restroom 6 (Third Floor)	13-7/8												
	Inaccessible Common Restroom Features												

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
22	 <p data-bbox="317 570 592 605"><i>Single user restroom.</i></p>  <p data-bbox="317 889 569 925"><i>Centerline of toilet.</i></p>	<p data-bbox="795 215 1373 332">The toilet centerline at one third floor single user restroom is 19 inches from the side wall (maximum 18 inches allowed).</p>	<p data-bbox="1419 215 1625 381">Modify toilet by installing offset toilet flange to comply with ANSI 4.16.2.</p>
23	 <p data-bbox="317 1336 592 1372"><i>Single user restroom.</i></p>	<p data-bbox="795 958 1400 1117">The rear wall grab bars extends 20 inches from the toilet centerline (minimum 24 inches required). The extension from the sidewall is 37-1/2 inches (minimum 42 inches required).</p>	<p data-bbox="1419 958 1614 1058">Relocate grab bar to comply with ANSI 4.17.6.</p>

Numbers	Lack of Accessible Route	Deficiency	Required Retrofit
	 <p data-bbox="317 643 764 675"><i>Grab bar extension from side wall.</i></p>		

Exhibit 4.3

Rollinwood Manor Matrix of Required Retrofits to Covered Unit Interiors

Numbers	Photos	Deficiency	Required Retrofit
24	 <p data-bbox="300 605 611 636"><i>Thermostat in Unit 167.</i></p>	Thermostat top controls are 57 inches above the floor (maximum 48 inches allowed).	Modify thermostat to comply with Requirement 5.

Numbers	Photos	Deficiency	Required Retrofit
25	 <p data-bbox="300 626 709 699"><i>Clear floor space obstructed by adjacent range. Unit 167.</i></p>  <p data-bbox="300 1187 730 1260"><i>Range extension from countertop. Unit 167.</i></p>	<p data-bbox="783 224 1398 496">The outlet above the kitchen counter between the stove and the sidewall lacks the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach). The range is approximately 26-1/2 inches depth (maximum depth obstruction is 25-1/2 inches).</p>	<p data-bbox="1409 224 1690 691">Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>

Numbers	Photos	Deficiency	Required Retrofit
27	 <p data-bbox="304 576 609 609"><i>Thermostat in Unit 254.</i></p>	Thermostat top controls are 58-5/8 inches above the floor (maximum 48 inches allowed).	Modify thermostat to comply with Requirement 5.

Numbers	Photos	Deficiency	Required Retrofit
28	 <p data-bbox="300 553 709 630"><i>Clear floor space obstructed by adjacent range.</i></p>  <p data-bbox="300 1040 737 1117"><i>Range extension from countertop. Unit 102 – Building 3</i></p>	<p data-bbox="783 224 1392 500">The outlet above the kitchen countertop between the stove and the side wall lacks the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach). The range is approximately 26-1/2 inches depth (maximum depth obstruction is 25-1/2 inches).</p> <p data-bbox="783 540 1203 581">This occurs in all units surveyed.</p>	<p data-bbox="1409 224 1682 719">Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
29		<p data-bbox="783 1170 1329 1247">Extent of blocking in bathrooms cannot be determined without destructive testing.</p>	<p data-bbox="1409 1170 1675 1336">Provide affidavits to confirm that reinforcement is installed to comply with Requirement 6.</p>

Numbers	Photos	Deficiency	Required Retrofit
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UNIT TYPE: 2 Bedroom, 1 Bathroom – (Accessible)
 Surveyed Unit 178, Unit 225, and Unit 325 – Typical for 4 total units

Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofit
30	 <p data-bbox="302 581 611 613"><i>Thermostat in Unit 225.</i></p>	<p data-bbox="783 224 1392 297">Thermostat top controls are 48-3/4 inches above the floor (maximum 48 inches allowed).</p> <p data-bbox="783 383 1297 456">(Guidelines, Requirement 5; ANSI 1986 4.25.3; ANSI 1986 Figure 5(a)).</p>	<p data-bbox="1409 224 1680 313">Modify thermostat to comply with Requirement 5.</p>

EXHIBIT 5.1

Kittrell Place Accessible Route

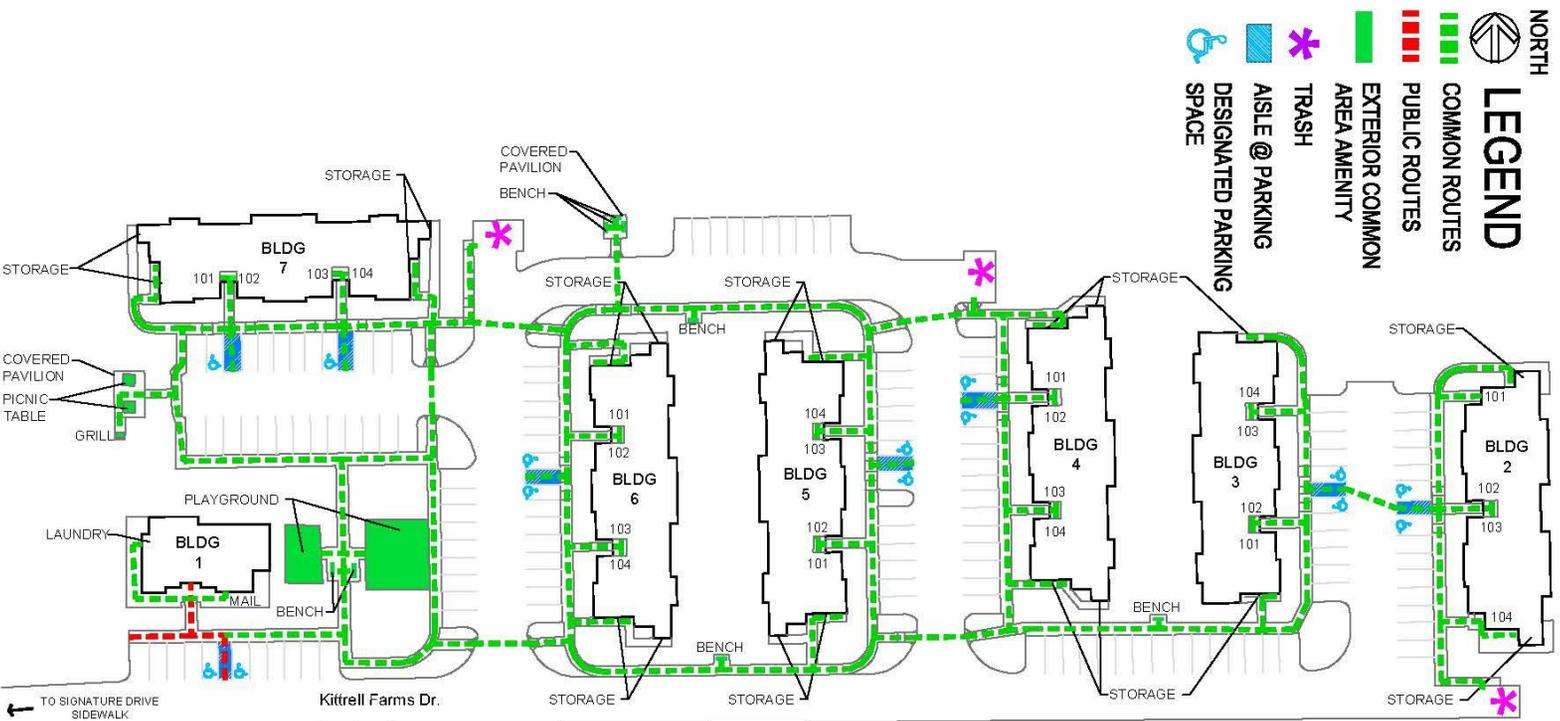


Exhibit 5.2

Kittrell Place Matrix of Required Retrofits to Public and Common Use Areas

KITTRELL PLACE APARTMENTS: PUBLIC AND COMMON USE AREAS

A. INACCESSIBLE FEATURES AT PUBLIC AND COMMON AREAS:

Lack of Accessible Route	Deficiency	Required Retrofit						
<p>1</p>  <p><i>Route along drive lane.</i></p>	<p>There is no accessible route between pedestrian site arrival points and the leasing office. There is no sidewalk to or across the adjacent property to the west.</p>	<p>Provide an accessible route to the property line to comply with Requirement 2.</p>						
Inaccessible Door Threshold	Deficiency	Required Retrofit						
<p>2</p>  <p><i>Women's restroom door threshold.</i></p>	<p>The restroom door interior and exterior threshold heights are greater than 1/4 inch and are not beveled (maximum 1/4 inch vertical allowed, 1/2 inch threshold height with bevel is allowed).</p> <table data-bbox="529 857 911 974"> <thead> <tr> <th data-bbox="529 889 722 912"><u>Location</u></th> <th data-bbox="823 857 911 912"><u>Height (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="529 919 722 941">Women's Restroom</td> <td data-bbox="848 919 886 941">3/4</td> </tr> <tr> <td data-bbox="529 948 722 971">Men's Restroom</td> <td data-bbox="848 948 886 971">3/4</td> </tr> </tbody> </table>	<u>Location</u>	<u>Height (inches)</u>	Women's Restroom	3/4	Men's Restroom	3/4	<p>Modify threshold to comply with ANSI 4.13.8.</p>
<u>Location</u>	<u>Height (inches)</u>							
Women's Restroom	3/4							
Men's Restroom	3/4							

Protruding Objects	Deficiency	Required Retrofit
<p data-bbox="134 196 163 219">3</p>  <p data-bbox="205 367 487 389"><i>Drinking fountain at leasing office.</i></p>  <p data-bbox="205 686 348 709"><i>Protruding height.</i></p>  <p data-bbox="205 930 342 953"><i>Protruding depth.</i></p>	<p data-bbox="529 196 1108 280">The standing-height drinking fountain protrudes 19 inches into the circulation path at a height of 32 inches above the floor (maximum 4 inches allowed).</p>	<p data-bbox="1108 196 1388 251">Modify drinking fountain to comply with ANSI 4.15.5.</p>

B. INACCESSIBLE FEATURES AT COMMON AREA ROUTES

Lack of Accessible Route	Deficiency	Required Retrofit
<p>4</p>  <p><i>Route along drive lane.</i></p>  <p><i>Opposite side of drive lane.</i></p>	<p>There is no accessible route to dwelling unit entries and common areas from site arrival points (accessible route required).</p>	<p>Provide an accessible route to the property line to comply with Requirement 1 and 2.</p>
Inaccessible Gaps	Deficiency	Required Retrofit
<p>5</p>  <p><i>Southwest corner of Building 7.</i></p>  <p><i>Measurement of gap width.</i></p>	<p>Gaps in the pavement are 1 inch wide (maximum 1/2 inch allowed).</p>	<p>Modify gap to comply with ANSI 4.5.</p>

Inaccessible Slopes	Deficiency	Required Retrofit										
<p>6</p>  <p><i>West of west entry to Building 7.</i></p>  <p><i>Measurement of cross slope.</i></p>	<p>The cross slopes of the route are more than 2% (maximum 2% allowed).</p> <table border="0"> <tr> <td>Location</td> <td>Slope</td> </tr> <tr> <td colspan="2">South of Building 7 west entry:</td> </tr> <tr> <td>1st slab west of curb ramp</td> <td>3.2%</td> </tr> <tr> <td>2nd slab west of curb ramp</td> <td>3.9%</td> </tr> <tr> <td>3rd slab west of curb ramp</td> <td>3.4%</td> </tr> </table>	Location	Slope	South of Building 7 west entry:		1st slab west of curb ramp	3.2%	2nd slab west of curb ramp	3.9%	3rd slab west of curb ramp	3.4%	<p>Modify 3.2%, 3.9%, and 3.4% cross slopes in walkways to comply with ANSI 4.3.7.</p>
Location	Slope											
South of Building 7 west entry:												
1st slab west of curb ramp	3.2%											
2nd slab west of curb ramp	3.9%											
3rd slab west of curb ramp	3.4%											
<p>7</p>  <p><i>Walk to Building 5 north storage units</i></p>  <p><i>Measurement of running slope.</i></p>	<p>The running slopes of routes are greater than 8.3% (maximum 8.3% allowed) and the rise is greater than 6 inches. Route leads to storage units S08-12. Method of assigning storage units is not known.</p> <table border="0"> <tr> <td><u>Location</u></td> <td><u>Slope</u></td> </tr> <tr> <td colspan="2">Walk to Building 5 north storage units:</td> </tr> <tr> <td>1st slab</td> <td>13.3%</td> </tr> <tr> <td>2nd slab</td> <td>13.4%</td> </tr> </table>	<u>Location</u>	<u>Slope</u>	Walk to Building 5 north storage units:		1st slab	13.3%	2nd slab	13.4%	<p>Ensure that storage rooms for the first floor residents are located on the accessible route on the opposite side of the building.</p>		
<u>Location</u>	<u>Slope</u>											
Walk to Building 5 north storage units:												
1st slab	13.3%											
2nd slab	13.4%											

