

**COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE
PENNSYLVANIA HUMAN RELATIONS COMMISSION**

April Crenney	:	
Complainant,	:	
v.	:	PHRC CASE NO. 202101192
	:	
1400 Main Holdings, LLC.,	:	
AJH Management Company,	:	
Shay Carelly	:	
Respondents.	:	
	:	

**STATEMENT OF THE CASE
FINDINGS OF FACT
CONCLUSIONS OF LAW
OPINION
RECOMMENDATION OF PERMANENT HEARING EXAMINER
FINAL ORDER**

STATEMENT OF THE CASE

Darlene Hemerka, Permanent Hearing Examiner. A public hearing was held in this matter in Washington County, Pennsylvania, on October 13, 2023. Complainant April Creeney filed a Complaint in PHRC Case No. 202102052 on October 28, 2021, against Respondents: 1400 Main Holdings LLC, AJH Management Company and Shay Carelly (collectively Respondents). The Complaint alleged that Respondents discriminated against Creeney on the basis of disability in two ways. One by refusing to modify their parking policy to provide her with an assigned parking spot and two by refusing to permit Creeney to make a reasonable modification to her apartment. Respondents filed a timely Answer denying the allegations set forth in the Complaint. Complainant was represented by Summit Legal Aid and Respondents were represented by Matthew Polaha, Esq. Robert Taylor, Esq. represented the Commonwealth's interest in the Complaint.

FINDINGS OF FACT¹

1. On July 26, 2021, Complainant, April Creeneey, (hereafter Creeneey) and her husband signed a lease with Respondent, 1400 Main Holdings, LLC. (“1400 Main”) to rent apartment 259H, located at 1400 Main Street, in Canonsburg, Pennsylvania. J-1.
2. Respondent AJH Management Company (AJH) owns 1400 Main. Tr. 105.
3. Respondent Shay Carelly (Carelly) is a general manager at 1400 Main and an employee of AJH. Tr. 102.
4. The lease term began September 1, 2021, and ended August 31, 2022. *Id.*
5. Pursuant to the lease agreement, Creeneey had to get Respondents’ permission prior to making any change to the leased premises. J-1 ¶ 22
6. In addition, Creeneey was responsible for paying to restore the premises back to its original condition. J-1 ¶ 22.
7. On September 1, 2021, Creeneey emailed Carelly and explained that she had numerous disabilities and expressed concern because there was only one handicap accessible parking space near her unit. J-2
8. In that email, Creeneey requested that “a regular spot be converted” or that she be assigned a space. *Id.*
9. Creeneey also requested a meeting with Carelly about the parking issue. *Id.*
10. Carelly responded on September 7, 2021, stating that she could not assign a space, but would look into having an additional space put in. J-2.

¹ Explanation of Abbreviations
J- is Joint Exhibit
Tr. is the hearing transcript
O.D. is an official document

11. On September 21, 2021, Creeney emailed Carelly and requested safety bars in the shower. J-3.
12. Carelly responded the same day and notified Creeney that permanent grab bars were not permitted but Creeney could purchase and install suction cup grab bars. J-3
13. On October 15, 2021, Summit Legal Aid emailed Carelly on Creeney's behalf and stated metal grab bars anchored to the wall were required to meet Creeney's needs. Plastic grab bars would not provide the needed support. J-6.
14. Carelly responded the same day stating that her response would not be different from the accommodations Respondents offered previously. *Id.*
15. On or about October 28, 2021, Creeney filed a verified Complaint with the Pennsylvania Human Relations Commission (PHRC) at PHRC case number 202101192. J-7.
16. On or about January 26, 2022, Respondents filed an Answer with the PHRC. J-8.
17. On September 20, 2022, the PHRC issued a Finding of Probable Cause crediting Creeney's allegations. O.D.
18. Conciliation failed on October 27, 2022. O.D.
19. A Public Hearing was held on October 13, 2023. Tr. 1.

