

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

UNITED STATES OF AMERICA,)
)
) Plaintiff,)
)
) v.)
)
) HERBERT BOLT, HERBERT BOLT, JR.,)
) and BETTY BOLT)
)
) Defendants.)
)
)
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)
)
)
)

Civil Action No. **CV207-118**

CONSENT DECREE

I. INTRODUCTION

A. Background

1. This Consent Decree is entered between the United States of America, Defendant Herbert Bolt, Herbert Bolt, Jr., and Betty Bolt (referred to herein as "Defendants").
2. This action is brought to enforce the provisions of the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 ("Fair Housing Act" or "the Act"), 42 U.S.C. §§ 3601 et seq. The United States alleges that Herbert Bolt and Herbert Bolt, Jr. own and operate Hickory Plantation Apartments and that Herbert Bolt and Betty Bolt both act as rental managers of Hickory Plantation Apartments. The United States alleges that the Defendants refused to make reasonable accommodations for persons with disabilities in violation of Section 804(f)(1)-(f)(3)(B) of the Act. See 42 U.S.C. § 3604(f)(1)-(3)(B). The United States further alleges that the Defendants made, printed, or published a notice or statement with respect to the rental of a dwelling that

indicated a preference, limitation, or discrimination based on handicap, in violation Section 804(c) of the Act. See 42 U.S.C. § 3604(c).

3. The Defendants have a policy of refusing to allow residents at the Hickory Plantation Apartments to keep dogs.
4. In November 2006 and January 2007, the United States Department of Justice conducted a series of tests to evaluate the Defendants' compliance with the Fair Housing Act. The testing undertaken by the United States revealed that the Defendants are engaged in housing practices that discriminate on the basis of disability at the Hickory Plantation Apartments, including refusing to make reasonable accommodations in the Defendants' no-dog policy when such accommodations may be necessary to afford a person with a handicap, such as persons who require the assistance of guide dogs, equal opportunity to use and enjoy a dwelling.
5. The United States and the Defendants (hereinafter, "the Parties") agree that the Hickory Plantation Apartments is a "dwelling" within the meaning of 42 U.S.C. § 3602(b).

B. Defendants

6. Defendants Herbert Bolt and Herbert Bolt, Jr. own the Hickory Plantation Apartments as a sole proprietorship. The apartment complex is located at 900 Dilworth Street in Camden County, St. Mary's, Georgia, and consists of several two-level apartment buildings with 100 two-bedroom / one-bath units.
7. Defendants Herbert Bolt and Betty Bolt both act as rental managers of Hickory Plantation Apartments. At all times relevant to the United States' complaint, Defendants Herbert

and Betty Bolt participated in and were responsible for the management and operation of Hickory Plantation Apartments.

C. Consent of the Parties to Entry of this Decree

8. The Parties agree that this Court has jurisdiction over the subject matter of this case pursuant to 28 U.S.C. § 1345 and 42 U.S.C. § 3614(a). The Parties further agree that the instant controversy should be resolved without further proceedings and without an evidentiary hearing.
9. The Parties agree that this Consent Decree shall apply to and govern all properties currently owned or managed in whole or in part by the Defendants, including but not limited to Hickory Plantation Apartments and Willow Way Apartments, and any properties the Defendants may acquire, own, or manage, in whole or in part, during the term of this Decree (hereinafter "Subject Properties").
10. As indicated by the signatures appearing below, the Parties agree to entry of this Consent Decree.

It is hereby ADJUDGED, ORDERED and DECREED:

II. GENERAL INJUNCTION

11. The Defendants, their agents, employees, and all other persons in active concert or participation with them, are enjoined from:
 - (a) discriminating in the sale or rental, or from otherwise making unavailable or denying a dwelling to any buyer or renter because of a handicap as prohibited by the Fair Housing Act, 42 U.S.C. § 3604(f)(1);

- (b) discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection with such dwelling, because of a handicap as prohibited by the Fair Housing Act, 42 U.S.C. § 3604(f)(2);
- (c) refusing to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling as required by the Fair Housing Act, 42 U.S.C. § 3604(f)(3)(B); and
- (d) making, printing, or publishing a notice or statement with respect to the rental of a dwelling that indicates a preference, limitation, or discrimination based on handicap, in violation of 42 U.S.C. § 3604(c).