Inaccessible Slopes	Deficiency	Required Retrofit								
<p>8</p>  <p><i>West entry to Building 7.</i></p>  <p><i>Measurement of cross slope.</i></p>	<p>The cross slope of the curb ramp is more than 2.0% (maximum 2.0% allowed).</p>	<p>Modify 3.7% cross slope to comply with ANSI 4.7.2.</p>								
<p>9</p>  <p><i>Curb ramp at Building 7 west entry.</i></p>  <p><i>Measurement of running slope at middle of ramp</i></p>  <p><i>Measurement of running slope at top of ramp.</i></p>	<p>The running slope of the curb ramp is more than 8.3% (maximum 8.3% allowed).</p> <table border="0"> <thead> <tr> <th><u>Location</u></th> <th><u>Slope</u></th> </tr> </thead> <tbody> <tr> <td colspan="2">Building 7 west entry, east curb ramp:</td> </tr> <tr> <td>Middle of ramp</td> <td>9.0%</td> </tr> <tr> <td>Top of ramp</td> <td>9.2%</td> </tr> </tbody> </table>	<u>Location</u>	<u>Slope</u>	Building 7 west entry, east curb ramp:		Middle of ramp	9.0%	Top of ramp	9.2%	<p>Modify curb ramp to comply with 4.7.2.</p>
<u>Location</u>	<u>Slope</u>									
Building 7 west entry, east curb ramp:										
Middle of ramp	9.0%									
Top of ramp	9.2%									

Inaccessible Door Threshold	Deficiency	Required Retrofit																				
<p>10</p>  <p><i>Unit 4141-104 entrance door.</i></p>	<p>Entrance door thresholds are more than 1/4 inches high and are not beveled (maximum 1/4-inch height allowed without bevel).</p> <table border="0"> <thead> <tr> <th data-bbox="529 305 793 329">Location</th> <th data-bbox="793 305 949 329">Height (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="529 337 772 362">Unit 4141-103 (Bldg. 2)</td> <td data-bbox="823 337 865 362">1/2</td> </tr> <tr> <td data-bbox="529 370 772 394">Unit 4141-104 (Bldg. 2)</td> <td data-bbox="823 370 865 394">3/4</td> </tr> <tr> <td data-bbox="529 402 772 427">Unit 4133-103 (Bldg. 4)</td> <td data-bbox="823 402 865 427">1/2</td> </tr> <tr> <td data-bbox="529 435 772 459">Unit 4133-104 (Bldg. 4)</td> <td data-bbox="823 435 865 459">1/2</td> </tr> <tr> <td data-bbox="529 467 772 492">Unit 4129-101 (Bldg. 5)</td> <td data-bbox="823 467 865 492">1/2</td> </tr> <tr> <td data-bbox="529 500 772 524">Unit 4129-103 (Bldg. 5)</td> <td data-bbox="823 500 865 524">1/2</td> </tr> <tr> <td colspan="2" data-bbox="529 532 772 557">Building 7 storage S06:</td> </tr> <tr> <td data-bbox="529 565 646 589">Exterior</td> <td data-bbox="823 565 865 589">5/8</td> </tr> <tr> <td data-bbox="529 597 646 621">Interior</td> <td data-bbox="823 597 865 621">1-1/2</td> </tr> </tbody> </table>	Location	Height (inches)	Unit 4141-103 (Bldg. 2)	1/2	Unit 4141-104 (Bldg. 2)	3/4	Unit 4133-103 (Bldg. 4)	1/2	Unit 4133-104 (Bldg. 4)	1/2	Unit 4129-101 (Bldg. 5)	1/2	Unit 4129-103 (Bldg. 5)	1/2	Building 7 storage S06:		Exterior	5/8	Interior	1-1/2	<p>Modify thresholds that are more than 3/8 inches high to comply with Requirement 4(4).</p>
Location	Height (inches)																					
Unit 4141-103 (Bldg. 2)	1/2																					
Unit 4141-104 (Bldg. 2)	3/4																					
Unit 4133-103 (Bldg. 4)	1/2																					
Unit 4133-104 (Bldg. 4)	1/2																					
Unit 4129-101 (Bldg. 5)	1/2																					
Unit 4129-103 (Bldg. 5)	1/2																					
Building 7 storage S06:																						
Exterior	5/8																					
Interior	1-1/2																					

Protruding Objects	Deficiency	Required Retrofit
<p data-bbox="134 196 163 219">11</p>  <p data-bbox="201 488 491 537"><i>Light fixture at Unit 101 - Building 7 breezeway.</i></p>  <p data-bbox="201 708 348 732"><i>Protruding height.</i></p>  <p data-bbox="201 930 342 954"><i>Protruding depth.</i></p>	<p data-bbox="529 196 1108 337">The lights at unit entries project approximately 7 inches into the circulation path at a height of 77 inches and the rent drop box projects more than 4 inches into the path at a height of 28 inches (maximum 4 inches allowed between 27 and 80 inches above the floor or ground).</p> <p data-bbox="529 371 810 396">This occurs at all unit entries.</p>	<p data-bbox="1108 196 1388 310">Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>

C. COMMON USE AREAS

Inaccessible Common Area Features	Deficiency	Required Retrofit				
<p>12</p>  <p><i>Outlet at kitchenette countertop adjacent to refrigerator.</i></p>  <p><i>Clear width at countertop.</i></p>  <p><i>Clear width at countertop.</i></p>	<p>A countertop outlet does not have the minimum clear floor space required (minimum 48 inches required, at least one outlet in each countertop area must be accessible). Refrigerator blocks parallel approach.</p> <table border="0"> <tr> <td data-bbox="529 428 808 451"><u>Location</u></td> <td data-bbox="856 428 1050 451"><u>Width of clear space</u></td> </tr> <tr> <td data-bbox="529 456 808 479">Kitchen, right of refrigerator</td> <td data-bbox="940 456 1008 479">21-1/2</td> </tr> </table>	<u>Location</u>	<u>Width of clear space</u>	Kitchen, right of refrigerator	21-1/2	<p>In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
<u>Location</u>	<u>Width of clear space</u>					
Kitchen, right of refrigerator	21-1/2					

Inaccessible Mail Center Features	Deficiency	Required Retrofit																																																		
<p>13</p>  <p><i>Mail center at Building 1.</i></p>  <p><i>Typical mailbox frame.</i></p>  <p><i>Measurement of top 3 rows of mailboxes.</i></p>	<p>Of 64 mailboxes at this location, the top 3 rows (24 mailbox locations) serving covered units are above reach range (maximum 54 inches allowed). Method of assigning mailboxes is not known.</p> <table border="1" data-bbox="535 332 924 1120"> <thead> <tr> <th>Location</th> <th>Height (inches)</th> </tr> </thead> <tbody> <tr><td>Box 1</td><td>63-1/4</td></tr> <tr><td>Box 2</td><td>59-5/8</td></tr> <tr><td>Box 3</td><td>56-1/2</td></tr> <tr><td>Box 10</td><td>63-1/4 +/-</td></tr> <tr><td>Box 11</td><td>59-5/8 +/-</td></tr> <tr><td>Box 12</td><td>56-1/2 +/-</td></tr> <tr><td>Box 17</td><td>63-1/4 +/-</td></tr> <tr><td>Box 18</td><td>59-5/8 +/-</td></tr> <tr><td>Box 19</td><td>56-1/2 +/-</td></tr> <tr><td>Box 26</td><td>63-1/4 +/-</td></tr> <tr><td>Box 27</td><td>59-5/8 +/-</td></tr> <tr><td>Box 28</td><td>56-1/2 +/-</td></tr> <tr><td>Box 33</td><td>63-1/4 +/-</td></tr> <tr><td>Box 34</td><td>59-5/8 +/-</td></tr> <tr><td>Box 35</td><td>56-1/2 +/-</td></tr> <tr><td>Box 42</td><td>63-1/4 +/-</td></tr> <tr><td>Box 43</td><td>59-5/8 +/-</td></tr> <tr><td>Box 44</td><td>56-1/2 +/-</td></tr> <tr><td>Box 49</td><td>63-1/4 +/-</td></tr> <tr><td>Box 50</td><td>59-5/8 +/-</td></tr> <tr><td>Box 51</td><td>56-1/2 +/-</td></tr> <tr><td>Box 58</td><td>63-1/4 +/-</td></tr> <tr><td>Box 59</td><td>59-5/8 +/-</td></tr> <tr><td>Box 60</td><td>56-1/2 +/-</td></tr> </tbody> </table>	Location	Height (inches)	Box 1	63-1/4	Box 2	59-5/8	Box 3	56-1/2	Box 10	63-1/4 +/-	Box 11	59-5/8 +/-	Box 12	56-1/2 +/-	Box 17	63-1/4 +/-	Box 18	59-5/8 +/-	Box 19	56-1/2 +/-	Box 26	63-1/4 +/-	Box 27	59-5/8 +/-	Box 28	56-1/2 +/-	Box 33	63-1/4 +/-	Box 34	59-5/8 +/-	Box 35	56-1/2 +/-	Box 42	63-1/4 +/-	Box 43	59-5/8 +/-	Box 44	56-1/2 +/-	Box 49	63-1/4 +/-	Box 50	59-5/8 +/-	Box 51	56-1/2 +/-	Box 58	63-1/4 +/-	Box 59	59-5/8 +/-	Box 60	56-1/2 +/-	<p>Ensure that mailboxes serving ground floor residents comply with ANSI 4.2.6.</p>
Location	Height (inches)																																																			
Box 1	63-1/4																																																			
Box 2	59-5/8																																																			
Box 3	56-1/2																																																			
Box 10	63-1/4 +/-																																																			
Box 11	59-5/8 +/-																																																			
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Box 19	56-1/2 +/-																																																			
Box 26	63-1/4 +/-																																																			
Box 27	59-5/8 +/-																																																			
Box 28	56-1/2 +/-																																																			
Box 33	63-1/4 +/-																																																			
Box 34	59-5/8 +/-																																																			
Box 35	56-1/2 +/-																																																			
Box 42	63-1/4 +/-																																																			
Box 43	59-5/8 +/-																																																			
Box 44	56-1/2 +/-																																																			
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Box 58	63-1/4 +/-																																																			
Box 59	59-5/8 +/-																																																			
Box 60	56-1/2 +/-																																																			

EXHIBIT 5.3

Kittrell Place Matrix of Required Retrofits to Covered Unit Interiors

KITTRELL PLACE APARTMENTS: COVERED UNIT INTERIORS

D. INACCESSIBLE FEATURES AT COVERED DWELLING UNITS

Unit Types by Building:

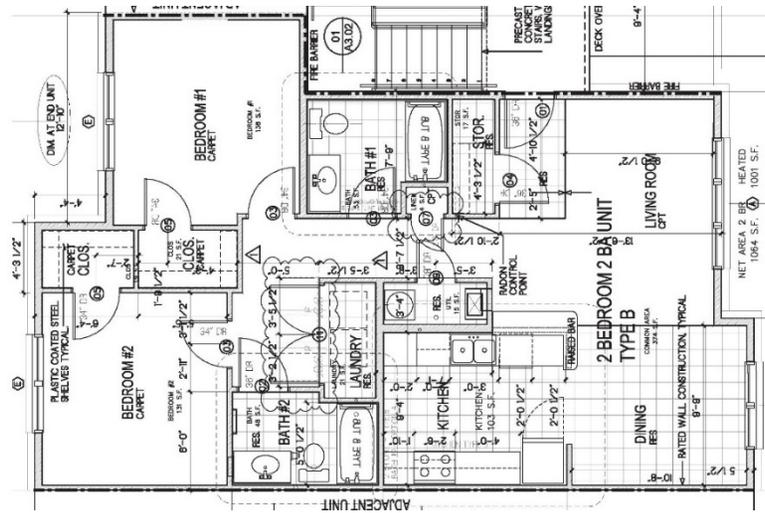
Bldg.	Unit Types								Covered	Overall
	1st Floor (Covered Units)				2nd Floor		3rd Floor			
No./ Addr.	2b2b B	2b2b A	3b2b B	3b2b A	2b B	3b B	2b B	3b B		
1 4117	Community Building				-		-			
2 4141	2	2	0	0	4	0	-		4	8
3 4137	2	0	2	0	2	2	-		4	8
4 4133	1	1*	1	1	2	2	2	2	4	12
5 4129	2	0	2	0	2	2	2	2	4	12
6 4125	1	1*	1	1	2	2	2	2	4	12
7 4121	2	0	0	2*	2	2	2	2	4	12
Total	10	4	6	4	14	10	8	8	24	64

* - Designated Type A unit with roll-in shower (4 total)

UNIT TYPE: 2 Bedroom, 2 Bathroom (Type B)

Surveyed Unit 4137-102 and Unit 4137-103 – Typical for 10 total units

Unit Plan. (A2.01/01).



