

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No.: 15-cv-2705 (JRT/TNL)

UNITED STATES OF AMERICA,)
)
)
 Plaintiff,)
)
 v.)
)
 PAGE EDMUNDS III, and PAGE EDMUNDS)
 LLC d/b/a RENTER’S AVENUE,)
)
 Defendants.)

CONSENT ORDER

On June 10, 2015, the United States initiated this action against Page Edmunds III and Page Edmunds LLC d/b/a Renter’s Avenue (collectively “Defendants”), on behalf of Thomas Lee, his mother Cice Ayang, his half-sister Sonya Ayang, and his minor daughter (collectively “the Lee Family”) pursuant to Section 812(o) of the Fair Housing Act, 42 U.S.C. § 3612(o). This action was brought pursuant to the Fair Housing Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601, *et seq.* (“the Act”). The Complaint alleges that Defendants refused to rent a townhome in Champlin, Minnesota to the Lee Family, due to their race and national origin, in violation of Sections 804(a) and (c) of the Act, 42 U.S.C. §§ 3604(a) and (c). The complaint also alleges that Defendants interfered, coerced or intimidated Thomas Lee in violation of Section 817 of the Act, 42 U.S.C. § 3617.

Defendants filed pleadings denying liability and objecting to the requested relief. The United States of America and Defendants desire to avoid the cost and uncertainty of protracted litigation and agree that this dispute should be resolved without the necessity of further

proceedings or trial. Therefore, the parties waive a hearing and the entry of findings of fact and conclusions of law and agree to the entry of this Consent Order, as indicated by the signatures appearing below.

Therefore, it is hereby ORDERED, ADJUDGED and DECREED as follows:

I. Injunctive Relief

Page Edmunds III and Page Edmunds LLC d/b/a Renter's Avenue, and their agents, employees, successors, and all persons in active concert or participation with them, are hereby enjoined from:

A. Refusing to rent after the making of a bona fide offer , or refusing to negotiate for the rental of, or otherwise making unavailable or denying, a dwelling to any person because of race or national origin, in violation of 42 U.S.C. § 3604(a);

B. Making, printing, or publishing, or causing to be made, printed, or published any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation or discrimination based on race or national origin, or an intention to make any such preference, limitation, or discrimination, in violation of 42 U.S.C. § 3604(c);

C. Coercing, intimidating, threatening, interfering with or retaliating against any person in connection with the exercise or enjoyment of any right granted or protected by the Fair Housing Act, in violation of 42 U.S.C. § 3617.

II. Notification to The United States

On October 27, 2014, the State of Minnesota Commissioner of Commerce revoked Defendant Page Edmunds III's real estate salesperson license. Defendant Page Edmunds III represents to the United States that he does not presently and has no future plans to own, operate, or manage any rental properties in the United States and that Page Edmunds LLC is a defunct

business in the state of Minnesota with no present operations. Defendants must notify the United States within ten (10) days of obtaining an ownership interest in or managing any rental property in the United States. Sections III, IV, and V of this Consent Order shall immediately apply to any rental properties that Defendants obtain an ownership interest in or begin managing after the date of this Consent Order.

III. Mandatory Education and Training

Within ninety (90) days of the notice provided to the United States as set forth in Section II of this Consent Order, Defendants shall attend a program of educational training focusing on the race and national origin related provisions of federal, state and local fair housing laws, regulations and ordinance. The training shall be conducted by a qualified individual or organization that has been previously approved by the Department of Justice, and any expenses associated with this training shall be borne by the Defendants. Defendants shall provide to the United States, within thirty (30) days after training, the name(s) address(es), and telephone number(s) of the trainer(s) and certifications executed by the trainers confirming the attendance of the trainees.

IV. Notification to Public of Nondiscrimination Policies.

Within ten (10) days of the notice provided to the United States as set forth in Section II of this Consent Order, Defendants shall take the following steps to notify the public of their nondiscriminatory policies:

A. Pursuant to 24 C.F.R. Part 110, post and prominently display at any place of business where Defendants conduct rental activity and/or have personal contact with applicants for rental of their property, a Fair Housing Poster.

Include the words “Equal Housing Opportunity” or the fair housing logo in any advertising conducted by Defendants in newspapers, telephone directories, radio, television, Internet or other media, and on all billboards, signs, pamphlets, brochures and other promotional literature. The words or logo should be prominently placed and easily legible.

V. Record Keeping and Monitoring.

A. During the term of this Consent Order, Defendants shall preserve all records pertaining to their obligations under this Consent Order. Upon reasonable notice to Defendants, representatives of the United States Department of Justice shall be permitted to inspect and copy all such records at reasonable times in order to monitor compliance with this Consent Order.

B. During the term of this Consent Order, Defendants shall notify counsel for the United States¹ in writing within fifteen (15) days of receipt of any written or oral complaint against the Defendants, regarding discrimination on the basis of race or national origin, and a description of the resolution of any such complaint within fifteen (15) days of resolution. If the complaint is written, Defendants shall provide a copy of it with the notice; if the complaint is oral, it shall include a written summary of it with the notice. The notice shall include the full details of the complaint, including the complainant’s name, address, and telephone number. Defendants shall also promptly provide the United States with all information it may request concerning any such complaint and its actual or attempted resolution.

