

**UNITED STATES OF AMERICA**  
**DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
**OFFICE OF ADMINISTRATIVE LAW JUDGES**

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The Secretary, United States Department  
of Housing and Urban Development,  
on behalf of Complainants Erika Duffy and  
Krista Duffy

Charging Party,

v.

Good Team Realty LLC,  
Jack O Cohen Revocable Trust, and Jack Cohen,

Respondents.

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) HUD ALJ No. 24-JM-0381-FH-021

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) FHEO No. 01-19-2644-8

)  
) November 14, 2024  
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)

**INITIAL DECISION AND CONSENT ORDER**

**I. BACKGROUND**

1. This matter arose from a complaint of discrimination filed by Complainants Erika Duffy and Krista Duffy (“Complainants”) on August 21, 2023, with the United States Department of Housing and Urban Development (“Department” or “HUD”) pursuant to the Fair Housing Act, 42 U.S.C. §§ 3601-19 (“Act”).

2. On September 17, 2023, the Department issued a Charge of Discrimination (“Charge”) against Good Team Realty LLC, Jack O Cohen Revocable Trust, and Jack Cohen (“Respondents”) alleging violations of 42 U.S.C. §§ 3604(f)(1)(A), and 3604(f)(2)(A); which prohibit offering discriminatory terms or conditions in the rental of housing on the basis of disability.

3. The Complainant, Respondents, and the Department (“parties”) as an offer and compromise to buy peace have agreed to resolve this matter without the need for a hearing before a HUD Administrative Law Judge (“ALJ”). The parties have consented to the entry of this Initial Decision and Consent Order (“Consent Order”) as indicated by their signatures below.

**II. GENERAL PROVISIONS**

4. The parties acknowledge that this Consent Order is a voluntary and full resolution of the disputed Charge. No party has been coerced or in any way forced to become a party to this Consent

Order. The parties acknowledge that they have read and fully understand the significance of the provisions of this Consent Order and their obligations as set forth below.

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. The Respondents deny any violation of the Fair Housing Act and all allegations of fault, wrongdoing, or liability alleged in the Charge.

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 in the ownership, rental, and management of residential properties for which the Jack O Cohen Revocable Trust is trustee.

8. This Consent Order is a full settlement of all claims by Complainants that are in any way related to the allegations set forth in the Charge. The Complainants hereby forever waive, release, and discharge the Respondents and their attorneys, representatives, employees, and agents from any and all claims, causes of action, demands, fees, and liabilities of any kind, whether known or unknown, that the parties have, have had, or may have concerning the subject matter of HUD ALJ No. 24-JM-0381-FH-021, whether arising civilly, criminally, or under the Fair Housing Act and the events described in the Charge. The extent of this release is intended to have the broadest possible application and includes, but is not limited to, any tort, contract, common law, constitutional, and statutory claims arising out of any federal, state, or local laws.

9. Pursuant to 24 C.F.R. § 180.680, this Consent Order is a public document.

### **III. RELIEF FOR COMPLAINANT**

10. Respondents shall pay Complainants a total of five thousand dollars (\$5,000.00) in full settlement of Complainants' claims to settle the allegations presented in the Charge. Respondents shall make such payment to Complainants by certified or cashier's check(s) no later than November 14, 2024. Respondents shall make the check(s) payable to Erika Duffy and Krista Duffy and sent to:

Erika Duffy and Krista Duffy  
[REDACTED]  
[REDACTED]

### **IV. RELIEF IN THE PUBLIC INTEREST**

11. 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. Discriminating in the rental, or otherwise making unavailable or denying, a dwelling to any renter on the basis of disability, as prohibited by the Act, 42 U.S.C. § 3604(f)(1)(a).



- B. Discriminating against any person in the terms, conditions, or privileges of the rental of a dwelling, or in the provision of services or facilities in connection with such dwelling, on the basis of familial status, as prohibited by the Act, 42 U.S.C. § 3604(f)(2)(A).

12. Within ninety (90) days of the entry of this Consent Order, Respondents shall develop and provide HUD a written policy explaining the rights of potential tenants regarding requests for reasonable accommodations. Such policy shall be provided to applicants for tenancy or to existing tenants upon request.

## **V. REPORTING AND RECORD KEEPING**

13. 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) business days of receipt of any such complaint. Respondents shall provide a copy of the complaint with the notification to HUD. Respondents shall provide such notification to:

Daniel Weaver, 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

## **VI. COMPLIANCE**

14. Upon breach of any provision of this Consent Order then in effect, 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**

15. 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).

16. Paragraphs 11 and 13 of this Consent Order shall remain in effect for a period of one (1) year from its effective date, all others in effect without termination.

17. 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.

18. 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.

19. 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.

20. 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**

21. The parties below have read this Consent Order in HUDOHA 20-JM-0295-FH-020 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]



IX. COMPLAINANTS

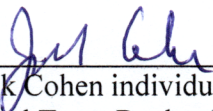
Erika L. Duffy  
Erika Duffy

Date: 10-21-24

Krista N. Duffy  
Krista Duffy

Date: 10-21-24

**X. FOR RESPONDENTS:**

  
\_\_\_\_\_  
Jack Cohen individually and on behalf of  
Good Team Realty, LLC and  
Jack O Cohen Revocable Trust

Date: 11/6/24



**XI. FOR THE DEPARTMENT:**

**DERYA  
SAMADI**

Digitally signed by: DERYA SAMADI  
DN: CN = DERYA SAMADI, C = US, O  
= U.S. Government, OU = Department  
of Housing and Urban Development,  
Office of General Counsel  
Date: 2024.11.07 11:34:07 -05'00'

Date: \_\_\_\_\_

Derya Samadi  
Regional Counsel for New England  
U.S. Department of Housing and Urban  
Development  
10 Causeway Street, Room 310  
Boston, MA 02222

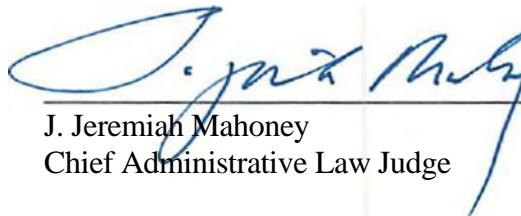
## **XII. ORDER OF THE COURT**

The foregoing order was presented to the undersigned Administrative Law Judge (ALJ) for approval on November 7, 2024. In accord with 24 C.F.R. § 180.450, the ALJ shall accept a settlement agreement agreed to by the parties if the agreement is in the public interest,

After considering the record in its entirety, the undersigned ALJ has independently determined that the agreement between the parties does not offend the public interest and it is approved. All parties have given their consent and signed the agreement incorporated in the foregoing Consent Order, which is hereby accepted and issued.

This Consent Order carries no precedential weight, as the matter has been reviewed solely to determine that the parties' settlement does not offend the public interest. No opinion is expressed on legal or policy statements contained herein, nor the form and quantum of the agreed relief.

So **ORDERED** this 14th day of November, 2024.



J. Jeremiah Mahoney  
Chief Administrative Law Judge