

Witness Name: Terry Clemans

Organization (if any): National Consumer Reporting Association

City/Town: Roselle

State: IL

ZIP: 60172

County Rules and Administration Committee 9/4/2019 930a 19-4770

**DO NOT ATTEND THE MEETING but REGISTER IN OPPOSITION to a specific item (You may add written comments below)**

(via email)

Witness Name: Nichole Oswald

Organization (if any): Chicagoland Apartment Association

City/Town: Chicago

State: IL

ZIP: 60661

Good morning Chairman Suffredin and members of the Rules and Administration Committee. My name is Nichole Oswald and I am a constituent of Commissioner Brandon Johnson's district in Oak Park. I help manage roughly 1,200 apartments in Hyde Park and I'm a member of the Chicagoland Apartment Association.

We employ almost 50 people in Hyde Park and provide housing to about 3,500 residents of Cook County. I'm here today to express our concern that the Rules of the Just Housing Ordinance ignore the financial impact of "holding a unit" for smaller management companies like ours.

Section 740.110 currently allows for a specific unit to be held open for up to 17 days while an applicant, who has not been initially extended an offer based on their criminal history, appeals the provider's decision. Holding an apartment "vacant" and not "marketing" that apartment for over half of a given month could create serious hardship for our company.

The cost of a vacancy ranges from \$4,800 to \$25,000 based on the size of the apartment and how long it stays vacant. This financial burden would affect our ability to operate and to obtain financing on future deals within the city. Section 740.110 increases the possibility of these losses substantially.

We don't want to have to consider an increase in rents for the purposes of giving initially-denied applicants five business days to just let us know they want to appeal, then another five business days to submit mitigating evidence, and another three business days to communicate our decision with them. We ask you consider a much shorter time frame: 48 hours to notify of intent to appeal, and an additional 72 hours to submit mitigating evidence. This timeline is attainable if an applicant who deserves a second chance is serious about leasing a unit from us. Our company looks forward to working in good faith with Cook County to achieve the goals of the Just Housing Ordinance, but we recommend this committee considers an amendment to Section 740.110 to assist small management companies like ours in Hyde Park and throughout Cook County.

Finally, our company has an obligation to keep our existing resident base as safe as possible. Within our market we have a lot of students that are moving to Chicago from other states and other countries. One of the first questions out of towners ask when they are first touring our properties is "Is this building safe?" We don't want to have to tell them that in Cook County our look back period is less than the industry standard and that we can't consider crimes like theft, fraud, and weapons possession when we screen their future neighbors. When residents don't feel safe in their own home, that is truly a tragedy.

Thank you for your time this morning.

Witness Name: Tom Benedetto

Organization (if any): Chicagoland Apartment Association

City/Town: Chicago

State: IL

ZIP: 60661

County Rules and Administration Committee 9/4/2019 930a 19-4770

ATTEND THE MEETING and SPEAK IN OPPOSITION to a specific item (You may still add written comments below)

Written Statement?

We'd like to thank members of the committee who have met with us since the Just Housing Ordinance was passed in April. We appreciate the thoughtful feedback we have received regarding the ordinance.

CAA would also like to thank Commissioner Brandon Johnson for introducing an amendment to extend the effective date to December 31 so that the industry can be adequately educated on the new law and work with their staffs to amend their operations. The multifamily housing industry is committed to the process.

Finally, we'd like to extend gratitude to the Department of Human Rights and Ethics Director Keith Chambers for his transparency and fairness during the Rulemaking process...

Members of the Chicagoland Apartment Association share the goal of helping justice-involved persons obtain housing and successfully transition back to society.

By bringing our members' knowledge of the industry to the table in the Rulemaking process, our goal has been to find a pathway to making this ordinance both feasible for owners and effective for applicants. Housing providers we represent are asking for three changes to help achieve that goal.

First, we ask that the committee considers reducing the time a unit is held off the market during appeal. In Section 740.110 the amount of time given to an applicant to appeal a rental decision could last up to SEVENTEEN days. This poses a major financial burden not only for owners in the neighborhood but for existing tenants, a point one of our members will testify to.

