

Discrimination Complaint Statement

St. Raphael's Congregation and Forward Management, Inc. unlawfully discriminate against residents, and housing applicants, on the basis of religion and non-religion. St. Raphael's Congregation owns the Lumen House, which is an apartment building located at 142 W. Johnson St. in Madison. Forward Management, Inc. manages the property and leases the property to tenants.

The Lumen House charges \$100 less in rent if tenants receive approval by the Roman Catholic Church and participate in qualifying Roman Catholic Church religious programming. In order to secure the \$100 monthly discount, a Catholic priest, Father Eric Nielsen must approve of the tenant's discount. Once approved, tenants turn in their rental discount "scholarship" forms to Forward Management.

Exhibit 1 is a true and correct copy of a "Lumen House Rent Scholarship Application" that was provided by a representative of Forward Management, Inc. The application asks, "Are you a member of St. Paul University Catholic Center?" The application asks residents to "describe your involvement at St. Paul's, and include any participation in the service and ministry activities listed below." The application also requires approval by Father Eric Nielsen of St. Paul University Catholic Center.

According to the "Lumen House Apartments Rent Scholarships Information" document that was included with the application: "Rent scholarships (reduction) of \$100 per month per tenant are available to those active at St. Paul University Catholic Center, on recommendation of Fr. Eric Nielsen." The information sheet lists pricing for rentals and states, "the \$100 rent scholarships would be deducted from these published rates."

St. Raphael's Congregation has publicized the availability of reduced rent for Catholic students. For example, a Catholic Herald article from Aug. 28, 2014 said, "Lumen House supports the ministry of St. Paul University Catholic Center by offering rent scholarships to students active there." See Exhibit 2. The church's website includes the same statement and also links to the "Lumen House Rent Scholarship Application" document and the "Lumen House Apartments Rent Scholarships Application" document. See Exhibit 3 (available online at: <http://www.isthmuscatholic.org/lumen-house>).

Forward Management or other agents for St. Raphael's Congregation have posted advertisements on Craigslist promoting reduced-rent for "qualified candidates." Upon information and belief, a Craigslist ad for a Lumen House apartment was posted on or about July 8, 2016, which said, "Scholarships offered from St. Paul's to qualified candidates."

Nicole Niebler currently rents an apartment in Madison and has considered renting a new apartment beginning in August of 2017. Ms. Niebler viewed the Lumen House apartments on October 7, 2016 and was given a tour of the apartment building by Tammy Lange, who manages the property for Forward Management.

Ms. Niebler understands that the Lumen House offers a \$100 monthly discount to students who are approved by St. Paul University Catholic Center. Ms. Niebler is an atheist and is

unwilling to attend religious worship services of the Roman Catholic Church or to participate in Catholic Church programs. Ms. Niebler is unwilling to apply for reduced rent by submitting a request to a Catholic priest.

In addition, Forward Management, Inc. and St. Raphael's Congregation distinguish between prospective tenants on the basis of student status. The Lumen House has a quota to rent 10% or less of the units to persons who are not UW-Madison students. Forward Management representatives ask prospective tenants about their student status.

Once the 10% quota of non-UW students has nearly been reached, Forward Management refuses to rent to non-students. A Lumen House ad posted on Craigslist in June said, "Due to City of Madison restrictions the last few remaining apartments must be leased to UW Students."

Ms. Niebler anticipates graduating from UW-Madison in May of 2017. Based on the Lumen House student quota, she is limited in signing a lease or lease renewal for a Lumen House apartment as a non-student.

St. Raphael's Congregation and Forward Management have violated Madison's Equal Opportunities Ordinance, including Ord. 39.03(4)(a), (c), (d) and (g) by providing and advertising discriminatory rental rates on the basis of religion, non-religion, and student status.

Respectfully submitted,

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