CONCLUSIONS OF LAW

1. The Pennsylvania Human Relations Commission (PHRC) has jurisdiction over the parties and the subject matter of this case.
2. The parties have fully complied with the procedural prerequisites to a Public Hearing in this case.
3. April Creoney (Creoney), is a person within the meaning of the Pennsylvania Human Relations Act (PHRA).
4. 1400 Main Holdings LLC, AJH Management Company, and Shay Carelly are persons within the meaning of the PHRA.
5. Section 5(h)(3.2) of the PHRA makes it an unlawful discriminatory practice “for any person to: [r]efuse 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 housing accommodation”
6. To establish a prima facie case of discrimination by refusing to provide a reasonable accommodation, Creoney must show:
 - A. She is a person with a disability;
 - B. Respondents knew or reasonably should have known that Creoney is a person with a disability;
 - C. Creoney requested an accommodation in Respondents’ rules, policies, practices, or services;
 - D. The requested accommodation may be necessary to afford Creoney an equal opportunity to use and enjoy the dwelling; and
 - E. Respondents refused to make the accommodation Creoney requested.

7. Creeney has not established a prima facie case of discrimination for refusing to provide a reasonable accommodation because she failed to show that the requested accommodation was necessary to afford her an equal opportunity to use and enjoy the dwelling.

Therefore, this claim should be dismissed.

8. Section 5(h)(3.1) of the PHRA makes it an unlawful discriminatory practice “for any person to: [r]efuse to permit, at the expense of a person with a handicap, reasonable modifications of existing premises occupied...by such person if such modifications may be necessary to afford such person full enjoyment of the premises, except that, in the case of a rental, the landlord may, where it is reasonable to do so, grant permission for a modification if the renter agrees to restore the interior of the premises to the condition that existed before the modification, with reasonable wear and tear excepted.”

9. To establish a prima facie case of discrimination by refusing to permit a reasonable modification Creeney must show:

A. She is a person with a disability;

B. Respondents knew or reasonably should have known that Creeney is a person with a disability;

C. Creeney requested permission to modify her apartment;

D. The requested modification may be necessary to afford Creeney an equal opportunity to use and enjoy the dwelling; and

E. Respondents refused to allow Creeney to make the modification requested.

10. Creeney established a prima facie case of discrimination for failure to permit a reasonable modification.

11. Once Creeney established a prima facie case of discrimination, the burden shifted to

Respondents to show that the proposed modification was unreasonable.

12. Respondents failed to establish that the proposed modification was unreasonable.
13. The PHRC may award actual damages, including damages caused by embarrassment and humiliation.
14. Embarrassment and humiliation damages encompass claims of emotional distress.

OPINION

This case arises out of a Complaint filed by April Creeneey (Creeneey) against 1400 Main Holdings LLC, AJH Management Company and Shay Carelly (collectively Respondents). Creeneey's PHRC Complaint was filed on October 28, 2021, at PHRC Case Number 202101192. Creeneey's Complaint alleged that Respondents failed to accommodate her disability specifically by refusing to give her an assigned parking space and refusing to permit her to make a reasonable modification to the apartment by installing permanent grab bars in the shower.

Pennsylvania Human Relations Commission (PHRC) staff investigated the Complaint and found probable cause to credit both of Creeneey's allegations of discrimination. The PHRC and the parties attempted to resolve the case through conference, conciliation, and persuasion. The efforts were unsuccessful, and the case was approved for a public hearing. The hearing was held on October 13, 2023, before Darlene Hemerka, Permanent Hearing Examiner. Creeneey was represented by Summit Legal Aid and Respondents were represented by Matthew Polaha Esq. Attorney Robert Taylor represented the Commonwealth's interest in the Complaint. The parties submitted post-hearing briefs in November 2023.

Under the Pennsylvania Human Relations Act (PHRA), the term "handicap or disability," with respect to a person, means:

- (1) a physical or mental impairment which substantially limits one or more of such person's major life activities;
- (2) a record of having such an impairment; or
- (3) being regarded as having such an

impairment... 43 P.S. 954 p.1

The PHRA provisions are supplemented by applicable regulations promulgated by the PHRC at 16 Pa. Code §44.4. The regulations state:

Handicapped or disabled person - Includes the following:

- (i) A person who has or is one of the following:
 - (A) A physical or mental impairment, which substantially limits one or more major life activities.
 - (B) A record of such impairment.
 - (C) Regarded as having such an impairment.
- (ii) As used in subparagraph (i) of this paragraph, the phrase:
 - (A) "physical or mental impairment" means a physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine or mental or psychological disorder, such as mental illness, and specific learning disabilities.
 - (B) "major life activities" means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.
 - (C) "has a record of such impairment" means has a history of or has been misclassified as having a mental or physical impairment that substantially limits one or more major life activities.
 - (D) "is regarded as having such an impairment" means has a physical or mental impairment that does not substantially limit major life activities but that is treated by an employer or owner, operator, or provider of a public accommodation as constituting such a limitation; has a physical or mental impairment that substantially limits major life activities only as a result of the attitudes of others toward such impairment; or has none of the impairments defined in subparagraph (i)(A) of this paragraph but is treated by an employer or owner, operator, or provider of a public accommodation as having such an impairment.

Pennsylvania courts generally interpret the PHRA "as identical to federal anti-discrimination laws except where there is something specifically different in its language requiring that it be treated differently." *Fair Hous. Rights Ctr. v. Morgan Props. Mgmt. Co., LLC*, No. 16-4677, 2017 U.S. Dist. LEXIS 55249, at *8 n.2 (E.D. Pa. Apr. 11, 2017).

Regarding Creeney's reasonable accommodation claim, Section 5(h) of the PHRA provides in relevant part,

"It shall be an unlawful discriminatory practice...for a person to refuse to make reasonable accommodations in rules, policies or practices or services when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a housing accommodation."

To establish a prima facie case of a refusal to provide a reasonable accommodation, Creeney must show by a preponderance of the evidence that (1) she is a person with a disability; (2) Respondents knew or reasonably should have known that she is a person with a disability; (3) she requested an accommodation in the rules, policies, practices, or services of Respondents; (4) the requested accommodation may be necessary to afford her an equal opportunity to use and enjoy the dwelling; and (5) Respondents refused her request to make such accommodation or failed to respond or delayed responding to the request such that it amounted to a denial. *United States v. Cal. Mobile Home Park Mgmt. Co.*, 107 F.3d 1374, 1380 (9th Cir. 1997).

In this case, the facts regarding the first two elements are largely undisputed. On September 1, 2021, Creeney emailed Carelly and stated, "I have an extremely weakened immune system and suffer from common variable immunodeficiency disease that requires infusions every 3-4 weeks. As a result of COVID my joints are bone on bone with little cartilage attachment. The term for so many joints with arthritis is polyarthritis." J-2. Creeney's email then explained how these conditions limit her. "I am also trying to avoid constantly needing a motorized wheelchair

and persevere as long as possible with my walker. I am not a very good walker or very steady at this time.” *Id.*

At the hearing, Carelly testified, “it's not my place to make a judgment or an opinion on someone's disabilities or anything of that nature. That's not my job.” Tr. 148. Carelly was asked whether she needed medical documents to verify Creeney’s disability and Carelly agreed she did not. *Id.* Based on this evidence the Commission finds that Creeney has met her burden on the first two elements.²

Further the Commission finds that Creeney’s email on September 1, 2021, also contained a request for reasonable accommodations regarding a parking space. Specifically, “Is it possible to have more than 1 space since clearly there is a need? Can I get a note from anyone one of my myriad of physicians so that I may be assigned a space? Or can some of the “regular parking” be converted?” J-2. Thus, Creeney has established element 3.

Element 4 is that the reasonable accommodation be necessary for Creeney to use and enjoy her dwelling. The Third Circuit has held that under § 3604(f)(3)(B) the term necessary means that the accommodation must be essential, not just preferable. *Vorchheimer v. Philadelphian Owners Ass'n*, 903 F.3d 100,107 (3d Cir. Pa. September 5, 2018). It is a high standard. *Id* at 105.

In the request on September 1, 2021, Creeney proposed two possible accommodations. However, in the letter from her advocate dated September 22, 2021, the only accommodation requested regarding parking was a reserved accessible parking space closest to her unit and signage that the space was reserved. J-4.

² While Creeney testified to numerous other conditions that may constitute disabilities, the Commission does not address those since the Commission finds her to be disabled given her substantial limitation in the major life activity of walking.