We know of no other ordinance or law across the country that requires owners to hold units during a process such as the one outlined in Section 740.110. We ask you to consider one, five-day timeframe to avoid drastic effects in the county's housing market.

Second, we ask for additional categories of crimes be considered a "demonstrable risk" in section 720.120. Owners should be able to assess additional crimes that may present risks to safety and security like fraud, theft, and weapons possession.

Finally, a seven-year look back period is the industry standard for screening nationwide. In the rulemaking process the Human Rights Commission discussed look back periods between 3-years and 10-years instituted in other municipalities. They decided a 5 year look-back period was the right compromise for

Cook County. By accepting their math and ignoring the industry standard, the County would be arbitrarily making the ordinance's implementation much more difficult.

At the end of the day, property owners and managers have a moral, legal, and financial responsibility to protect current tenants from risk in apartment communities and they take their responsibilities very seriously. CAA appreciates being at the table to ensure the goals of the Just Housing Ordinance are achieved. Thank you for your time.

Witness Name: Courtney Eovaldi

Organization (if any): Chicagoland Apartment Association/First Advantage

City/Town: Chicago

State: IL

ZIP: 60661

County Rules and Administration Committee 9/4/2019 930a 19-4770

ATTEND THE MEETING and SPEAK IN OPPOSITION to a specific item (You may still add written comments below)

Greetings Members of the Cook County Board, my name is Courtney Eovaldi...

I have been in the resident background screening for 3 decades providing credit, eviction, criminal and fraud products to landlords and property management companies nationally and in cook county

I'm proud to work in resident background screening because housing providers have a responsibility to keep their residents safe.

The goal and intent of the Just Housing Ordinance allows for justice-involved persons to reacclimate to society after serving their time, and under the ordinance, owners still have the ability to understand a residents past and assess if they are a fit for the apartment community.

As you know, accuracy matters when it comes to background screening.

Today, the process for obtaining accurate information regarding a prospective resident's past is especially difficult in Cook County already.

Of the 3,007 counties in the country, Cook County is the second largest and is one of the only metropolitan counties to not supply court records information digitally – or on-line. It is required to physically go into the county during the court house hours to gain access to these records.

First advantage uses multiple third party providers in the courthouse to access these records in real-time for their clients.

While manually-obtaining records extends the application process timeline for our clients already, they count on having the most up-to-date, accurate information in order to be fair and transparent to applicants. This eliminates the risk of mistakes and inaccuracies that are burdensome to applicants.

But adding more time to this process, as is suggested in this version of the Rules, will be detrimental to our customers.

The industry promotes safe housing through transparency. We see the bifurcated appeal process – five business days to notify and five business days to produce mitigating evidence – as an extra layer of difficulty for property managers operating in Cook County's court system. As a national provider, to our knowledge no other ordinance in the country requires housing providers to keep a unit off the market. Please consider reducing the timeline in Section 740.100. On behalf of First Advantage, thank you for your time and consideration today.

Witness Name: Tim Ryan

Organization (if any): Mainstreet Organization of Realtors

City/Town: Tinley Park

State: IL

ZIP: 60477

County Rules and Administration Committee 9/4/2019 930a 19-4770--Rules on the Just Housing ordinance.

ATTEND THE MEETING and SPEAK IN OPPOSITION to a specific item (You may still add written comments below)

No written statement

Witness Name: Michael Rabbitt

Organization (if any): Neighbors for Affordable Housing

City/Town: Chicago

State: IL

ZIP: 60646

County Rules and Administration Committee 9/4/2019 930a 19-2394

ATTEND THE MEETING and SPEAK FOR INFORMATION ONLY (You may still add written comments below)

My name is Michael Rabbitt. I'm a founding member of Neighbors for Affordable Housing. I'm here today as a proud supporter of the Just Housing amendment and to ensure the proposed rules carry out the goals of the amendment.

It is crucial that the committee approves rules which align with the goals of equity and inclusion, in which everyone in Cook County will have a fair chance at housing. And for formerly incarcerated people and their families – people trying to turn their lives around – there must be access to safe, secure, and affordable housing.

As these rules are evaluated and debated, please carefully consider these critical guiding principles:

Housing is a human right.