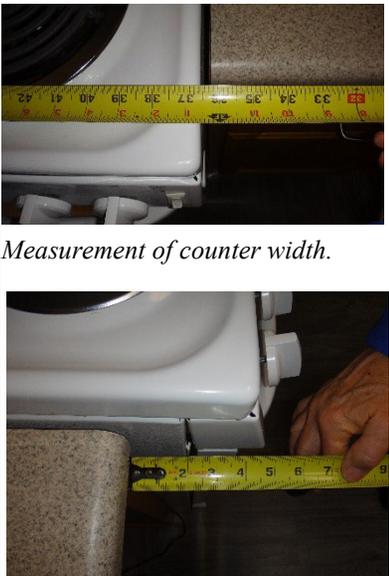
Numbers	Photos	Deficiency	Required Retrofit						
14	 <p data-bbox="283 527 688 600"><i>Height of kitchen countertop in Unit 4137-102.</i></p> <p data-bbox="283 917 688 990"><i>Outlet over countertop in Unit 4137-102.</i></p>	<p data-bbox="741 248 1507 324">Kitchen and bathroom outlets over counters are more than 46 inches above the floor (maximum 46 inches allowed).</p> <table data-bbox="741 365 1260 527"> <thead> <tr> <th data-bbox="741 406 861 438"><u>Location</u></th> <th data-bbox="1144 365 1260 438"><u>Height (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="741 446 1039 479">Unit 4137-102 kitchen</td> <td data-bbox="1165 446 1260 479">47-1/2</td> </tr> <tr> <td data-bbox="741 487 1081 519">Unit 4137-103 master bath</td> <td data-bbox="1165 487 1260 519">47-1/8</td> </tr> </tbody> </table>	<u>Location</u>	<u>Height (inches)</u>	Unit 4137-102 kitchen	47-1/2	Unit 4137-103 master bath	47-1/8	<p data-bbox="1518 248 1824 613">In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
<u>Location</u>	<u>Height (inches)</u>								
Unit 4137-102 kitchen	47-1/2								
Unit 4137-103 master bath	47-1/8								

Numbers	Photos	Deficiency	Required Retrofit
15	 <p data-bbox="285 423 730 495"><i>Counter area left of range in Unit 4137-102.</i></p>  <p data-bbox="285 678 730 719"><i>Measurement of counter width.</i></p>  <p data-bbox="285 938 730 1011"><i>Range extension from countertop is 1-1/4 inches</i></p>  <p data-bbox="285 1222 730 1263"><i>Counter depth is 25-1/4 inches.</i></p>	<p data-bbox="741 248 1518 410">Outlets above kitchen countertops between the stove and the wall lack the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).</p>	<p data-bbox="1528 248 1824 613">In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>

Numbers	Photos	Deficiency	Required Retrofit
16		Extent of blocking in bathrooms cannot be determined without destructive testing.	Provide an affidavit to confirm reinforcements are installed to comply with Requirement 6.

UNIT TYPE: 2 Bedroom, 2 Bathroom – (Type A)
 Surveyed Unit 4141-102 and Unit 4141-103 – Typical for 2 total units
Unit Plan. (A2.01/02).

Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofit
17	 <p data-bbox="285 483 617 516"><i>Measurement of counter width.</i></p> <p data-bbox="285 833 646 865"><i>Range extension from countertop.</i></p>	<p data-bbox="741 248 1472 362">Outlet above kitchen countertop lacks the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).</p> <p data-bbox="741 370 1163 402">This occurs in all units surveyed.</p>	<p data-bbox="1520 248 1824 613">In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>

Numbers	Photos	Deficiency	Required Retrofit
UNIT TYPE: 2 Bedroom, 2 Bathroom (Type A with Roll-in Shower)			
Surveyed Unit 4125-102 – Typical for 2 total units			
<i>Bath #1 with Roll-in Shower. (A2.01/03).</i>			
<i>Unit Plan. (A2.01/02).</i>			
Inaccessible Features:			

Numbers	Photos	Deficiency	Required Retrofit
18	 <p data-bbox="285 505 722 578"><i>Counter area left of range in Unit 4125-102.</i></p>  <p data-bbox="285 784 684 816"><i>Measurement of counter width.</i></p>  <p data-bbox="285 1187 716 1219"><i>Range extension from countertop.</i></p>	Outlet above kitchen countertop lacks the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).	In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.
18a.		Extent of blocking in Bath 2 cannot be determined without destructive testing.	Provide an affidavit to confirm reinforcements are installed to comply with Requirement 6.

Numbers Photos

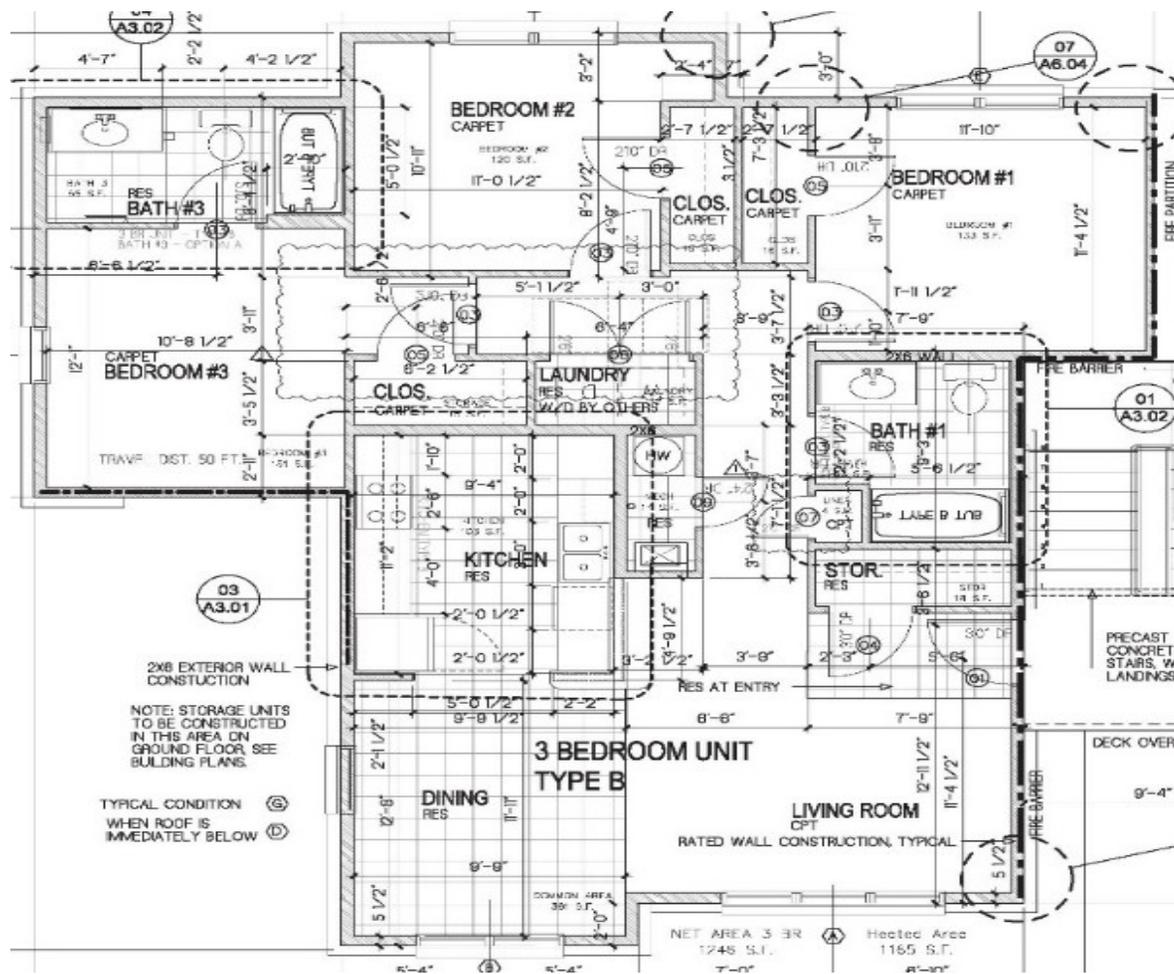
Deficiency

**Required
Retrofit**

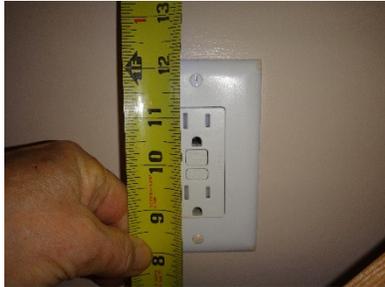
UNIT TYPE: 3 Bedroom, 2 Bathroom (Type B)

Surveyed Unit 4137-104 and Unit 4129-101 – Typical for 6 total units

Unit Plan. (A2.02/01).



Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofit
19	 <p data-bbox="281 756 686 824"><i>Height of kitchen countertop in Unit 4137-104.</i></p>	Outlets over counters are more than 46 inches above the floor (maximum 46 inches allowed).	In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.
	 <p data-bbox="281 1175 676 1243"><i>Outlet over countertop in Unit 4137-104</i></p>	<p data-bbox="1140 329 1234 362">Height</p> <p data-bbox="741 370 1262 402"><u>Location</u> <u>(inches)</u></p> <p data-bbox="741 410 1262 443">Unit 4129-101 hall bath 47-1/4</p>	

Numbers	Photos	Deficiency	Required Retrofit
20	 <p data-bbox="289 553 716 613"><i>Counter area left of range in Unit 4137-104.</i></p>  <p data-bbox="289 870 617 902"><i>Measurement of counter width.</i></p>  <p data-bbox="289 1154 642 1187"><i>Range extension from countertop</i></p>	<p data-bbox="741 248 1472 362">Outlets above kitchen countertops lack the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).</p>	<p data-bbox="1524 248 1824 613">In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
21		<p data-bbox="741 1230 1440 1304">Extent of blocking in bathrooms cannot be determined without destructive testing.</p>	<p data-bbox="1524 1230 1824 1360">Provide an affidavit to confirm reinforcements are installed to comply with Requirement 6.</p>

Numbers

Photos

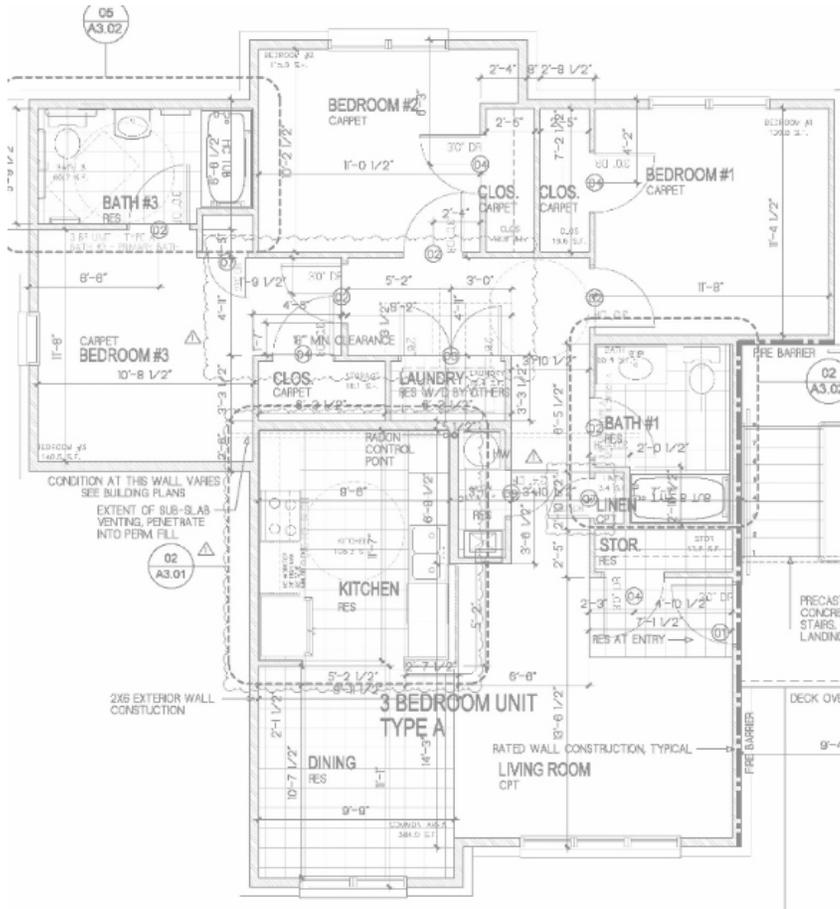
Deficiency

Required
Retrofit

UNIT TYPE: 3 Bedroom, 2 Bathroom (Type A)

Surveyed Unit 4133-101 and Unit 4125-101 – Typical for 2 total units

Unit Plan. (A2.02/02).



