

5. It is understood that the execution of this Consent Order does not constitute an admission by the Respondents of any violation of the Fair Housing Act.
6. The parties agree that HUD shall file with the Office of Administrative Law Judges a Motion for Entry of an Initial Decision and Consent Order, along with this Initial Decision and Consent Order, after this document is executed by all parties.
7. This Consent Order is binding upon Respondents, their members, principals, owners, employees, successors, agents, assigns, and all others in active concert with them.
8. This Consent Order is a full settlement of all claims by Complainant that are in any way related to the allegations set forth in the Charge; and a full settlement of any and all claims Respondents may have against each other that are in any way related to the allegations set forth in the Charge.
9. In exchange for compliance with the provisions of this Agreement, Complainant hereby forever waives, releases, discharges, and covenants not to sue the Department or Respondents or their members, employees, successors, agents, attorneys or assigns with regard to any and all claims, damages and injuries of whatever nature, whether presently known or unknown, arising out of, or in any way related to, the subject matter of OALJ Number 19-AF-0015-FH-003, or the Charge or Complaint of Discrimination related thereto.
10. In exchange for compliance with the provisions of this Agreement, Respondents hereby forever waive, release, discharge, and covenant not to sue the Department or Complainant, or their employees, successors, agents, assigns, or attorneys with regard to any and all claims, damages and injuries of whatever nature, whether presently known or unknown, arising out of, or in any way related to the subject matter of OALJ Number 19-AF-0015-FH-003, or the Charge or Complaint of Discrimination related thereto.
11. In exchange for compliance with the provisions of this Agreement, Respondents hereby forever waive, release, discharge, and covenant not to sue each other, individually, or their businesses, employees, successors, agents, assigns, or heirs with regard to any and all claims, damages and injuries of whatever nature, whether presently known or unknown, arising out of, or in any way related to the subject matter of OALJ Number 19-AF-0015-FH-003, or the Charge or Complaint of Discrimination related thereto.
12. Pursuant to 24 C.F.R. § 180.680, this Consent Order is a public document.

III. RELIEF FOR COMPLAINANT

13. Within thirty (30) days of the effective date of this Consent Order, Respondent Ramona Venskus shall pay to Complainant by certified or cashier's check the sum of thirteen thousand dollars (\$13,000.00) and Respondent Page Realty, LLC shall pay to

Complainant by certified or cashier's check the sum of five thousand dollars (\$5,000.00) in full settlement of Complainant's claims for damages arising out of the allegations presented in the Charge. Respondents shall make their checks payable to "Pine Tree Legal Assistance, Inc." and send the checks to:

Patricia Ender, Esq.
Pine Tree Legal Assistance, Inc.
39 Green Street
Augusta, ME 04332

Respondents shall photocopy this check and send it to HUD's Regional Counsel for New England at the address given below:

Miniard Culpepper, Regional Counsel
c/o Benjamin Gworek, Trial Attorney
U.S. Department of Housing and Urban Development
Office of Regional Counsel
10 Causeway Street, Room 310
Boston, MA 02222

IV. RELIEF IN THE PUBLIC INTEREST

14. Respondents, their agents, employees, successors, members and assigns, and all other persons in active concert or participation with any of them, are hereby enjoined from violating the Fair Housing Act, including:
 - A. Refusing to rent, or refusing to negotiate for the rental of, or otherwise making unavailable or denying, a dwelling to any person because of familial status, as prohibited by the Act, 42 U.S.C. § 3604(a).
 - B. Making, printing, or publishing any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicate a preference, limitation, or discrimination based on familial status, or any intention to make any such preference, limitation, or discrimination, as prohibited by the Act, 42 U.S.C. § 3604(c).
15. Respondent Ms. Venksus and Paul Wade, the owner of Respondent Page Realty, LLC, shall, within ninety (90) days of the effective date of this Consent Order, attend fair housing training to be conducted by a qualified fair housing enforcement agency. The training must cover Respondents' responsibility under federal, state, and local fair housing laws. Respondents may contact Daniel Weaver, Supervisory Equal Opportunity Specialist, at (617) 994-8311 for assistance in locating a qualified fair housing enforcement agency to conduct the required training. Respondents shall provide a certificate of completion to HUD in a form to be provided to Respondents by HUD. Respondents as well as the instructor conducting the training shall sign and date the certificate of completion and send it to HUD within thirty (30) days of

completion of the training. These certifications should be sent to ConciliationMonitoringRegion1FHED@hud.gov and:

Susan Forward, Regional Director
U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity
10 Causeway Street, Room 308
Boston, MA 02222

V. REPORTING AND RECORD KEEPING

16. During the term of this Consent Order, Respondents shall notify HUD of any formal complaint filed against them with a local, state, or federal agency regarding equal opportunity or discrimination in housing within ten (10) days of receipt of any such complaint. Respondents shall provide a copy of the complaint with the notification to HUD. Respondents provide such notification to the Regional Director at the address in Paragraph 12.

VI. COMPLIANCE

17. During the term of this Consent Order, HUD may review compliance with this Consent Order, subject to and in accordance with HUD regulations. As part of such review, HUD may, upon providing advance notice of said inspection, inspect Respondents' residential rental properties, examine witnesses, and copy pertinent records of Respondents. Respondents agree to provide their full cooperation in any review undertaken by HUD to ensure compliance with this Consent Order.