Housing is a critical determinant to healthy communities.

Housing is one of the greatest challenges faced by people returning from prison or jail.

In considering the rules to adopt, we must examine them thru a racial equity lens. We must consider disproportionately high rates of arrest and incarceration based on race. We must not forget that Black and Latino citizens are disproportionately arrested, convicted, and incarcerated.

We must also consider these decisions in the larger context of history. The roots of housing discrimination, particularly as it affects black Americans, extend deep into our nation's history. There is a direct and uninterrupted line connecting slavery, Jim Crow, racism, and segregation to the mass incarceration of today.

We must face the legacy of this history, and work to overcome it. The Just Housing ordinance is one example, but only through the proper implementation of amendments such as this can we begin to reverse decades upon decades of discrimination.

Throughout history, achievements in civil rights have been met with resistance from powerful forces seeking to maintain the status quo. In making decisions on the final rules for this amendment, please remember the struggle to enforce change that holds up against strong opposition.

To that end, these rules must not exempt public housing authorities. We cannot create different sets of rules for privately owned housing versus public housing. Plus, we should avoid the risk that this could lead to the exemption of other federally subsidized housing providers. We must ensure access to affordable housing options which are already limited.

It's also crucial that every applicant be considered as an individual, and defining demonstrable risk in terms of categories of convictions undermines this goal. Blanket bans based on these categories are unfair and contradictory to the spirit of the amendment, which focuses on the ability to be a good neighbor and community member.

Housing is the cornerstone of strong communities and thriving families. Housing forms a critical part of people's future prospects and aspirations. And for some of the most marginalized and vulnerable people in Cook County, a home is life-changing and provides a start on the path towards a better life.

I urge you to embrace this testimony in finalizing the Just Housing rules. Thank you!



Witness Name: Allan Lindrup

Organization (if any): small landlord (part of couple)

City/Town: Chicago

State: IL

ZIP: 60649

County Rules and Administration Committee 9/4/2019 930a 19-2394

ATTEND THE MEETING and SPEAK FOR INFORMATION ONLY (You may still add written comments below)

Testimony by Allan J. Lindrup

Regarding "Just Housing Amendment" Rules

Good morning. My name is Allan Lindrup and my life partner and I have a four flat in the South Shore neighborhood of Chicago. We live in one unit and rent out the other three. We are supporters of the Just Housing Amendment to the Cook County Human Rights Ordinance and have always been open to renting to those with criminal records when we assess they do not pose a significant risk to other tenants or the property.

We agree with the Just Housing Coalition that just considering criminal history from the last three years will be adequate.

We also agree with the Coalition that there is no need to have examples of categories of criminal convictions in the Rules. An applicant's criminal record, where a search finds and reports it, should speak for itself. Of course, an applicant will be given an opportunity to dispute the details as well as to give information and documentation regarding rehabilitation and their current character.

If an applicant with a record is the strongest applicant in terms of income level, job stability, credit score, etc., their past criminal record should infrequently disqualify them. In our experience, where a household with a criminal record is not accepted it is because there is another applicant that is stronger in terms of income, job stability, credit score, etc.

Witness Name: Eiran Feldman

Organization (if any): South Side Community Investors Association

City/Town: Chicago

State: IL

ZIP: 60619

County Rules and Administration Committee 9/4/2019 930a 19-4770 - Just Housing

ATTEND THE MEETING and SPEAK IN OPPOSITION to a specific item (You may still add written comments below)

Just housing will put many south and west side communities at increased risk of violence and crime.

Witness Name: Troy OQuin

City/Town: Homewood

State: IL

ZIP: 60430

County Rules and Administration Committee 9/4/2019 930a 19-2394 Just Housing Amendment

ATTEND THE MEETING and SPEAK FOR INFORMATION ONLY (You may still add written comments below)

No i will Have a verbal statement

Witness Name: Dan Schermerhorn

Organization (if any): Illinois Realtors

City/Town: Evanston

State: IL

ZIP: 60201

County Rules and Administration Committee 9/4/2019 930a 19-4770

ATTEND THE MEETING and SPEAK IN OPPOSITION to a specific item (You may still add written comments below)

Written Statement?

NA