Inaccessible Features:

Numbers	Photos	Deficiency	Required Retrofit				
22	 <p data-bbox="285 594 674 670"><i>Outlet over countertop in Unit 101, Building 4.</i></p>	<p data-bbox="741 248 1507 321">Outlets over obstructions are more than 46 inches above the floor (maximum 46 inches allowed).</p> <table border="0" data-bbox="741 370 1507 483"> <thead> <tr> <th data-bbox="741 410 863 443"><u>Location</u></th> <th data-bbox="1140 370 1255 443"><u>Height (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="741 451 1052 483">Unit 4125-101 hall bath</td> <td data-bbox="1182 451 1266 483">47-1/4</td> </tr> </tbody> </table>	<u>Location</u>	<u>Height (inches)</u>	Unit 4125-101 hall bath	47-1/4	<p data-bbox="1518 248 1822 613">In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
<u>Location</u>	<u>Height (inches)</u>						
Unit 4125-101 hall bath	47-1/4						

Numbers	Photos	Deficiency	Required Retrofit
23	 <p data-bbox="279 544 737 609"><i>Counter area right of range in Unit 4133-101.</i></p> <p data-bbox="279 901 737 933"><i>Measurement of counter width.</i></p> <p data-bbox="279 1242 737 1274"><i>Range extension from countertop</i></p>	<p data-bbox="737 251 1516 365">Outlets above kitchen countertops lack the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).</p>	<p data-bbox="1516 251 1824 609">In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>

Numbers	Photos	Deficiency	Required Retrofit
24		Extent of blocking in hall bathrooms cannot be determined without destructive testing.	Provide an affidavit to confirm reinforcements are installed to comply with Requirement 6.

Numbers

Photos

Deficiency

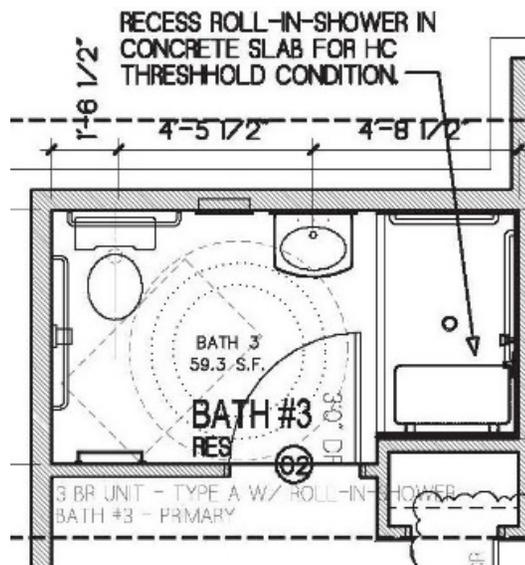
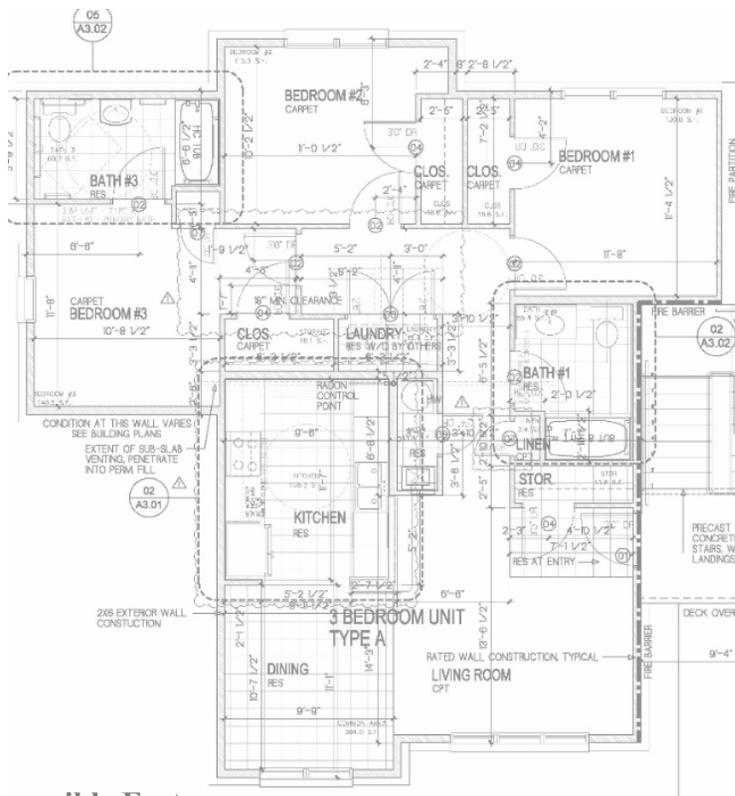
Required
Retrofit

UNIT TYPE: 3 Bedroom, 2 Bathroom (Accessible Roll-in Shower)

Surveyed Unit 4121-104 – Typical for 2 total units

Bath #3 with Roll-in Shower. (A2.02/03).

Unit Plan. (A2.02/02).



Inaccessible Features:

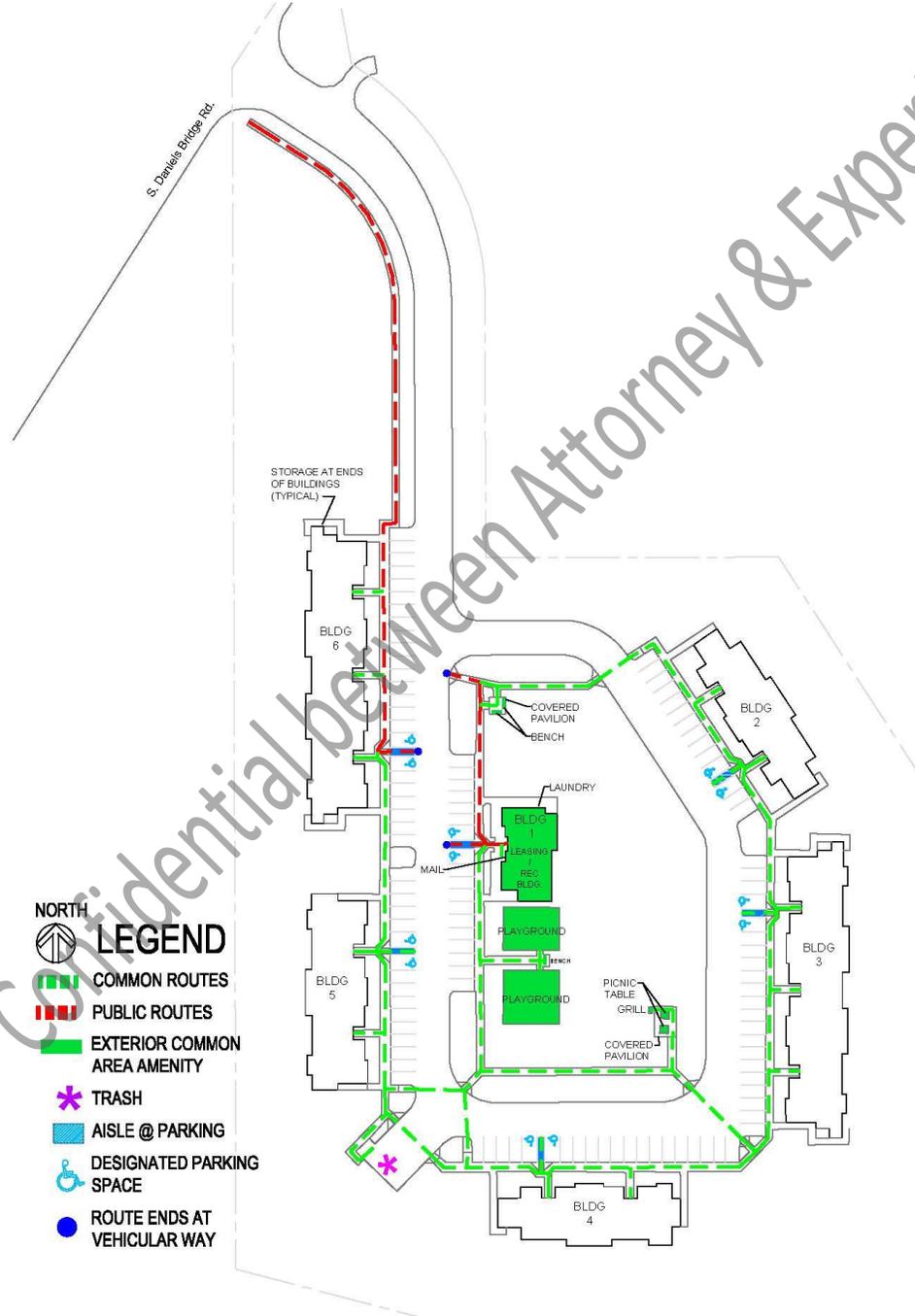
Numbers	Photos	Deficiency	Required Retrofit				
25	 <p data-bbox="285 651 695 722"><i>Outlet over vanity in Unit 4121-104.</i></p>	<p data-bbox="741 248 1514 326">Outlets over obstructions are more than 46 inches above the floor (maximum 46 inches allowed).</p> <table data-bbox="741 370 1270 488"> <thead> <tr> <th data-bbox="741 410 863 443"><u>Location</u></th> <th data-bbox="1150 370 1270 443"><u>Height (inches)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="741 451 1052 483">Unit 4121-104 hall bath</td> <td data-bbox="1182 451 1270 483">47-3/8</td> </tr> </tbody> </table>	<u>Location</u>	<u>Height (inches)</u>	Unit 4121-104 hall bath	47-3/8	<p data-bbox="1524 248 1824 613">In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>
<u>Location</u>	<u>Height (inches)</u>						
Unit 4121-104 hall bath	47-3/8						
26	 <p data-bbox="285 1068 720 1140"><i>Counter area left of range in Unit 4121-104.</i></p>	<p data-bbox="741 730 1514 849">Outlet above kitchen countertop lacks the required clear floor space for approach (at least 1 outlet in each counter area must have clear floor space for approach).</p>	<p data-bbox="1524 730 1824 1096">In accordance with agreed-upon tolerances, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation.</p>				

Numbers	Photos	Deficiency	Required Retrofit
	 <p data-bbox="281 605 684 638"><i>Measurement of counter width.</i></p>  <p data-bbox="281 886 716 919"><i>Range extension from countertop.</i></p>		
27		Extent of blocking in the hall bathroom cannot be determined without destructive testing.	Provide an affidavit to confirm reinforcements are installed to comply with Requirement 6.

EXHIBIT 6.1

Enfield Pointe Accessible Route

Draft - Confidential between Attorney & Expert



- NORTH**
 **LEGEND**
-  COMMON ROUTES
 -  PUBLIC ROUTES
 -  EXTERIOR COMMON AREA AMENITY
 -  TRASH
 -  AISLE @ PARKING
 -  DESIGNATED PARKING SPACE
 -  ROUTE ENDS AT VEHICULAR WAY

Exhibit 6.2

Enfield Pointe Matrix of Required Retrofits to Public and Common Use Areas

ENFIELD POINTE APARTMENTS: PUBLIC AND COMMON USE AREAS

A. INACCESSIBLE FEATURES PUBLIC AND COMMON AREAS

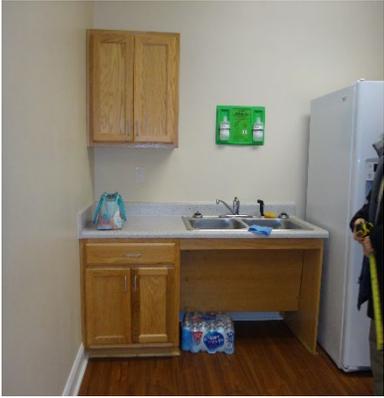
Numbers	Inaccessible Brochure Holder	Deficiency	Required Retrofit
1	 <p><i>Brochure holder.</i></p>	The brochure holder is 55-1/2 inches above the floor (maximum 54 inches allowed).	Relocate brochure holder to comply with ANSI 4.2.6.
Inaccessible Restroom Features			
2	 <p><i>Height of coat hook in women's restroom.</i></p>	The women's restroom coat hook is more than 56-1/2 inches above the floor (maximum 54 inches allowed).	Modify coat hook to comply with ANSI 4.2.6.

