

May 9, 2024

By e-mail & U.S. Mail

Bhughes071461@yahoo.com

Brenda Hughes
7780 49th St. N #235
Pinellas Park, FL 33781

Re: Hughes v. Glen Ellen Mobile Home Park L.P., et al
HUD Case No. 04-22-2371-8; PC Case No. 22-053

Dear Ms. Hughes,

The Office of Human Rights has determined that there is reasonable cause regarding your case and received approval to pursue litigation on your behalf. Attached is a copy of your Determination letter. Currently all legal service providers are either at capacity or unable to accept your case. We are pursuing other options to obtain legal representation for you and will notify you once we do.

Though Pinellas County will provide legal representation for you, you are not required to accept this legal representation. You may choose to use your own private attorney to pursue your complaint. However, any private representation will be at your own expense, as Pinellas County will only pay for the legal representation, they have provided to you. In the event you decide to move forward with a private attorney, please notify the Office of Human Rights at (727) 464-4803.

Thank you for your patience.

Sincerely,

Betina Baron, Compliance Manager for Director Lorick

Jeffery Lorick
Director of Office of Human Rights

cc: Keiah Townsend
Attorney for Pinellas County Office of Human Rights

PLEASE ADDRESS REPLY TO:
Pinellas County Office of Human Rights
400 South Fort Harrison Avenue, 5th Floor
Clearwater, Florida 33756
PHONE: (727) 464-4880
FAX: (727) 464-4157
TDD: (727) 464-4062
pinellas.gov/department/office-of-human-rights



BRENDA HUGHES

v.

GLEN ELLEN MOBILE HOME PARK L.P.,
PENNY GARCIA – EQUITY LIFESTYLE PROPERTIES, INC.,
TIMERLINE CONSTRUCTION GROUP LLC, TIM LAGUDI – IEM,
SCOTT CAO – FLORIDA DEPARTMENT OF ECONOMIC OPPORTUNITY

HUD CASE NO. 04-22-2371-8

PC CASE NO. 22-053

DETERMINATION OF REASONABLE CAUSE, NOTICE OF FAILURE TO
CONCILIATE, AND CHARGE OF DISCRIMINATION

I. **JURISDICTION.**

Brenda Hughes, aggrieved person, filed a complaint of housing discrimination on the bases of disability, failure to make reasonable accommodation and failure to permit a reasonable modification with the Pinellas County Office of Human Rights (PCOHR) on August 5, 2022. PCOHR has been certified by HUD as substantially equivalent under federal law.

This Office, in conjunction with the Pinellas County Attorney's Office, has determined that reasonable cause exists to believe that a discriminatory housing practice has occurred in violation of the *Fair Housing Act Amendments of 1988 (FHAA)*, including, but not limited to, Section 804(f)(3)(A) and Section 804(f)(3)(B). Therefore, the issuance of this charge of discrimination has been authorized.

II. **SUMMARY OF ALLEGATIONS IN SUPPORT OF THIS CHARGE.**

Based upon the investigation of this complaint by the PCOHR, it has been determined that there is reasonable cause to believe Respondents engaged in unlawful discrimination on the bases of disability, failure to make reasonable accommodation and failure to permit a reasonable modification as evidenced by their continual delays in the installation of a ramp and subsequent plan change to a lift to accommodate Complainant's disability, despite Complainant's repeated requests. Respondents' delays have made housing unavailable to Complainant, resulting in her having to reside in temporary housing for fifteen (15) months. Based upon these actions, there is reasonable cause to believe the Respondent violated the *Fair Housing Act Amendments of 1988 (FHAA)*, including, but not limited to, Section 804(f)(3)(A) and Section 804(f)(3)(B).

We actively use feedback to constantly improve our delivery and provide you with the best possible service. Please share your feedback with us in this quick survey.

<https://www.surveymonkey.com/r/OHRCustomerSatisfaction>

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III. **FINAL INVESTIGATIVE REPORT.**

The information supporting this reasonable cause determination and charge is more specifically contained in the investigator's Final Investigative Report (FIR) completed for this complaint. A copy of the FIR will be provided to any aggrieved person and any respondent upon written request filed with Jeffery Lorick, Director, Pinellas County Office of Human Rights, 5th Floor, 400 S. Ft. Harrison Ave., Clearwater, FL 33756, telephone number (727) 464-4880.

IV. **FAILURE TO CONCILIATE.**

The Office of Human Rights offered to conciliate this complaint throughout the pendency of our investigation, and prior to our issuance of this determination, pursuant to Pinellas County Codes, §§ 70-145, 147. Based on our records, the parties either failed to volunteer to participate in conciliation, or such efforts were unsuccessful.


V. **CONCLUSION.**

Wherefore, based upon the above, the PCOHR, in conjunction with the Pinellas County Attorney's Office, and pursuant to *Pinellas County Code*, Sec 804(a) or (f), issues this charge of reasonable cause to believe that the Respondent engaged in unlawful housing discrimination on the bases of disability, failure to make reasonable accommodation and failure to permit reasonable modification, in violation of the *Fair Housing Act Amendments of 1988 (FHAA)*, including, but not limited to, Section 804(f)(3)(A) and Section 804(f)(3)(B), and will pursue such relief on behalf of the aggrieved person as may be appropriate under the applicable fair housing laws and ordinances.

Respectfully submitted,



Jeffery Lorick, Director
Pinellas County Office of Human Rights



Jewel White, County Attorney
Pinellas County, Florida
315 Court Street, Sixth Floor
Clearwater, FL 33756
Phone: (727) 464-3354

DATE: 5-9-24