At the hearing, Creeney initially testified that she needed an assigned space to ensure that she had a spot close to her apartment when she returned home. Tr. 42-4. However, on cross examination, Creeney testified that she believed there were two floors above hers in the parking garage. Tr. 81. She admitted that she was aware that there were additional handicap spaces on the first and third floors of the parking garage *and* that she was able to access those spaces as easily as the parking spaces on the second floor. Tr. 81-2. Creeney testified that the spaces on the first floor were always full. Tr.81. However, she admitted that she has never gone up to the third floor. *Id.* Creeney testified she never thought about whether there were any open spaces on the third floor and that she assumed that there were handicapped people up there. Tr. 82. Given that Creeney never actually investigated whether the handicap spaces on the third floor were available, the Commission finds that Creeney has not established that an assigned parking spot was necessary. Therefore, Creeney’s claim for a reasonable accommodation fails.

Creeney’s second claim was that Respondents discriminated against her by refusing to permit her to install permanent grab bars in the shower. Section 5(h) of the PHRA makes it an unlawful discriminatory practice for any person to

“Refuse to permit, at the expense of a person with a handicap, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises, except that, in the case of a rental, the landlord may, where it is reasonable to do so, grant permission for a modification if the renter agrees to restore the interior of the premises to the condition that existed before the modification, with reasonable wear and tear excepted.”

To establish a *prima facie* case of a refusal to permit a reasonable modification Creeney must show by a preponderance of the evidence that (1) she is a person with a disability; (2) Respondents knew or reasonably should have known that she is a person with a disability; (3) she requested permission to modify her dwelling; (4) the requested

modification may be necessary to afford her an equal opportunity to use and enjoy the dwelling; and (5) Respondents refused to permit her to make such modification. See *Hollis v. Chestnut Bend Homeowners Ass'n*, 760 F.3d 531, 541 (6th Cir. 2014)

Given that elements 1 and 2 are the same as discussed above pursuant to Creoney's reasonable accommodation claim, the Commission does not discuss them here. Regarding element 3, the evidence shows Creoney emailed Carelly on September 17, 2021, and requested the installation of a safety bar in the shower because the shower floor was slippery and her walker did not fit in the shower. J-3. Creoney also stated that she hoped this bar could prevent falls. *Id.* This email satisfied element 3. Carelly answered that day and informed Creoney that Respondents permitted the installation of plastic suction cup grab bars. *Id.*

On October 15, 2021, Creoney's advocate emailed Carelly and informed her that "[m]etal grab bars anchored into the shower's reinforced walls will be required to meet [Creoney]'s needs. Plastic grab bars will not provide the needed support and have the potential to damage the property." J-6. At the hearing, Carelly testified that she never spoke with Creoney about whether suction cup grab bars would satisfy her needs. Tr. 170. Additionally, Creoney testified that the maximum weight limit for suction cup grab bars that she looked at was 250 pounds and that she weighs 343 pounds. Tr. 75. Based on all the evidence, Creoney established that a permanent metal grab bar was necessary to allow her to enjoy the dwelling.

Finally, it is undisputed that Respondents refused to allow Creoney to install a permanent grab bar. The same day Creoney's advocate informed Carelly that a permanent reinforced grab bar would be needed to meet Creoney's needs, Carelly responded that her response would not change. J-6.

Since Creoney established all the elements of a prima facie case for failure to permit a

reasonable modification, the burden shifted to Respondents to establish that the request was unreasonable. To establish that the modification was unreasonable Respondents must show that they could not have granted the modification without imposing undue financial and administrative burdens or requiring a fundamental alteration in the nature of the housing. See *Hovsons, Inc. v. Twp. of Brick*, 89 F.3d 1096, 1104 (3d Cir. 1996).

At the hearing, Carelly testified that the decision whether to allow installation of permanent shower bars was not hers to make. Tr. 106. However, Carelly did know why the request was denied. She testified, “if Ms. Creeney were to move out, we would have to restore this back to its original state. So that would need to be completely retiled. So it would be an expensive endeavor.” Tr. 130. Carelly testified that the retiling would cost between \$3,000.00 and \$7,000.00. Tr. 172. When asked what 1400 Main’s annual budget is, Carelly testified that she did not know. Tr. 172.

The Commission finds the argument that the restoration would be expensive is unpersuasive because under both the PHRA and Creeney’s lease, Creeney would be responsible for the cost of restoring the unit to its original condition except for wear and tear. J.E. 1. Therefore, the Commission finds that the Respondents failed to establish that the modification was unreasonable.