Numbers	Inaccessible Brochure Holder	Deficiency	Required Retrofit
3	 <p data-bbox="467 1524 500 1845"><i>Toilet in men's restroom.</i></p>  <p data-bbox="824 1465 899 1845"><i>Dimension from wall to toilet centerline.</i></p>	<p data-bbox="167 842 277 1383">The men's restroom toilet centerline is approximately 19-1/2 inches from the side wall (maximum 18 inches required).</p>	<p data-bbox="167 573 290 804">Modify toilet by installing offset toilet flange to comply with ANSI 4.16.2.</p>
4	 <p data-bbox="1437 1486 1469 1845"><i>Toilet in women's restroom.</i></p>	<p data-bbox="914 831 1141 1383">The toilet paper dispensers are not in front of the nose of the toilets, are less than 7 inches from the nose of the toilet, and are less than 36 inches from the back wall (minimum 7 inches and maximum 9 inches required from nose of toilet).</p>	<p data-bbox="914 590 1002 804">Modify toilet paper dispenser to comply with ANSI 4.16.6.</p>

Numbers	Inaccessible Brochure Holder	Deficiency	Required Retrofit
	 <p data-bbox="247 462 688 535"><i>Dimension from rear wall to nose of toilet.</i></p>  <p data-bbox="247 860 688 933"><i>Dimension from rear wall to toilet paper dispenser.</i></p>		

Numbers	Inaccessible Brochure Holder	Deficiency	Required Retrofit								
B. ROUTES TO COMMON AREAS & COVERED DWELLING UNITS											
Protruding Objects											
5	 <p data-bbox="245 873 558 943"><i>Light fixture at unit 102 breezeway.</i></p>  <p data-bbox="245 1312 485 1349"><i>Protruding height</i></p>	<p data-bbox="709 329 1289 557">Typical breezeway lights and fire extinguisher cabinets protrude more than 4 inches into the circulation path (maximum 4 inches allowed). Each breezeway has two lights and one fire extinguisher cabinet at the first floor.</p> <table border="1" data-bbox="709 610 1289 805"> <thead> <tr> <th data-bbox="709 610 1108 683">Breezeway Location</th> <th data-bbox="1108 610 1289 683">Protrusion (inches)</th> </tr> </thead> <tbody> <tr> <td data-bbox="709 691 1108 724">Unit 102 light fixture</td> <td></td> </tr> <tr> <td data-bbox="709 732 1108 764">Depth of protrusion</td> <td data-bbox="1108 732 1289 764">6-1/2</td> </tr> <tr> <td data-bbox="709 773 1108 805">Height to bottom</td> <td data-bbox="1108 773 1289 805">77-3/4</td> </tr> </tbody> </table>	Breezeway Location	Protrusion (inches)	Unit 102 light fixture		Depth of protrusion	6-1/2	Height to bottom	77-3/4	<p data-bbox="1289 329 1556 524">Modify protruding objects that project more than 5" into the circulation path to comply with ANSI 4.4.1.</p>
Breezeway Location	Protrusion (inches)										
Unit 102 light fixture											
Depth of protrusion	6-1/2										
Height to bottom	77-3/4										

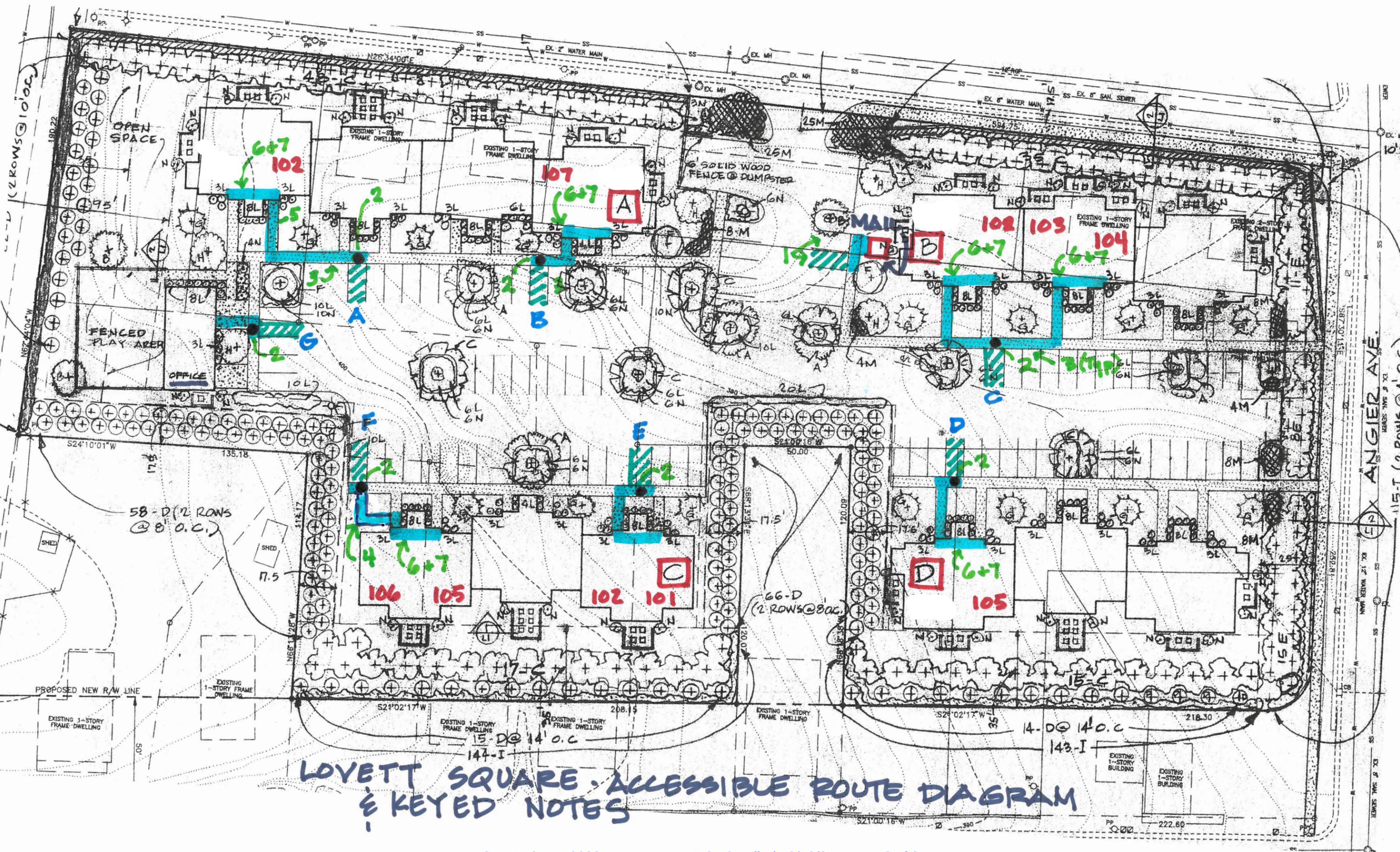
Numbers	Inaccessible Brochure Holder	Deficiency	Required Retrofit
	 <p data-bbox="247 521 483 557"><i>Protruding depth.</i></p>  <p data-bbox="247 881 493 917"><i>Typical breezeway</i></p>		
Other Inaccessible Common Area Features			

Numbers	Inaccessible Brochure Holder	Deficiency	Required Retrofit
6	 <p data-bbox="247 586 491 618"><i>Sink at kitchenette.</i></p>  <p data-bbox="247 987 590 1019"><i>Measurement of toe space.</i></p>	<p data-bbox="716 167 1283 240">Toe space at kitchenette is 7-1/2 inches high (minimum 9 inches required).</p>	<p data-bbox="1295 167 1549 261">Modify toe space to comply with ANSI 4.19.3.</p>

Numbers	Inaccessible Brochure Holder	Deficiency	Required Retrofit
7	 <p><i>Outlet and microwave at kitchenette.</i></p>  <p><i>Clear width at countertop.</i></p>	<p>The countertop outlet and microwave do not have the minimum clear floor space required. Refrigerator blocks parallel approach. The clear space is 27-1/2 inches wide (minimum 48 inches required for parallel approach).</p>	<p>Subject to tolerances contained in the agreed-upon remediation protocols, modify existing outlet or install a GFI-rated, molded, multi-plug outlet with commercial grade components to bring outlet into compliance with Requirement #5. Any such outlet must be approved by the United States prior to installation. In addition, relocate microwave to comply with 4.2.6.</p>

EXHIBIT 7.1

Lovett Square Accessible Route and Keyed Notes



**LOYETT SQUARE - ACCESSIBLE ROUTE DIAGRAM
& KEYED NOTES**

Exhibit 7.2

Lovett Square Matrix of Required Retrofits to Public and Common Use Areas

LOVETT SQUARE APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Inaccessible Features at Public and Common Use Areas	Deficiency	Required Retrofit
1	See Accessible Route Plan and Keyed Notes Item 1.	There is a lack of accessible parking.	Install a new designated accessible parking space adjacent to the existing access aisle at the mail center. Include posted sign, stripping and ISA on the pavement to comply with ANSI 4.6.2.
2	See Accessible Route Plan and Keyed Notes Item 2.	<p>The following curb ramps have running slopes of more than 8.33% and/or cross slopes of more than 2%:</p> <ul style="list-style-type: none"> • Access Aisle A (Building A, Units 102) • Access Aisle B (Building A, Units 107) • Access Aisle C (Building B, Units 102, 103, and 104) • Access Aisle D (Building D, Units 105) • Access Aisle E (Building C, Units 101 and 102) • Access Aisle F (Building C, Units 105 and 106) • Access Aisle G (Leasing/Clubhouse) 	Install curb ramps with running slopes no more than 8.33% and cross slopes of no more than 2% to comply with ANSI 4.7.2 and 4.8.2.
3	See Accessible Route Plan and Keyed Notes Item 3.	Parked vehicles overhang and reduce the width of an accessible route to less than 36" wide maximum.	Install wheel-stops at parking spaces which adjoin the accessible route as indicated on the Accessible Route Diagram to comply with ANSI 4.3.3 and 4.6.2.

LOVETT SQUARE APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Inaccessible Features at Public and Common Use Areas	Deficiency	Required Retrofit
4	See Accessible Route Plan and Keyed Notes Item 4.	There is no permanent accessible route from the sidewalk in front of Building C (Units 105 and 106) to the breezeway.	Replace the ramp from the sidewalk in front of Building C. Ramp to have running slopes of no more than 8.33% and cross slopes of no more than 2%. The landings are to slope no more than 2% in both directions. Ramp to include handrails, handrail extensions, and edge protection at both sides of the ramp runs to comply with ANSI 4.3.2 and 4.8.
5	See Accessible Route Plan and Keyed Notes Item 5.	There is no accessible route to Building A, Unit 102.	Install a permanent and compliant accessible route in compliance with ANSI 4.3.7.
6	See Accessible Route Plan and Keyed Notes Item 6.	At all the breezeways, fire extinguishers protrude into the accessible route.	Relocate or Install permanent cane detectable barrier to comply with ANSI 4.4.1.
7	See Accessible Route Plan and Keyed Notes Item 7.	At all breezeways, wall sconces protrude more than 4" into the accessible route.	Replace wall sconces with a compliant fixture that will not protrude more than 4" from the wall to comply with ANSI 4.4.1. Alternatively, install cane detection to comply with ANSI.
8		The mailboxes are inaccessible--the top row is 62 inches above the slab and the second row is 56.75 inches above the slab.	Lower mailboxes so that the top most lock is no more than 54 inches about the adjacent concrete to comply with ANSI 4.2.6. Alternatively, provide written confirmation that all ground-floor units are assigned mailboxes with locks no more than 54" above the ground level.

LOVETT SQUARE APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Inaccessible Features at Public and Common Use Areas	Deficiency	Required Retrofit
9		The drinking fountain is inaccessible.	Remove the inaccessible drinking fountain.
10		The leasing office/clubhouse entry and all the interior clubhouse doors have inaccessible knob type hardware that requires tight grasping, pinching, and/or turning.	Install accessible lever door hardware where the existing hardware is knob style to comply with ANSI 4.13.9.
11		Restroom mirror in the clubhouse/leasing office is inaccessible.	Lower restroom mirror so that the bottom edge of the reflecting surface is no more than 40" above the floor to comply with ANSI 4.19.6.
12		The rear grab bar in the restroom in the clubhouse/leasing office is inaccessible.	Replace rear grab bar with a 36" long bar that is 6" from side wall to the centerline of the first escutcheon to comply with ANSI 4.17.6.
13		The pipes in the restrooms in the accessible toilet room of the leasing office/clubhouse and the pipes in the restroom in the multipurpose room are not insulated.	Install pipe protection in these restrooms to comply with ANSI 4.19.4.