VI. Relief for Lee Family.

Within 14 days of the filing of this Consent Order by the Court, Defendants shall pay the total sum of Five Thousand dollars (\$5,000.00), for the purpose of compensating the Lee Family in settlement of the case. Defendants shall deliver this payment to counsel for the United States

¹ All documents or other communications required by this Order to be sent to the counsel for the United States shall be addressed as follows: Bahram Samie, Assistant United States Attorney, United States Attorney’s Office, 600 U.S. Courthouse, 300 South Fourth Street, Minneapolis, MN 55415.

in the form of cashier's checks payable to the members of the Lee family in the manners and amounts listed in **Appendix A**. The United States shall disburse the checks to the members of the Lee Family after Thomas Lee, Cice Ayang, and Sonya Ayang execute written releases regarding the claims asserted in this lawsuit. Copies of the Releases are attached as **Appendix B, Appendix C and Appendix D**. The United States shall provide scanned copies of the executed releases to Defendants by email at: pagevilnius@gmail.com

VII. Court Jurisdiction, Scope and Term of Consent Order.

A. The parties have consented to the entry of this Consent Order as indicated by the signatures below. To this end, the parties stipulate and the Court finds that this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1345 and 42 U.S.C. § 3612(o).

B. This Consent Order is effective immediately upon its entry by the Court.

C. The entry of this Consent Order will terminate this case. The Court will retain jurisdiction, in order to enforce the terms of the Consent Order, for a period of three years after the entry of this Consent Order.

D. The United States may move the Court to extend the duration of the Order if it determines that Defendants have violated one or more terms of the Order or if the interests of justice otherwise require.

E. The United States and Defendants shall endeavor in good faith to resolve informally any differences regarding interpretation of and compliance with this Order prior to bringing such matters to the Court for resolution. However, in the event of a failure by Defendants, whether willful or otherwise, to perform in a timely manner any act required by this Consent Order or otherwise to act in violation of any provision thereof, the United States may

move this Court to impose any remedy authorized by law or equity, including, but not limited to, an order requiring performance of such act or deeming such act to have been performed, and an award of any damages, costs, and attorneys' fees which may have been occasioned by Defendants' violation or failure to perform.

F. The parties agree that in the event Defendants engage in any future violation of the Fair Housing Act, such violation will constitute a "subsequent violation" pursuant to 42 U.S.C. § 3614(d)(1)(C).

G. Each party to this Consent Order shall bear its own costs and attorney's fees associated with this action.

H. This Consent Order may be signed by the parties in counterparts.

Dated February 15, 2017

For Plaintiff United States of America:

ANDREW M. LUGER
United States Attorney

/s/Bahram Samie
BAHRAM SAMIE (#392645)
Assistant United States Attorney
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55419
Tel: (612) 664-5600
Fax: (612) 664-5788
E-mail: Bahram.Samie@usdoj.gov

Dated February 15, 2017

For Defendants Page Edmunds LLC

/s/Page Edmunds aka Page Edmunds III
By: Page Edmunds III
Its Owner and Primary Member

Dated February 15, 2017

/s/Page Edmunds aka Page Edmunds III
PAGE EDMUNDS III
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Gineitiskiu km
Buivydiskiu ap-ke
Vilniaus r. 14159
Lithuania

SO ORDERED THIS 23rd DAY OF February, 2017.

s/John R. Tunheim

JOHN R. TUNHEIM
CHIEF JUDGE
UNITED STATES DISTRICT COURT

APPENDIX A

Payment Schedule

Pursuant to Section V of the Consent Order, Defendants must deliver to counsel for the United States separate cashier's checks issued to the following individuals in the specified amounts:

Thomas Lee	\$2,500.00
Cice Ayang	\$1,250.00
Sonya Ayang	\$1,250.00

APPENDIX B

Release

In consideration of the payment of the sum of two thousand five hundred dollars (\$2,500.00), pursuant to the Consent Order entered in the United States v. Page Edmunds III, et al., Civil No. 15-cv-02705 (JRT/TNL) (D. Minn.), I, Thomas Lee, individually and as custodial parent and guardian of my minor daughter, (initials) J.L., hereby release Page Edmunds III and Page Edmunds LLC d/b/a Renter's Avenue from any and all liability for any claims, legal or equitable, I may have against them arising out of the issues alleged in the action as of the date of the entry of the Consent Order. I fully acknowledge and agree that this release shall 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.

Executed this ____ day of _____, 2017.

[Printed Name]

[Signature]

APPENDIX C

Release

In consideration of the payment of the sum of one thousand two hundred and fifty dollars (\$1,250.00), pursuant to the Consent Order entered in the United States v. Page Edmunds III, et al., Civil No. 15-cv-02705 (JRT/TNL) (D. Minn.), I, Cice Ayang, hereby release Page Edmunds III and Page Edmunds LLC d/b/a Renter's Avenue from any and all liability for any claims, legal or equitable, I may have against them arising out of the issues alleged in the action as of the date of the entry of the Consent Order. I fully acknowledge and agree that this release shall 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.

Executed this ____ day of _____, 2017.

[Printed Name]

[Signature]

APPENDIX D

Release

In consideration of the payment of the sum of one thousand two hundred and fifty dollars (\$1,250.00), pursuant to the Consent Order entered in the United States v. Page Edmunds III, et al., Civil No. 15-cv-02705 (JRT/TNL) (D. Minn.), I, Sonya Ayang, hereby release Page Edmunds III and Page Edmunds LLC d/b/a Renter's Avenue from any and all liability for any claims, legal or equitable, I may have against them arising out of the issues alleged in the action as of the date of the entry of the Consent Order. I fully acknowledge and agree that this release shall 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.

Executed this ____ day of _____, 2017.

[Printed Name]

[Signature]