Respondents also argue that they should not be liable because they offered Creeney the option to move to an accessible unit with permanent grab bars. However, this argument fails for several reasons. First, as discussed above, the only way Respondents can avoid liability is by showing that Creeney’s proposed accommodation was unreasonable. Additionally, Creeney testified credibly that the offer to move to an accessible unit did not occur until conciliation. Finally, Creeney testified that she and her husband would have to do the moving and it would be

very difficult. Tr.79. Thus, the Commission finds that the alternative accommodation offered by Respondents is not comparable to the requested modification and finds Creoney is entitled to damages on the reasonable modification claim. Accordingly, we move to consideration of an appropriate remedy.

Section 9(f)(1) of the PHRA provides in pertinent part:

If, upon all the evidence at the hearing, the Commission shall find that a respondent has engaged in or is engaging in any unlawful discriminatory practice as defined in this Act, the Commission shall state its finding of fact, and shall issue and cause to be served on such respondent an order requiring such respondent to cease and desist from such unlawful discriminatory practice and to take such affirmative action, including, but not limited to reimbursement of certifiable travel expenses in matters involving the complaint,... and any other verifiable, reasonable out-of-pocket expenses caused by such unlawful discriminatory practice, provided that, in those cases alleging a violation of Section 5(h)... the Commission may award actual damages, including damages caused by humiliation and embarrassment, as, in the judgment of the Commission, will effectuate the purposes of this act, and including a requirement for report of the manner of compliance.

The purpose of the remedy is not only to restore the injured party to her pre-injury status and make her whole but also to discourage future discrimination. *Williamsburg Cmty. Sch. Dist. V. Pa. Human Relations Comm'n*, 512 A.2d 1339 (Pa. Commw. Ct. 1986). In its post-hearing brief, the PHRC requests damages for humiliation and embarrassment in the amount of \$75,000-\$100,000 and a civil penalty of \$20,000.

In determining whether the evidence of emotional distress is sufficient to support an award, we must look at both the direct evidence of emotional distress and the circumstances of the act that allegedly caused the distress. *McGlawn v. Pa. Human Rels. Comm'n*, 891 A.2d 757, 777, 2006 Pa. Commw. LEXIS 13, *46 citing *United States v. Balistreri*, 981 F.2d 916 (7th Cir. 1992). Courts have held that the size of an intangible damage award is largely intuitive and is a matter over which the jury or the trial judge sitting without a jury has a great deal of discretion.

Laudon v. Loos, 694 F. Supp. 253, 255 (E.D. Mich. 1988). In *Cole v. Todd Toms, et. al.* PHRC # 202102052, the Commission summarized some of the most important factors it uses in determining an amount for emotional distress damages. (1) Whether Complainant suffered physical harm or threat of physical harm in addition to harm to their mental health; (2) The nature of the evidence offered to describe the harm (e.g. testimony by the Complainant, testimony by others, expert testimony); (3) Whether Complainant sought or otherwise received treatment for the injury; (4) Whether the discrimination was a single act or was ongoing; and (5) Whether the Complainant was particularly susceptible to being injured by discrimination due to their personal history.

The Commission finds that factors 1, 2, and 4 weigh in favor of awarding Creeneey a significant amount for emotional distress damages. Regarding physical harm, Creeneey testified that she has gotten some yeast infections under skin flaps and on her breasts and these can be painful. Tr. 61. For the second factor both Creeneey and her husband testified how the inability of Creeneey to shower regularly has negatively impacted their relationship. Creeneey testified that her husband has told her it is difficult to be attracted to her. Tr. 82-3. Complainant further testified that because of the inability to more frequently shower that her husband does not want to cuddle with her, let alone have sex with her. Tr. 60. Creeneey's husband testified there is not much intimacy between them which is a change from prior to the denial. Tr. 96. Creeneey's husband also testified about changes in Creeneey's behavior after the modification request was denied. He testified that Creeneey began sleeping almost 20 hours per day and that she had never exhibited that behavior in the time he had known her. Tr. 94. Finally, it's undisputed that Creeneey still did not have a permanent grab bar at the time of the hearing almost two years after filing the Complaint. Creeneey's husband testified that she still will not shower unless he is home. Tr.95.