EXHIBIT 8.1

Sherwood Park Accessible Route and Keyed Notes

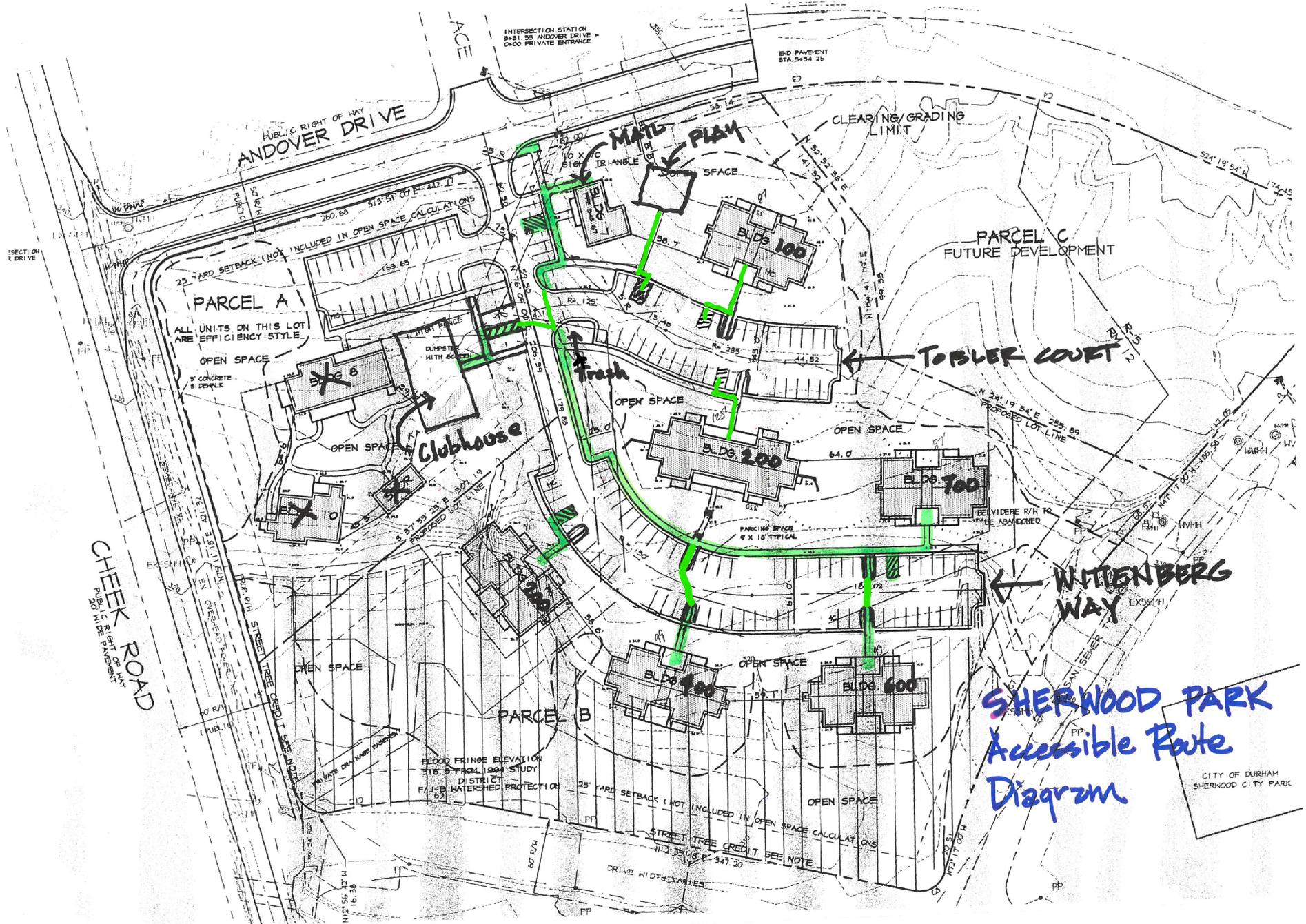


Exhibit 8.2

Sherwood Park Matrix of Required Retrofits to Public and Common Use Areas

SHERWOOD PARK APARTMENTS: PUBLIC AND COMMON USE AREAS

	Inaccessible Features at Public and Common Areas		
Numbers		Deficiency	Required Retrofit
1	See Keyed Plan Item 1.	There is a lack of accessible parking at the play area and Building 200 on Tobler Court.	Install a new designated accessible parking space and access aisle serving play area and building 200. Replace existing curb ramp or install new curb ramp connecting the parking access aisle to the accessible route to play area and Building 200. Include signage and stripping to comply with ANSI 4.6.2.

SHERWOOD PARK APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers		Deficiency	Required Retrofit
2	See Accessible Route Plan and Keyed Notes Item 2.	There is a lack of an accessible route throughout the property.	Install a new curb ramp and adjacent sidewalk flag(s) as required to provide an accessible route indicated on the Keyed Notes at 7 locations: Andover Drive, Building 100 (Tobler) Leasing Office, mail center, Building 200 parking access aisle, trash area, and Building 700 to comply with ANSI 4.7.2 and 4.8.2.

SHERWOOD PARK APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers		Deficiency	Required Retrofit
3	See Keyed Notes Item 3.	At two locations, the leasing office and the mail center, the accessible parking spaces and access aisles had cross and running slopes exceeding the maximum percentages allowed.	Repave/grind or top asphalt as required to flatten (to 2% slopes in both running and cross directions) the designated accessible parking spaces and aisles at two locations: the leasing office and the mail center to comply with ANSI 4.3.7.
4	See Keyed Notes Item 4.	At all the breezeways, fire extinguishers are mounted higher than 27" above the ground level and protruded more than 4" into an accessible route.	Relocate or install a permanent cane detectable barrier at each unit to comply with ANSI 4.4.1.

SHERWOOD PARK APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers		Deficiency	Required Retrofit
5	See Keyed Notes Item 5.	At all ground-floor covered unit entrances, light fixtures protrude more than 4" into the accessible route and are mounted between 27" to less than 80" above the ground level; measured at approximately 6" from adjacent wall.	Relocate the light fixtures to no less than 80" above the ground level or replace with a compliant fixture that will not protrude more than 4" from adjacent wall to comply with ANSI 4.4.1. Alternatively, install cane detection.
6	See Keyed Notes Item 6.	Parked vehicles overhang and reduce the width of an accessible route to less than 36" wide maximum.	Install wheel-stops at parking spaces which adjoin the accessible route as indicated on the Keyed Notes to comply with ANSI 4.3.

SHERWOOD PARK APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers		Deficiency	Required Retrofit
7		<p>The mailboxes are inaccessible--the two top rows are 58.75 and 64 inches above the slab.</p>	<p>Lower mailboxes so that the topmost lock is no more than 54 inches about the adjacent concrete to comply with ANSI 4.2.6. Alternatively, provide written confirmation that all ground-floor units are assigned mailboxes with locks no more than 54" above the ground level.</p>
8		<p>The leasing office/clubhouse entry and all the interior clubhouse doors have inaccessible knob type hardware that requires tight grasping, pinching, and/or turning.</p>	<p>Install accessible lever door hardware where the existing hardware is knob style to comply with ANSI 4.13.9.</p>

SHERWOOD PARK APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers		Deficiency	Required Retrofit
9		The clubhouse sink is inaccessible.	Replace clubhouse sink base cabinet and portion of the counter to provide compliant knee clearance to comply with ANSI 4.19.2.2. New sink base/counter to be at 34" maximum above the floor and have clear knee space for forward approach to the fixture. Note: doors that fold back may be installed, but knee space and pipe protection and floor finishes must be provided.
10		In the clubhouse kitchen, the door maneuvering clearance is less than 18" on pull side; measured at 16".	Remove clubhouse kitchen door to comply with ANSI 4.13.6. Alternatively, reverse the swing of kitchen door outwards.

SHERWOOD PARK APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers		Deficiency	Required Retrofit
11		The clubhouse paper towel dispenser is inaccessible.	Relocate clubhouse kitchen paper towel dispenser to a location within reach range (54" maximum above the floor for side approach) to comply with ANSI 4.2.6. If dispenser is moved to circulation space, provide a permanently installed cane detectable barrier.

Exhibit 8.3

Sherwood Park Matrix of Required Retrofits to Covered Unit Interiors

SHERWOOD PARK APARTMENTS: COVERED UNIT INTERIORS

	Inaccessible Features at Covered Dwelling Units		
Numbers	Photos	Deficiency	Required Retrofit
	<p>Required retrofits associated with the below line items shall be performed at all first floor units (2BR+1BA and 3BR+2BA) in Buildings 100 and 200 on Tobler Court, and in Buildings 200, 400, 600 and 700 on Wittenberg Way. See Accessible Route Plan & Keyed Notes.</p>		
1		Covered dwelling units have inaccessible knob type hardware that requires tight grasping, pinching, and/or turning.	Install accessible lever door hardware at all covered ground floor dwelling units where the existing hardware is knob style on the exterior side to comply with ANSI 4.13.9.
3		Thermostats are mounted higher than 48" above finished floor.	Lower thermostats to comply with Requirement 5.

SHERWOOD PARK APARTMENTS: COVERED UNIT INTERIORS

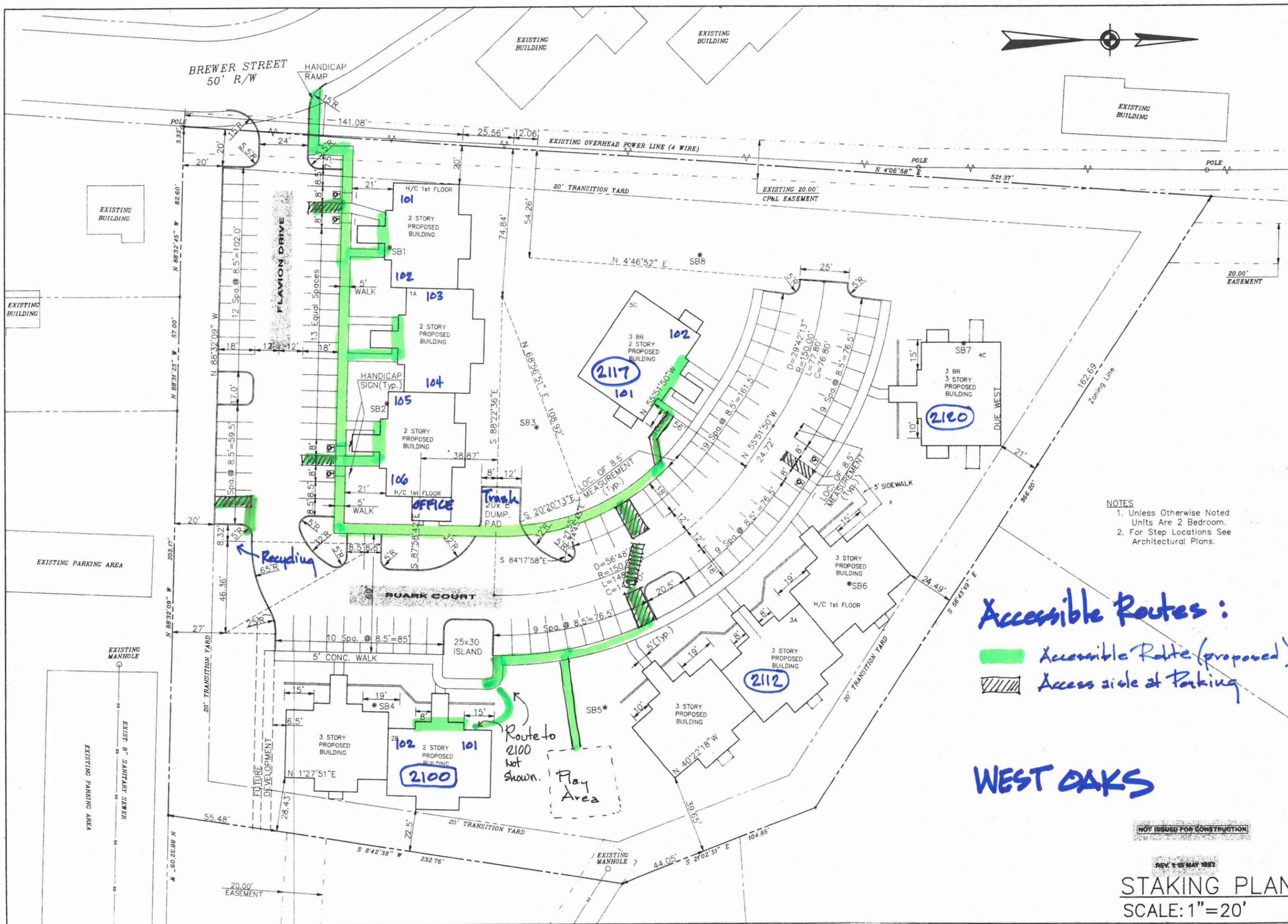
4		Sliding door tracks to the patio are higher than 3/4" maximum and not beveled on the interior side.	Provide bevel strips at interior side of sliding door track to comply with Requirement 4(4).
5		In the hall bathroom, 30"x48" clear floor space outside of the door swing is not provided.	Reverse the hall bathroom door swing (door to swing into the hallway) to comply with Requirement 7(2)(a)(i).
6		In the hall bathroom, the centerline of the lavatory is less than 24" from adjacent wall; measured at 14 1/2.	Replace lavatory base cabinet and install offset sink such that lavatory is aligned with clear floor space. Include removable cabinet that is no less than 30" wide. Removal of the cabinet must provide finished clear knee space centered on the lavatory and insulated pipes to comply with Requirement (7)(2)(a)(ii).
<p>Required retrofits associated with the below line items shall be performed at all two-bedroom first floor units in Buildings 100 and 200 on Tobler Court, and in Buildings 200, 400, 600 and 700 on Wittenberg Way. See Accessible Route Plan & Keyed Notes.</p>			

SHERWOOD PARK APARTMENTS: COVERED UNIT INTERIORS

7		The door clear openings for the hall bathroom and Bedrooms 1 and 2 are less than 31 5/8" (minimum 31 5/8" required).	Widen the hall bathroom door and doors to Bedroom 1 and Bedroom 2 to provide 31 5/8" minimum to comply with Requirement 3(2).
<p>Required retrofits associated with the below line items shall be performed at all three-bedroom first floor units in Buildings 100 and 200 on Tobler Court, and in Buildings 200, 400, 600 and 700 on Wittenberg Way. See Accessible Route Plan & Keyed Notes.</p>			
8		The door clear openings all bedrooms are less than 31 5/8" (minimum 31 5/8" required).	Widen the doors to all bedrooms to provide 31 5/8" minimum to comply with Requirement 3(2).