18. Upon breach of any provision of this Consent Order, HUD may refer this matter to the Department of Justice to petition the United States Court of Appeals for the First Circuit to enforce the Consent Order and for any other appropriate relief in accordance with 42 U.S.C. § 3612(j).

VII. ADMINISTRATION

19. This Consent Order is entered into pursuant to 42 U.S.C. § 3612(g)(3) and 24 C.F.R. § 180.450. This Consent Order will become effective and final thirty (30) calendar days from the date it is issued by the HUD ALJ or earlier, if affirmed by the Secretary within that time ("effective date"). 24 C.F.R. § 180.680(b).

20. This Consent Order shall remain in effect for a period of three (3) years from its effective date.

21. This Consent Order does not in any way limit or restrict HUD's authority to investigate any other unrelated complaints involving Respondents made pursuant to the Act, or any other complaints within HUD's jurisdiction.

22. If Respondents need an extension of time in order to satisfy a deadline provided in this Consent Order, such extension must be obtained in writing from counsel for the Department.
23. The signature of the parties to this Consent Order constitute a waiver of any right to apply for attorney fees or costs pursuant to 24 C.F.R. § 180.705. Each party is responsible for its own attorney fees and costs, if any.
24. The parties agree that in the interest of a prompt conclusion of this matter, the execution of this Consent Order may be accomplished by the parties' signatures on separate pages of this Consent Order, with the signature pages and Consent Order to constitute one document to be filed with the Office of Administrative Law Judges. Signature pages may be provided by facsimile or electronic transmission.

VIII. AGREEMENT OF THE PARTIES

25. The parties below have read this Consent Order in HUD ALJ NO. 19-AF-0015-FH-003 and have willingly signed it with a full understanding of the rights it confers and the responsibilities it imposes upon them, as signified by their signature, or that of their counsel, below:


[SIGNATURE PAGES TO FOLLOW]

FOR COMPLAINANT:


Jill Hunter
For Pine Tree Legal Assistance, Inc.

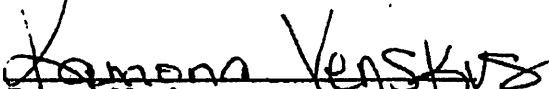
Date: 2-20-19

COUNSEL FOR COMPLAINANT:

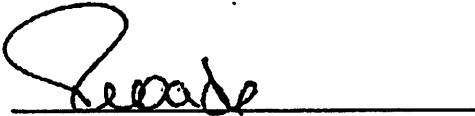

Patricia Ender, Esq. ME Bar # 2831
Pine Tree Legal Assistance, Inc.

Date: 2-20-19

FOR RESPONDENTS:

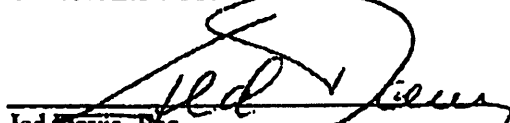

Ramona Venskus

Date: 2.25.19


Paul Wade
For Page Realty, LLC

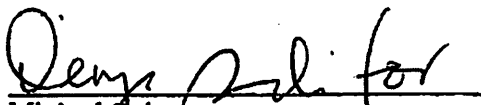
Date: 2/20/19

COUNSEL FOR RESPONDENT PAGE REALTY, LLC:


Jed Davis, Esq.
Mitchell & Davis, Attorneys-at-Law

Date: 2/20/19

FOR THE DEPARTMENT:


Miniard Culpepper
Regional Counsel for New England
U.S. Department of Housing and Urban
Development

Date: 3/6/19

FOR COMPLAINANT:

Jill Hunter
For Pine Tree Legal Assistance, Inc.

Date: _____

COUNSEL FOR COMPLAINANT:

Patricia Ender, Esq.
Pine Tree Legal Assistance, Inc.

Date: _____

FOR RESPONDENTS:

Ramona Venskus

Date: _____

COUNSEL FOR RESPONDENT RAMONA VENSKUS



Neil Shankman, Esq.
Shankman & Associates Legal Center

Date: 2/28/19

Paul Wade
For Page Realty, LLC

Date: _____

COUNSEL FOR RESPONDENT PAGE REALTY, LLC:

Jed Davis, Esq.
Mitchell & Davis, Attorneys-at-Law

Date: _____

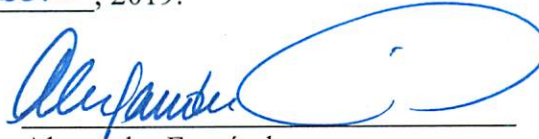
FOR THE DEPARTMENT:

Date: _____

IX. ORDER OF THE COURT

On March 7, 2018, the parties forwarded to the Office of Administrative Law Judges the foregoing proposed Initial Decision and Consent Order, incorporating the terms of their agreement. The Administrative Law Judge, after reading the agreement, finds the agreement to be in the public interest. All parties have given their consent and signed the agreement incorporated in the foregoing Initial Decision and Consent Order, which is hereby accepted and entered.

So ORDERED, this 18th day of March, 2019.

A handwritten signature in blue ink, appearing to read "Alexander Fernández", written over a horizontal line. The signature is stylized and includes a large circular flourish at the end.

Alexander Fernández
Administrative Law Judge