III. REASONABLE ACCOMMODATION POLICY

12. Within sixty (60) days after the date of entry of this Decree, and subject to approval by the United States, the Defendants shall adopt and implement specific, uniform, and objective written standards and procedures for receiving and handling requests made by people with disabilities for reasonable accommodations. These standards shall comply with the requirements of 42 U.S.C. §§ 3601 *et seq.*, and include the following provisions:
- (a) The Defendants shall inform all applicants and occupants of the Subject Properties that they may request reasonable accommodations of the Defendants' rules, policies, practices, and services. Prior to lease execution, if prospective tenants inquire about reasonable accommodations, the Defendants will inform them of their ability to seek reasonable accommodations.

- (b) The Defendants shall use the following forms: Request for Reasonable Accommodation ("Request Form") (Appendices A and B); and Approval or Denial of Reasonable Accommodation Request Form ("Approval Form") (Appendix C). Oral requests for Reasonable Accommodations will be recorded by the Property Manager using the form in Appendix B.
 - (c) The Defendants shall keep written records of each request for reasonable accommodation it receives during the duration of this Consent Decree. These records shall include: (a) the name, address, and telephone number of the person making the request; (b) the date on which the request was received; (c) the nature of the request; (d) whether the request was granted or denied; and (e) if the request was denied, the reason(s) for the denial.
 - (d) Upon adopting specific, uniform, and objective written standards and procedures for receiving and handling requests made by people with disabilities for reasonable accommodations, the Defendants shall provide written notice, in a form substantially equivalent to Appendix D attached hereto, of those standards to each current and future tenant of the Subject Properties.
 - (e) The Defendants shall post the Reasonable Accommodation Policy by which a tenant may request a reasonable accommodation in the leasing office in a conspicuous location, easily viewable to tenants and prospective tenants.
13. If the Defendants propose to change these standards and procedures, they shall first notify the United States and provide a copy of the proposed changes. If the United States does not deliver written objections to the Defendants within 60 days after receiving the

proposed changes, the changes may be effected. If the United States makes any objections to the proposed changes within the 60-day period, the specific changes to which the United States objects shall not be effected until the objections are resolved.

IV. COMPENSATION OF AGGRIEVED PERSONS

14. Within 45 days of the entry of this Decree, the Defendants shall deposit in an interest-bearing escrow account the total sum of \$35,000 for the purpose of compensating any aggrieved persons who may have suffered as a result of the Defendants' failure to make reasonable accommodations for persons with disabilities in compliance with the Fair Housing Act. This money shall be referred to as "the Settlement Fund."
15. Any interest accruing to the Settlement Fund shall become a part of the Settlement Fund and be utilized as set forth in this document.
16. Within 15 days of the entry of this Decree, the Defendants shall publish the Notice to Potential Victims of Housing Discrimination ("Notice") at Appendix E informing readers of the availability of compensatory funds. The Notice shall be no smaller than three columns by six inches and shall be published on three occasions in The Brunswick News and the Tribune & Georgian for a total of six publications. The publication dates shall be separated from one another by at least 21 days, and at least two of the publication dates shall be a Saturday for the Brunswick News and a Friday for the Tribune & Georgian. The final publication date shall be no later than 75 days from the entry of this Decree. Within 10 days of the final publication date, the Defendants shall provide copies of the pages from the newspaper containing the Notice to counsel for the United States.

17. Within 15 days of the entry of this Decree, the Defendants shall send a copy of the Notice to Potential Victims of Housing Discrimination to the Georgia Council of the Blind, 850 Dogwood Road, Suite A-400-604, Lawrenceville, GA 30044, (877) 667-6815; the American Foundation for the Blind in Atlanta (AFB – Atlanta), 100 Peachtree Street, Suite 620, Atlanta, GA 30303, (404) 525-2303; and Georgia Guide Dog Users, 125 Willow Pond Way, Brunswick, GA 31525, (912) 261-9833. The Defendants shall provide proof of mailing to counsel for the United States.
18. The United States shall investigate the claims of allegedly aggrieved persons and, within 180 days from the entry of this Decree, shall make a preliminary determination of which persons are aggrieved and an appropriate amount of damages that should be paid to each such person. The United States will inform the Defendants in writing of its preliminary determinations, together with a copy of a sworn declaration from each aggrieved person setting forth the factual basis of the claim. The Defendants shall have 14 days to review each declaration and provide to the United States any documents or information that they believe may refute the claim.
19. After receiving the Defendants' comments, the United States shall submit its final recommendations to the Court for approval, together with a copy of the declarations and any additional information submitted by the Defendants. When the Court issues an order approving or changing the United States' proposed distribution of funds for aggrieved persons, the Defendants shall, within 10 days of the Court's order, deliver to the United States checks payable to the aggrieved persons in the amounts approved by the Court. In no event shall the aggregate of all such checks exceed the sum of the Settlement Fund,

including accrued interest. No aggrieved person shall be paid until he/she has executed and delivered to counsel for the United States the release at Appendix F.

20. After the satisfaction of paragraphs 14–19, above, and the corresponding time periods have expired, any money remaining in the Settlement Fund shall be released to the Defendants.
21. The Defendants shall permit the United States, upon reasonable notice, to review any records that may facilitate its determinations regarding the claims of allegedly aggrieved persons.
22. Nothing in this section shall preclude the United States from making its own efforts to locate and provide notice to potential aggrieved persons.

V. EDUCATIONAL PROGRAM

23. Within 30 days of the entry of this Decree, the Defendants shall provide a copy of this Decree to all agents and supervisory employees at all of the Subject Properties involved in the rental, management, or operation of dwelling units and secure a signed statement from each agent or employee acknowledging that he or she has received and read the Decree, and has had an opportunity to have questions about the Decree answered. This statement shall be substantially in the form of Appendix G.
24. During the term of this Decree, within 30 days after the date he or she commences an agency or employment relationship with the Defendants, each new agent or supervisory employee involved in the rental, management, or operation of any Subject Property shall be given a copy of this Decree and be required to sign the statement acknowledging that he or she has received and read the Decree, and had an opportunity to have questions

about the Decree answered. This statement shall be substantially in the form of Appendix G.

25. Within 90 days of the date of entry of this Consent Decree, the Defendants and all employees and agents whose duties, in whole or in part, involve supervisory authority over the rental, management, or operation of the Subject Properties shall undergo training on the requirements of the Fair Housing Act. The training shall be conducted by a qualified third-party, who is unconnected to the Defendants or their employees, agents or counsel, and approved by the United States. All expenses associated with this training shall be borne by the Defendants. The Defendants shall provide to the United States, within thirty 30 days after the training, the name(s), addresses(es) and telephone number(s) of the trainer(s); copies of the training outlines and any materials distributed by the trainers; and certifications executed by each Defendant and covered employees and agents confirming their attendance, in a form substantially equivalent to Appendix H.¹

VI. COMPLIANCE TESTING

26. The United States may take steps to monitor the Defendants' compliance with this Decree including, but not limited to, conducting fair housing tests at any dwelling in which any Defendant, now or in the future, has a direct or indirect ownership, management, or financial interest.

¹ For purposes of this Decree, all submissions to the United States or its counsel should be submitted via facsimile, 202-514-1116, and via **overnight delivery**, to: Chief, Housing and Civil Enforcement Section, Civil Rights Division, United States Department of Justice, 1800 G Street, N.W., Washington, DC 20006, Attn: DJ# 175-20-109, or as otherwise directed by the United States. For documents exceeding 30 pages, the first 30 pages shall be sent via facsimile and the complete document shall be sent via overnight service.

VII. NOTICE OF DEFENDANTS' NON-DISCRIMINATION POLICY

27. For the duration of this Consent Decree, in all future advertising in newspapers, and on pamphlets, brochures and other promotional literature regarding the Hickory Plantation Apartments and any additional rental dwellings that the Defendants may acquire, manage, or operate, they shall place, in a conspicuous location, the federal Fair Housing Poster, no smaller than 10 by 14 inches, as described by 24 C.F.R. 110.15 and 110.25, indicating that all dwellings are available for rental on a non-discriminatory basis.
28. For the duration of this Consent Decree, in all future advertising in newspapers where the advertisement is more than 2 square inches, on pamphlets, brochures and other promotional literature, and on any internet website regarding Hickory Plantation or any multifamily rental dwellings that the Defendants may acquire, manage, or operate, the Defendants shall place, in a conspicuous location, a statement that the dwelling units are available for rental on a non-discriminatory basis.

VIII. NOTIFICATION AND DOCUMENT RETENTION REQUIREMENTS

29. Within 60 days after the entry of this Decree, the Defendants shall submit an initial report containing the signed statement verifications of attendance for the Defendants, employees, and agents who have completed the education training program specified in Section V of this Consent Decree. Thereafter, during the term of this Decree, the Defendants shall, one (1) year after its entry and each year thereafter, submit to the United States a report containing the signed statements of new employees and agents verifying that, in accordance with paragraphs 23–24 of this Decree, they have received and read the

Decree and had an opportunity to have questions about the Decree answered, except that the last report shall be submitted 60 days before the expiration of this Decree.

30. For duration of this Decree, the Defendants are required to preserve all records related to this Consent Decree. Upon reasonable notice to the Defendants, representatives of the United States shall be permitted to inspect and copy any such records or to inspect any developments or residential units under their control bearing on compliance with this Consent Decree at any and all reasonable times, provided, however, that the United States shall endeavor to minimize any inconvenience to the Defendants from such inspections.
31. For the duration of this Decree, the Defendants shall advise counsel for the United States in writing within 15 days of receipt of any formal or informal complaint against them, their employees or agents, regarding housing discrimination on the basis of disability under the Act. The Defendants shall also promptly provide the United States all information that the United States may request concerning any such complaint. Within 15 days of the resolution of any such complaints, the Defendants shall advise counsel of the United States of such resolution.

IX. CIVIL PENALTY

32. Defendants Herbert Bolt, Herbert Bolt, Jr., and Betty Bolt, will pay to the United States a civil penalty pursuant to 42 U.S.C. § 3614(d)(1)(C) in the amount of \$20,000. Within ten (10) days after the entry of this Consent Decree, Defendants shall pay the sum of ten thousand dollars (\$10,000.00) to the United States, and within forty-five (45) days after the entry of the Consent Decree, Defendants shall pay the remaining ten thousand dollars

(\$10,000.00) to the United States. These payments shall be delivered to counsel for the United States in the form of a check payable to the "United States of America."

X. DURATION OF DECREE AND TERMINATION OF LEGAL ACTION

33. This Consent Decree shall remain in effect for 3 years after the date of its entry. By consenting to entry of this Decree, the United States and the Defendants agree that in the event any Defendant engages in any future violation(s) of the Fair Housing Act, such violation(s) shall constitute a "subsequent violation" by that Defendant pursuant to 42 U.S.C. § 3614(d)(1)(C)(ii).
34. The Court shall retain jurisdiction for the duration of this Consent Decree to enforce the terms of the Decree, after which time the case shall be dismissed with prejudice. The United States may move the Court to extend the duration of the Decree in the interests of justice.
35. The Parties shall endeavor in good faith to resolve informally any differences regarding interpretation of and compliance with this Decree prior to bringing such matters to the Court for resolution. However, in the event of a failure by any Defendant to perform in a timely manner any act required by this Decree or otherwise to act in conformance with 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 reasonable attorneys' fees which may have been occasioned by the violation or failure to perform.

XI. TIME FOR PERFORMANCE

36. Any time limits for performance imposed by this Consent Decree may be extended by the mutual written agreement of the United States and the relevant Defendants.

XII. COSTS OF LITIGATION

37. Each party to this litigation will bear its own costs and attorneys' fees associated with this litigation.

XIII. COUNTERPARTS


38. This Consent Decree may be executed in one or more counterparts, each of which shall be deemed an original, and all of which together shall constitute the same instrument.

ENTERED and ORDERED this _____ day of _____, 2007.

UNITED STATES DISTRICT COURT JUDGE

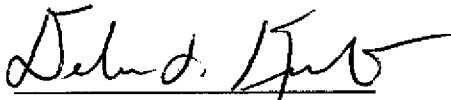
For the United States:

Dated: Sept. 27, 2007

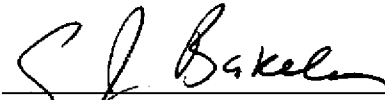


EDMUND A. BOOTH, JR.
Georgia Bar # 068000
United States Attorney
Southern District of Georgia

RENA J. COMISAC
Acting Assistant Attorney General



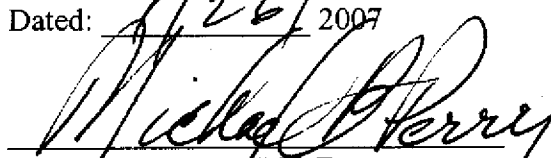
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Civil Rights Division
Housing and Civil Enforcement Section
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Northwestern Building, 7th Floor
Washington, DC 20530
Tel: (202) 514-0553; Fax: (202) 514-1116

*For Defendants Herbert Bolt,
Herbert Bolt, Jr., and Betty Bolt*

Dated: 9/26/ 2007



MICHAEL B. BERRY, Esq.
102-B Martha Drive
St. Mary's, GA 31558
Tel: (912) 882-5000; Fax: (912) 882-9023

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) Civil Action No.
)
 HERBERT BOLT, HERBERT BOLT, JR.,)
 and BETTY BOLT)
)
 Defendants.)
)
 _____)

APPENDIX A

REQUEST FOR REASONABLE ACCOMMODATION

If you, a member of your household, or someone associated with you has a disability, and feel that there is a need for a reasonable accommodation for that person to fully enjoy the premises and/or to have equal opportunity to use and enjoy a dwelling unit or the public or common use areas, please complete this form and return it to your Apartment Manager. Check all items that apply and explain fully. The Apartment Manager will assist you in completing this form, and will answer this request in writing within two weeks (or sooner if the situation requires an immediate response).

Name of Tenant or Applicant: _____

Today's Date: _____

Signature of Tenant or Applicant: _____

1. The person(s) who have a disability requiring a reasonable accommodation is:

Me A person associated or living with me.

Name of person with disability: _____

Phone #: _____

Address: _____

2. I am requesting the following changes so that I and persons associated or living with me can live here with equal opportunity to use and enjoy the premises (check all of the changes that apply):

A change in a rule, policy, or practices.

I need the following change:

Other:

3. I need this reasonable accommodation because:

REQUESTER

DATE

APARTMENT MANAGER

DATE

IN THE UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,)	
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Plaintiff,)	
)	
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HERBERT BOLT, HERBERT BOLT, JR.,)	
and BETTY BOLT)	
)	
Defendants.)	
)	
_____)	

APPENDIX B

Form to be completed by Apartment Manager if Requester cannot or will not complete written form:

On _____, the undersigned requester orally requested a reasonable accommodation to [describe dwelling unit]:

The reasonable accommodation consisted of:

I, the undersigned, Apartment Manager of _____:
(Apartment Complex)

_____ Gave the requester the applicable forms and offered to assist in filling out the forms.

_____ Granted the request.

_____ Explained the request could not be evaluated until the following additional information is provided:

REQUESTER

DATE

REQUESTER'S ADDRESS: _____

REQUESTER'S TELEPHONE NUMBER: _____

APARTMENT MANAGER

DATE

IN THE UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,)
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)
 Defendants.)
)
 _____)

APPENDIX C

APPROVAL OR DENIAL OF REASONABLE ACCOMMODATION REQUEST

Dear: _____:

Address: _____

Phone: () _____

On _____ [date], you requested the following reasonable accommodation [describe request]:

We have (check all that apply):

Approved your request. The following reasonable accommodation will be permitted [describe]: _____

The change is effected immediately.

The reasonable accommodation will be permitted by:
[date] _____.

To make the change you requested, we must have bids and then arrange installation or we must order certain equipment. We anticipate that the change will be made by [date]: _____, and we will notify you if we discover that there will be a delay. If you have questions, or think that this accommodation will not meet your needs or will take too long to provide, you may file a complaint with the Department of Housing and Urban Development's

Atlanta Regional Office of FHEO at Five Points Plaza, 40 Marietta Street, 16th Floor, Atlanta, GA, 30303; Telephone: (404) 331-5140 or (800) 440-8091.

Can neither approve nor deny your request without further information [List information needed]:

Denied your request. We have denied your request because [list all reasons that apply]:

We used these facts to deny your request [list]:

To make this decision, we spoke with the following people, reviewed the following documents, and performed the following investigation [list]:

If you disagree with this decision you may contact the Department of Housing and Urban Development (404) 331-5140 or (800) 440-8091 to discuss this matter further.

Sincerely,

Signature: _____ Date: _____
Name: _____ Title: _____

Requestor acknowledges receipt of this completed form:

Signature: _____ Date: _____

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 Defendants.)
)
 _____)

APPENDIX D

REASONABLE ACCOMMODATION POLICY FOR PERSONS WITH DISABILITIES

If a resident or member of a household has a disability, he/she may request a reasonable accommodation. Reasonable accommodations in rules, policies, practices or services may be made when such reasonable accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.

It is preferred that all reasonable accommodation requests be submitted in writing to the Apartment Manager. Requests for reasonable accommodation and release forms are available at the rental office. If a resident or household member has difficulty filling in the form, the Apartment Manager will assist him or her in completing the form. Oral requests for reasonable accommodations will be recorded and processed in accordance with this policy.

All requesters shall be notified in writing of the decision regarding the request within 14 days of the Apartment Manager's receipt of the complete written request, including completed Attachments A, B and C, if necessary. If the request is denied, an explanation for such denial shall be included in the written notification. If the request is denied, the requesting resident may contact the Department of Housing and Urban Development to file a complaint at:

Department of Housing and Urban Development's Atlanta Regional Office of
FHEO at Five Points Plaza, 40 Marietta Street, 16th Floor, Atlanta, GA, 30303;
Telephone: (404) 331-5140 or (800) 440-8091.

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APPENDIX E

NOTICE TO POTENTIAL VICTIMS OF HOUSING DISCRIMINATION

On _____, 2007, the United States District Court for the Southern District of Georgia entered a Consent Decree resolving a housing discrimination lawsuit brought by the United States against the owners and managers of the Hickory Plantation Apartments and Willow Way Apartments. The lawsuit alleges that the owners and managers of Hickory Plantation and Willow Way have refused to make reasonable accommodations in their no-dog policy when such accommodations may be necessary to afford a person with a handicap equal opportunity to use and enjoy a dwelling.

The Consent Decree also establishes a Settlement Fund to compensate persons who have been harmed as a result of this discrimination at Hickory Plantation Apartments or Willow Way Apartments. You or members of your family may be qualified to recover from the Settlement Fund if you or members of your family:

- were discouraged from living at Hickory Plantation or Willow Way because of a refusal to make a reasonable accommodation in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling;
- were discouraged from living at Hickory Plantation or Willow Way because of a disability or the disability of someone living with you;
- requested and were denied a reasonable accommodation for your disability or the disability of someone who was living with you.

If you believe you have been harmed because of your disability at Hickory Plantation or Willow Way, or if you have information about someone else who may have been harmed, please contact the United States Department of Justice at:

1-800-896-7743

leave message in mailbox X

You may also write to:

United States Department of Justice

Civil Rights Division

Housing and Civil Enforcement Section

950 Pennsylvania Ave. N.W. -G St

Washington, DC 20530

You must call or write on or before [no more than 90 days after _____, 2007,] and your message or letter must include your name, address, and, if possible, at least TWO telephone numbers where you may be reached.

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Defendants.)	
)	
)	
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APPENDIX F

FULL AND FINAL RELEASE OF CLAIMS

I, _____, on behalf of myself and family members, agents, heirs, executors, administrators, successors and assigns, pursuant to the terms, provisions, and conditions of the Consent Decree approved by the United States District Court for the Southern District of Georgia on _____, 2007 in the case of United States v. Herbert Bolt, et al., (“lawsuit”) and in consideration of the payment of _____ do fully, finally and forever release, discharge, and hold harmless Herbert Bolt, Herbert Bolt, Jr., and Betty Bolt (hereinafter “Defendants”), along with their insurers, attorneys, related companies, principals, predecessors, successors, assigns, affiliates, partners, directors, officers, agents, employers, shareholders, subsidiaries, employees, former employees, heirs, executors, and administrators and any persons acting under their respective direction or control (hereinafter “Releasees”), from any and all fair housing claims set forth, or which could have been set forth, in the Complaint in this lawsuit that I may have against Defendants or any of the Releasees for any of Defendants’ actions or statements related to those claims through the date of this Consent Decree, including claims for damages (both compensatory and punitive), costs, fines and attorneys’ fees.

I affirm that the only consideration for signing this Full and Final Release of Claims are the terms stated in the Consent Decree signed by the parties, and the monetary payment referenced above. I have accepted the terms of this Release and the Consent Decree because I believe them to be a fair and reasonable settlement and for no other reason. This Release and the Consent Decree contain and constitute the entire understanding and agreement between the parties.

Print Name:

SIGNATURE

DATE

IN THE UNITED STATES DISTRICT COURT
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Civil Action No.

APPENDIX G

CERTIFICATION OF RECEIPT OF CONSENT DECREE

I have received a copy of the Consent Decree entered in of United States v. Herbert Bolt, et al. This Consent Decree was explained to me by my employer and all my questions were answered concerning it. I have read and understand the Consent Decree.

(Signature)

(Print name)

(Date)

IN THE UNITED STATES DISTRICT COURT
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Defendants.)
_____)

Civil Action No.

APPENDIX H

CERTIFICATION OF FAIR HOUSING TRAINING

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

(Signature)

(Print name)

(Date)