EXHIBIT 9.1

West Oaks Accessible Route and Key Plan



CONSULTANT
 W. MCGINNIS ENGINEERING
 2000 W. LAFAYETTE STREET
 RALEIGH, N.C. 27604



J.W. MCGINNIS, ARCHITECT
 2662 S. LAFAYETTE STREET
 SHELBY, N.C. (704) 482-8908



BREWER STREET APARTMENTS
 BREWER STREET RALEIGH, N.C.
 BREWER STREET APTS. LTD PARTNERSHIP

COMM #	891-2
DATE	12/22/92
REV	
SHEET	01
OF	02

NOTES
 1. Unless Otherwise Noted Units Are 2 Bedroom.
 2. For Step Locations See Architectural Plans.

Accessible Routes:

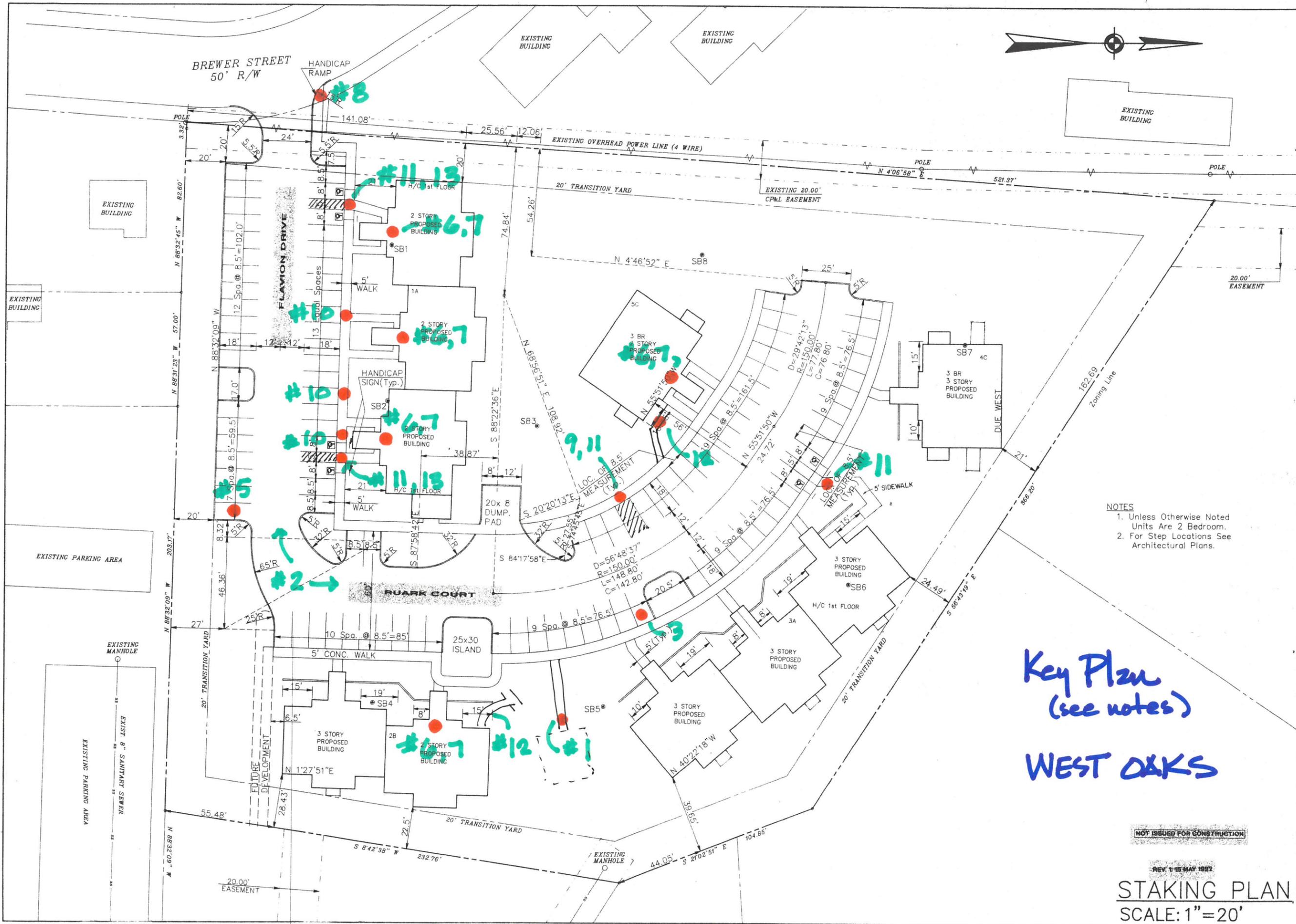
- Accessible Route (proposed)
- Access side of parking

WEST OAKS

NOT ISSUED FOR CONSTRUCTION

REV 1-15 MAY 1992

STAKING PLAN
 SCALE: 1"=20'



- NOTES**
1. Unless Otherwise Noted Units Are 2 Bedroom.
 2. For Step Locations See Architectural Plans.

Key Plan
(see notes)
WEST OAKS

NOT ISSUED FOR CONSTRUCTION

REV: 1-15 MAY 1992
STAKING PLAN
SCALE: 1"=20'

CONSULTANT
KING'S MOUNTAIN



J.W. MCGINNIS, ARCHITECT
2652 S. LAFAYETTE STREET
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(704) 482-8908

BREWER STREET APARTMENTS
BREWER STREET RALEIGH, N.C.
BREWER STREET APTS. LTD PARTNERSHIP

COMM. #	DATE	REV
091-2	10 APR 92	
SHEET	9	OF 8

Exhibit 9.2

West Oaks Matrix of Required Retrofits to Public and Common Use Areas

WEST OAKS APARTMENTS: PUBLIC AND COMMON USE AREAS

	Inaccessible Features at Public and Common Areas		
Numbers	Photos	Deficiency	Required Retrofit
1		Running slopes of the route/sidewalk to the playground are more than 5% maximum allowed; measured at 10%.	Modify running slopes to comply with ANSI 4.3.7 by creating 5% maximum running slopes or 8.33% maximum running slopes with compliant handrails and edge protections.
1a		There is no accessible route from the sidewalk to the entry point of the playground area.	Install compliant walkway from the entry of the playground and connect to the existing accessible route to comply with ANSI 4.3.

WEST OAKS APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Photos	Deficiency	Required Retrofit
2		Parked vehicles overhang and reduce the width of an accessible route to less than 36" wide maximum.	Install wheel-stops at parking spaces which adjoin the accessible route as indicated on the Accessible Route Plan to comply with ANSI 4.3.
3	See Accessible Route Plan and Key Plan.	There is a lack of accessible parking along the accessible route on the east side of the property.	Provide one new parking space on the east side of the complex. Space must be on the accessible route serving Building 2100 and the play area. See Key Plan #3 for proposed, not mandatory, location. Stripe a crossing to the accessible parking.

WEST OAKS APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Photos	Deficiency	Required Retrofit
4		There is no permanent accessible route to Building 2117.	Install a permanent and compliant accessible route to Building 2117. See Accessible Route Plan for location.
5	See Accessible Route Plan and Key Plan.	There is a lack of accessible parking at the recycling center.	Install an accessible parking space at the recycling center. See Key Plan #5 for location. Alternatively, relocate the recycling center to a compliant location.

WEST OAKS APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Photos	Deficiency	Required Retrofit
6		<p>At all the breezeways, fire extinguishers protrude more than 4" into the accessible route and are mounted higher than 27" above the ground level; measured at 5 3/4" from adjacent wall.</p>	<p>Relocate fire extinguishers in all the breezeways to a compliant location or install permanent cane detectable barrier to comply with ANSI 4.4.1.</p>
7		<p>At all ground-floor covered unit entrances, light fixtures protrude more than 4" into the accessible route and are mounted between 27" to less than 80" above the ground level; measured at approximately 6" from adjacent wall.</p>	<p>Relocate the light fixtures to no less than 80" above the ground level or replace with a compliant fixture that will not protrude more than 4" from adjacent wall to comply with ANSI 4.4.1. Alternatively, install cane detection.</p>

WEST OAKS APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Photos	Deficiency	Required Retrofit
8		<p>At the entrance to West Oaks at Brewer Street, the curb ramp has cross slopes exceeded 2% maximum.</p>	<p>Modify curb ramp to comply with ANSI 4.7.2 and 4.8.2 contingent upon approval from the City of Raleigh.</p>
9	<p>See Accessible Route Plan and Key Plan.</p>	<p>At between the dumpster pad and Building 2117/unit 101, the in-line curb ramp has cross slopes greater than 2% maximum.</p>	<p>Modify curb ramp to comply with ANSI 4.7.2 and 4.8.2.</p>

WEST OAKS APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Photos	Deficiency	Required Retrofit
10		<p>The cross slopes of the sidewalk are more than 2% maximum at the following three locations: 1. Along the accessible route parallel to Flavion Drive at the sidewalk parallel to, and in between, Units 105 and 106; 2. At the sidewalk parallel to, and to the west of, Unit 105; and 3. At the sidewalk parallel to, at the intersection with the sidewalk to, Unit 103.</p>	<p>Modify cross slopes to comply with ANSI 4.3.7.</p>

WEST OAKS APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Photos	Deficiency	Required Retrofit
11		<p>The parking signs at designated accessible spaces were mounted too low with the bottom of the sign less than 60" above the ground level. This condition was occurred at the following three locations: 1. At the leasing office; 2. At building 2120; and 3. Along Flavion Drive and Ruark Court.</p>	<p>Reinstall parking signs at designated accessible spaces such that the bottom of the sign is 60" above the ground level to comply with ANSI 4.6.2.</p>
12		<p>At building 2100, the ramp to the lower level has severe running slopes without required handrails on both sides.</p>	<p>Install compliant handrails at both sides of the ramp to comply with ANSI 4.8.5.</p>

WEST OAKS APARTMENTS: PUBLIC AND COMMON USE AREAS

Numbers	Photos	Deficiency	Required Retrofit
13		<p>At the Flavion Drive building, the in-line curb ramps have cross slopes greater than 2% maximum at the following two locations: 1. Across from the entry sidewalk to Unit 106; and 2. Across from the entry sidewalk to Unit 101.</p>	<p>Modify curb ramp to comply with ANSI 4.7.2 and 4.8.2.</p>

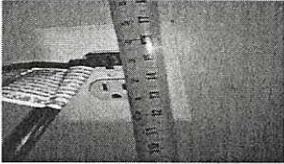
Exhibit 9.3

West Oaks Matrix of Retrofits to Covered Unit Interiors

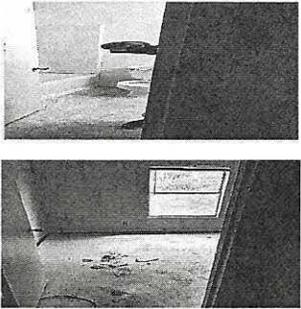
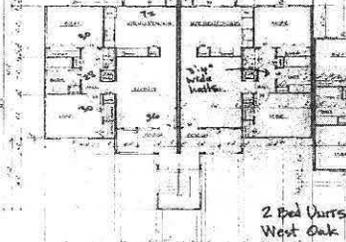
West Oaks Apartments: Covered Unit Interiors

	Inaccessible Features at Covered Dwelling Units		
Numbers	Photos	Deficiency	Required Retrofit
1		Covered dwelling units have inaccessible knob type hardware that requires tight grasping, pinching, and/or turning.	Install accessible lever door hardware at all covered ground floor dwelling units where the existing hardware is knob style to comply with ANSI 4.13.9.
	<p>Required retrofits associated with the below line items shall be performed at 10 first floor units, eight two-bedroom units and two three-bedroom units. The units are as follows: Flavion Drive Building Units 101, 102, 103, 104, 105 and 106; Building 2100, Units 101 and 102; and Building 2117, Units 101 and 102. See Accessible Route Plan.</p>		
2		Thermostats are mounted higher than 48" above finished floor.	Lower thermostats to comply with Requirement 5.

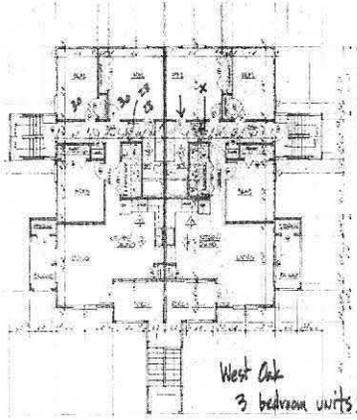
West Oaks Apartments: Covered Unit Interiors

Numbers	Photos	Deficiency	Required Retrofit
3		Sliding door tracks to the patio are higher than 3/4" maximum and not beveled on the interior side.	Provide bevel strips at interior side of sliding door track to comply with Requirement 4(4).
4		Typical outlets are lower than the minimum 15" above the finished floor; measured at 13 1/2".	Raise one outlet per wall in the living room and each bedroom to comply with Requirement 5.
<p>Required retrofits associated with the below line item shall be performed at eight two-bedroom first floor units. See Accessible Route Plan.</p>			

West Oaks Apartments: Covered Unit Interiors

Numbers	Photos	Deficiency	Required Retrofit
5	 	<p>The door clear openings for the bathrooms and Bedrooms 1 and 2 are less than 31 5/8" (minimum 31 5/8" required). See attached plan for measurements.</p>	<p>Widen the bathroom doors and doors to Bedroom 1 and Bedroom 2 to provide 31 5/8" minimum to comply with Requirement 3(2).</p>
	<p>Required retrofits associated with the below line items shall be performed at two three-bedroom first floor units. See Accessible Route Plan.</p>		

West Oaks Apartments: Covered Unit Interiors

Numbers	Photos	Deficiency	Required Retrofit
6	 <p>A detailed floor plan of a 3-bedroom unit. The plan shows three bedrooms, a bathroom, a kitchen, and a living area. Three arrows point to the door clearings in Bedrooms 1, 2, and 3. Handwritten text at the bottom of the plan reads "West Oaks 3 bedroom units".</p>	<p>The door clear openings for Bedrooms 1, 2, and 3 are less than 31 5/8" (minimum 31 5/8" required). See attached plan for measurements.</p>	<p>Widen the doors to Bedrooms 1, 2, and 3 to provide 31 5/8" minimum to comply with Requirement 3(2).</p>
7	<p>See plan in line item #6 for measurements.</p>	<p>The door clear opening for the hall bathroom is less than 31 5/8" (minimum 31 5/8" required).</p>	<p>Widen the hall bathroom door to provide 31 5/8" minimum to comply with Requirement 3(2).</p>
7a	<p>See plan in line item #6 for measurements.</p>	<p>The clear floor space outside of door swing in the hall bathroom is less than 30"x48".</p>	<p>Reverse the swing of door out into the hallway to provide a clear floor space to comply with Requirement 7(2)(b)(i).</p>

West Oaks Apartments: Covered Unit Interiors

Numbers	Photos	Deficiency	Required Retrofit
8	See plan in line item #6 for measurements.		Replace lavatory base cabinet such that lavatory is aligned with the clear floor space. Include removable cabinet that is no less than 30" wide. The removal of the cabinet must provide finished clear knee space centered on the lavatory. Insulate pipes.

Exhibit 10

Notice to Residents of Surveyed Properties

EXHIBIT 10

NOTICE TO RESIDENTS OF SURVEYED PROPERTIES

Dear Resident(s):

This is to advise you that, as a result of a settlement in a lawsuit brought by the United States against the developer of this apartment community alleging, among other things, that the covered dwelling units, the exterior routes, and public and common use areas here at [NAME OF PROPERTY] may not meet the requirements of the federal Fair Housing Act, its guidelines, and the Americans with Disabilities Act, we have agreed to retrofit the ground floor units [ALL UNITS IF ELEVATOR BUILDING] at [NAME OF SURVEYED PROPERTY] to provide greater accessibility for people with disabilities. We have also agreed to retrofit the exterior routes and public and common use areas to provide greater accessibility for persons with disabilities. [IF A TENANT IN A GROUND FLOOR UNIT OR ANY UNIT IN AN ELEVATOR BUILDING INSERT: Your unit will be retrofitted to potentially provide greater accessibility.]

[IF A TENANT IN A GROUND FLOOR UNIT OR ANY UNIT IN AN ELEVATOR BUILDING INSERT: Although your apartment unit will be retrofitted automatically within twenty-four (24) months, we want you to know that you may request to have your apartment modified now at no cost to you. If your temporary relocation for more than twenty-four (24) consecutive hours is required, which is not anticipated, we will pay you \$[AMOUNT,] the equivalent of the United States General Services Administration rate for temporary relocation expenses, prior to the temporary relocation. In scheduling when the repairs will take place, we will take into account your preferences and convenience, to the extent practical.]

[IF A TENANT IN A GROUND FLOOR UNIT OR ANY UNIT IN AN ELEVATOR BUILDING INSERT: You should be aware that this work must be completed within the next twenty-four (24) months, regardless of your intention to stay in your apartment for a longer duration. Please let us know if you are interested in having the work done sooner and we will provide you with additional information.]

Should you have any questions about any of the retrofit work that is being or will be performed, please call us at [NUMBER].

Exhibit 11

Notice to Residents of Unsurveyed Properties

EXHIBIT 11

NOTICE TO RESIDENTS OF UNSURVEYED PROPERTIES

Dear Resident(s):

This is to advise you that, as a result of a settlement in a lawsuit brought by the United States against the developer of this property, alleging, among other things, that the covered dwelling units, the exterior routes, and public and common use areas here at [NAME OF PROPERTY] may not meet the requirements of the federal Fair Housing Act, its guidelines, and the Americans with Disabilities Act, we have agreed to retrofit the ground floor units [ALL UNITS IF ELEVATOR BUILDING] at [NAME OF PROPERTY] to provide greater accessibility for people with disabilities. We have also agreed to retrofit the exterior routes and public and common use areas to provide greater accessibility for persons with disabilities. This notice is being sent, and all retrofits will be made, with permission from the current owner(s) of [NAME OF PROPERTY] and property management. If you are a resident in a ground floor unit [OR ANY UNIT IN AN ELEVATOR BUILDING], your unit will be retrofitted to potentially provide greater accessibility.]

[IF A TENANT IN A GROUND FLOOR UNIT OR ANY UNIT IN AN ELEVATOR BUILDING INSERT: Although your apartment unit will be retrofitted automatically within two and a half (2.5) years from [DATE], we want you to know that you may request to have your apartment modified now at no cost to you. If your relocation for more than twenty-four (24) consecutive hours is required, which is not anticipated, we will pay you \$[AMOUNT,] the equivalent of the United States General Services Administration rate for temporary relocation expenses, prior to the temporary relocation. In scheduling when the repairs will take place, we will take into account your preferences and convenience.]

[IF A TENANT IN A GROUND FLOOR UNIT OR ANY UNIT IN AN ELEVATOR BUILDING INSERT: You should be aware that this work must be completed within two and a half (2.5) years from [DATE] , regardless of your intention to stay in your apartment for a longer duration. Please let us know if you are interested in having the work done now and we will provide you with additional information.]

Should you have any questions about any of the retrofit work that is being or will be performed, please call us at [NUMBER].

Exhibit 12

Notice to Potential Victims of Alleged Discrimination Against Persons with Disabilities at Mills Construction Company, Inc. Apartment Complexes

EXHIBIT 12

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MILLS CONSTRUCTION COMPANY, INC.,)
et al.)
)
Defendants.)
<hr style="border: 0.5px solid black;"/>	

**NOTICE TO POTENTIAL VICTIMS OF ALLEGED DISCRIMINATION AGAINST
PERSONS WITH DISABILITIES AT MILLS CONSTRUCTION COMPANY, INC.
APARTMENT COMPLEXES**

On _____, 2020, the United States District Court for the Eastern District of North Carolina entered a Consent Order resolving a housing discrimination matter initiated by the United States against Mills Construction Company, Inc. and related apartment complex owners involving complexes throughout North Carolina. The United States alleges that certain units and many common use areas (for example, rental offices, routes to amenities, etc.) are not accessible to persons with certain physical disabilities. As part of the consent order, Defendants have agreed to retrofits of the units and common use areas to comply with the Fair Housing Act and the Americans with Disabilities Act at the following apartment complexes:

1. Milburnie Road Apartments, Raleigh, Wake County;
2. Marsh Creek Apartments, Raleigh, Wake County;
3. Hodges Creek Apartments, Raleigh, Wake County;
4. Rollinwood Manor Apartments, Rocky Mount, Edgecombe County;
5. Kittrell Place Apartments, Greenville, Pitt County;
6. Enfield Pointe Apartments, Enfield, Halifax County;
7. Lovett Square Apartments, Durham, Durham County;
8. Sherwood Park Apartments, Durham, Durham County;
9. West Oaks Apartments, Raleigh, Wake County;
10. Best Village I Apartments, Kinston, Lenoir County;
11. Best Village II Apartments, Kinston, Lenoir County;
12. Chapel Ridge Apartments, Roanoke Rapids, Halifax County;
13. Chapel Ridge Manor Apartments, Roanoke Rapids, Halifax County;

14. Chestnut Hills Apartments, Raleigh, Wake County;
15. Dunbar Place Apartments, Asheville, Buncombe County;
16. Emerald Forest Apartments, Biscoe, Montgomery County;
17. Fairview Pointe Apartments, Lillington, Harnett County;
18. Fairview Manor Apartments, Lillington, Harnett County;
19. Filbert's Creek Apartments, Edenton, Chowan County;
20. Firetower Crossing Apartments, Sanford, Lee County;
21. Forest Hill Apartments, Lexington, Davidson County;
22. Lakeside Apartments, Elizabeth City, Pasquotank County;
23. Long Creek Apartments, Dallas, Gaston County;
24. Long Creek II, Dallas, Gaston County;
25. Mocksville Pointe Apartments, Mocksville, Davie County;
26. Myrtle Place Apartments, Goldsboro, Wayne County;
27. Northeast Pointe Apartments, Lumberton, Robeson County;
28. Perry Lane Apartments, Arden, Columbus County;
29. River Run Apartments, Chocowinity, Beaufort County;
30. Sampson Square Apartments, Clinton, Sampson County;
31. Sandhill Manor Apartments, Sanford, Lee County;
32. Sandy Ridge Apartments, Raeford, Hoke County;
33. Savannah Place Apartments, Durham, Durham County;
34. Smith Creek Apartments, Bermuda Run, Davie County;
35. Soco Creek Village Apartments, Cherokee, Swain/Jackson Counties;
36. Tabor Landing Apartments, Tabor City, Columbus County;
37. Willow Oak Run Apartments, Charlotte, Mecklenburg County; and
38. Woodlane Street Apartments, Granite Falls, Caldwell County.

The Consent Order also establishes a process for the compensation of persons who may have been harmed as a result of this alleged discrimination at any of the above-named complexes. You or members of your family may be qualified to recover through this process if you or members of your family believe that you or they:

- were discouraged from living at any of the above-named complexes because of the lack of accessible features of the apartment or the complex;
- rented an apartment but were unable to use, or had difficulties using portions of your apartment or the complex because they were not accessible (including the inability to have visitors who have disabilities);
- paid to have any portion of your apartment or the complex modified to be more accessible;
- were not informed about, or offered, all available apartment units because of your physical disability or the physical disability of someone who would be living with you; or

- requested and were denied a reasonable accommodation for your physical disability or the disability of someone who was living with you.

If you believe you have been harmed because of your physical disability at any of the above-named apartment complexes, or if you have information about someone else who may have been harmed, please contact the United States Department of Justice at: 1-800-XXX-XXXX, ext. XX.

You also may write to: Housing and Civil Enforcement Section, Civil Rights Division, U.S. Department of Justice, 4 Constitution Square, 150 M Street, Northeast, Washington, DC 20002, Attn: DJ 175-54-166.

You must call or write no later than 365 days from [DATE] to be eligible for compensation, and your telephone message or letter must include your name, address, and, if possible, at least two telephone numbers where you may be reached.

[Property Developer]

Exhibit 13

Release of All Claims

EXHIBIT 13

RELEASE OF ALL CLAIMS

In consideration of and contingent upon the payment of the sum of (\$ _____), pursuant to the Consent Order entered in *United States v. Mills Construction Co., Inc., et al.* (E.D.N.C.), by the United States District Court, Eastern District of North Carolina, I hereby release and forever discharge the Defendants named in this action, and their respective affiliates, owners, successors, and assigns from any and all liability for any claims, legal or equitable, I may have against them arising out of the issues alleged in this action as of the date of the entry of that Consent Order. I fully acknowledge and agree that this release of Defendants will be binding on my heirs, representatives, executors, successors, administrators, and assigns. I hereby acknowledge that I have read and understand this release and have executed it voluntarily and with full knowledge of its legal consequences.

SIGNATURE: _____

PRINTED NAME: _____

ADDRESS: _____

DATE: _____

Exhibit 14

Acknowledgement of Receipt of Consent Order

EXHIBIT 14

ACKNOWLEDGMENT OF RECEIPT OF CONSENT ORDER

On [DATE], I received a copy of, and I have read, the Consent Order entered by the federal district court in [CASE NAME AND NUMBER]. I have had all of my questions concerning the Consent Order and the Fair Housing Act answered to my satisfaction.

SIGNATURE: _____

PRINTED NAME: _____

TITLE: _____

DATE: _____

Exhibit 15

Certification of Fair Housing Training

EXHIBIT 15

CERTIFICATION OF FAIR HOUSING TRAINING

On [DATE], I attended training on the federal Fair Housing Act and Americans with Disabilities Act, including its requirements concerning physical accessibility for people with disabilities. I have had all of my questions concerning the Fair Housing Act and Americans with Disabilities Act answered to my satisfaction.

SIGNATURE: _____

PRINTED NAME: _____

TITLE: _____

DATE: _____