For these reasons, the Commission finds that \$60,000.00 is an appropriate amount in emotional distress damages. The Commission also finds it appropriate to require Respondents to attend Fair Housing training within sixty (60) days of the date of this Order given Carelly's testimony that she hasn't received Fair Housing training since prior to August 2021. Tr. 138-9.

Turning to the civil penalties requested by Counsel for the Commission, Section 9(f)(2) of the PHRA provides in pertinent part:

Such order may also assess a civil penalty against the respondent in a complaint of discrimination filed under Sections 5(h) or 5.3 of this Act: (i) in an amount not exceeding ten thousand dollars (\$10,000) if the respondent has not been adjudged to have committed any prior discriminatory practice...".

When determining the amount of the civil penalty, the factors to consider are: "the nature and circumstances of the violation, the degree of culpability, any history of prior violations, the financial circumstances of that Respondent and the goal of deterrence, and other matters as justice may require." HUD v. Weber, P-H, Fair Hous.Fair Lend., §25,041 (HUD ALJ, 1993). Here, the evidence establishes that Respondents acted in a discriminatory manner when they refused to allow Creoney to install permanent grab bars in her shower and that almost two years later Creoney still did not have permanent grab bars. While the exact financial circumstances of Respondents are unknown, Carelly testified that the apartments are "somewhat high end." Tr. 131. The record also establishes that there are 376 units at 1400 Main. Tr.103. There is no evidence that the Respondents have a history of violations. Therefore, \$7,000.00 is the appropriate amount for the civil penalty. An order follows.

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AJH Management Company,	:	
Shay Carelly	:	
Respondents.	:	
	:	

RECOMMENDATION OF THE PERMANENT HEARING EXAMINER

Upon consideration of the entire record in the above-captioned matter, the Permanent Hearing Examiner finds that Creeney has proven that Respondents discriminated against her by refusing to allow her to make a reasonable modification to her apartment in violation of Section 5(h)(3.1) of the PHRA. It is, therefore, the Permanent Hearing Examiner's recommendation that the attached Findings of Fact, Conclusions of Law, and Opinion be approved and adopted. If so, approved and adopted, the Permanent Hearing Examiner further recommends issuance of the attached Final Order.

PENNSYLVANIA HUMAN RELATIONS COMMISSION

Darlene Hemerka

Darlene Hemerka, Hearing Examiner

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FINAL ORDER

AND NOW, this _____ day of _____, 2023, after a review of the entire record in this matter, the Pennsylvania Human Relations Commission, pursuant to Section 9 of the Pennsylvania Human Relations Act, hereby approves the foregoing Findings of Fact, Conclusions of Law, and Opinion of the Permanent Hearing Examiner. Further, the Commission adopts said Findings of Fact, Conclusions of Law, and Opinion into the permanent record of this proceeding, to be served on the parties to the Complaint and hereby

ORDERS

1. That 1400 Main Holdings LLC, AJH Management Company and Shay Carelly (Respondents) cease and desist from refusing to permit any tenant with a disability from making reasonable modifications to the unit at the tenant's expense and otherwise acting in a discriminatory manner against anyone seeking to lease a property from them.
2. That within sixty (60) days of the effective date of this Order, Respondents take Fair Housing Training.
3. That, within forty-five (45) days of the effective date of this Order, Respondents shall pay April Creeney the lump sum of \$60,0000, which amount represents compensatory

damages of embarrassment and humiliation Creeney suffered.

4. That, within forty-five (45) days of the effective date of this Order, Respondents shall deliver to PHRC Counsel, Robert Taylor, a check payable to the Commonwealth of Pennsylvania, in the amount of \$7,000.00, which represents an assessment of a civil penalty pursuant to Section 9(f)(2)(i) of the PHRA.
5. That, within 60 days of the effective date of this Order, Respondents shall report to the PHRC on the manner of their compliance with the terms of this Order by letter addressed to Robert Taylor, Assistant Chief Counsel, Pennsylvania Human Relations Commission, 301 Fifth Avenue, Suite 390, Pittsburgh, PA 15222.

PENNSYLVANIA HUMAN RELATIONS COMMISSION

BY: _____
M. Joel Bolstein
Chairperson

Attest:
