

**PREDETERMINATION SETTLEMENT AGREEMENT**

CP# 06-17-70594  
HUD# 07-17-6987-8

**PARTIES TO THE SETTLEMENT AGREEMENT**

**RESPONDENTS**

SCOTT G. FREEMAN  
800 Timber CT  
Coralville, Iowa 52241

SUSAN K. FREEMAN  
800 Timber CT  
Coralville, Iowa 52241

**COMPLAINANT**

ARIANNA ARON

and

IOWA CIVIL RIGHTS COMMISSION  
400 East 14th Street  
Des Moines, Iowa 50319

**Description of the Parties:** Complainant alleges discrimination in the area of housing. Complainant alleges Respondents refused to rent to her due to race and familial status. Respondents own or manage the subject property, a two-bedroom condominium located at 464 North Dubuque Street, Apartment E, North Liberty, Iowa 52317.

A complaint having been filed by Complainant against Respondents with the Commission under Iowa Code Chapter 216 and there having been a preliminary inquiry, the parties do hereby agree and settle the above-captioned matter in the following extent and manner:

## **Acknowledgment of Fair Housing Laws**

1. Respondents agree there shall be no discrimination, harassment, or retaliation of any kind against Complainant or any other person for filing a charge under the “Iowa Civil Rights Act of 1965” (ICRA); or because of giving testimony or assistance, or participating in any manner in any investigation, proceeding or hearing under the ICRA; or because of lawful opposition to any practice forbidden by the ICRA. Iowa Code § 216.11(2).
2. Respondents acknowledge the ICRA makes it unlawful to discriminate in the terms, conditions or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection with the dwelling because of race, color, creed, sex, sexual orientation, gender identity, national origin, religion, disability, or familial status. Iowa Code § 216.8(1)(b).

Respondents acknowledge the Fair Housing Act (FHA) makes it unlawful to refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin.. 42 U.S.C. 3604(a) (§ 804(a) of the Fair Housing Act).

## **Voluntary and Full Settlement**

3. The parties acknowledge this Predetermination Settlement Agreement is a voluntary and full settlement of the disputed complaint. The parties affirm they have read and fully understand the terms set forth herein. No party has been coerced, intimidated, threatened or in any way forced to become a party to this Agreement.
4. The parties enter into this Agreement in a good faith effort to amicably resolve existing disputes. The execution of this Agreement is not an admission of any wrongdoing or violation of law. Nor is the execution of this Agreement an admission by Complainant that any claims asserted in her complaint are not fully meritorious.
5. The parties agree the execution of this Agreement may be accomplished by separate counterpart executions of this Agreement. The parties agree the original executed signature pages will be attached to the body of this Agreement to constitute one document.
6. Respondents agree the Commission may review compliance with this Agreement. And as part of such review, Respondents agree the Commission may examine witnesses, collect documents, or require written reports, all of which will be conducted in a reasonable manner by the Commission.

## **Disclosure**

7. Because, pursuant to Iowa Code §216.15A(2)(d), the Commission has not determined that disclosure is not necessary to further the purposes of the ICRA relating to unfair or discriminatory practices in housing or real estate, this Agreement is a public record and subject to public disclosure in accordance with Iowa’s Public Records Law, Iowa Code Chapter 22. See Iowa Code §22.13.

## **Release**

8. Complainant hereby waives, releases, and covenants not to sue Respondents with respect to any matters which were, or might have been alleged as charges filed with the Iowa Civil Rights Commission, the Office of Fair Housing and Equal Opportunity, Department of Housing and Urban Development, or any other anti-discrimination agency, subject to performance by Respondents of the promises and representations contained herein. Complainant agrees any complaint filed with any other anti-discrimination agency, including the Office of Fair Housing and Equal Opportunity, Department of Housing and Urban Development, which involves the issues in this complaint, shall be closed as Satisfactorily Adjusted.

## **Fair Housing Training**

9. Scott Freeman and each of Respondents' current employees or agents who are involved in the management or operation of residential rental properties will receive training on the requirements of State and Federal Fair Housing Laws within 90 days of their receipt of a Closing Letter from the Commission. The training will include an overview of fair housing law and will emphasize the law regarding the prohibitions discriminatory statements and refusal to rent due to race and familial status. The training shall be conducted by a qualified person, approved by the Commission or the U.S. Department of Housing and Urban Development.

Respondents also agree to send documentation to the Commission verifying the fair housing training has been completed within ten (10) days of completing the training.

## **Relief for Complainant**

10. Within ten days of the date on the Commission's Closing Letter, Respondents agree to pay Complainant \$500.00 without any deductions. Respondents agree the Settlement Check will be made out to Complainant and mailed to Natalie Burnham, Iowa Civil Rights Commission, Grimes State Office Building, 400 East 14<sup>th</sup> Street, Room 201, Des Moines, Iowa 50319. Ms. Burnham will send the settlement check to Complainant via certified mail.

## **Reporting and Record-Keeping**

11. Respondents agree to send documentation to the Commission of objective evidence of the successful completion of fair housing training in the form of a Certificate or a letter from the entity conducting the training within ten (10) days of the completion of the training, as evidence of compliance with Term 9 of this Agreement.

All required documentation of compliance must be submitted via email or U.S. Mail to:

Natalie Burnham  
Iowa Civil Rights Commission, Grimes State Office Building  
400 East 14th Street, Des Moines, Iowa 50319

Natalie.Burnham@iowa.gov

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Scott G. Freeman, RESPONDENT

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Date

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Susan K. Freeman, RESPONDENT

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Date

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Arianna Aron, COMPLAINANT

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Date

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Kristin H. Johnson, DIRECTOR  
IOWA CIVIL RIGHTS COMMISSION

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Date