

July 17, 2017
~~September 19, 2017~~

Final Investigative Report

Case Name: Donna Pitman & Frank Owen v. Lake Placid Park, Inc.

Case Number: 04-17-7118-8

I. Jurisdiction

A complaint was filed with HUD on February 16, 2017 alleging that the complainant(s) was injured by a discriminatory act. It is alleged that the respondent(s) was responsible for: Discriminatory terms, conditions, privileges, or services and facilities; and Failure to make reasonable accommodation. It is alleged that the respondent(s)'s acts were based on Handicap. The most recent act is alleged to have occurred on January 27, 2017, and is continuing. The property is located at: Lake Placid Park, Inc. , 980 7th Street NW #1, Largo, FL 33770. The property in question is not exempt under the applicable statutes. If proven, the allegation(s) would constitute a violation of Sections 804b or f, and 804f3B of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

It is not known if the respondent(s) receive federal funding.

II. Parties and Aggrieved Persons

A. Complainant(s)

Donna Pitman
980 7th Street NW
Largo, FL 33770

Frank Owen
980 7th Street NW
Largo, FL 33770

Complainant Allegations

Donna Pitman (CP Pitman) a disabled female with a service dog who resides at 980 7th St. NW, Largo, FL 33770 with partner Frank Owens (CP Owens). The property is owned by Lake Placid Park, Inc. (R). Bibi Hussein, Secretary (R Hussein)

CP Pitman states in July 2016, CP Owens purchased Lot 1 with a mobile home on it at Lake Placid Park in hopes of having a relaxing second home, however, it's been everything except relaxing and enjoyable. CP states on July 16, 2016 she provided all documents required for the approval of her support animal. Per the HOA CP placed all the documents in the outside drop box at the clubhouse. R's notified CP that she would need to be added as a 2nd resident if she would be staying more than 30 days out of the year. CP Pitman interviewed with the HOA on September 09, 2016 and was approved to be the 2nd resident. The HOA approved for her to become a 2nd occupant. During this interview CP Pitman states she asked about support animals on the property and she was told that the HOAs attorney was amending the rules to allow support animals.

CP Pitman states there were 3 separate votes to decide if the HOA would approve the support animal. During the HOA meeting on December 12, 2016, the HOA approved CP Pitman's support animal. CP Pitman states on December 16, 2016 as she was in route to the Largo property from her residence 9 hours away, she received a call from R Hussein stating that CP Pitman's support animal would not be allowed on the property. R Hussein told CP Pitman she would need to find other accommodations for her support animal before she comes to the park. Per the

approval of the HOA on the 12th of December, CP Pitman proceeded to go to the property with her support animal. On December 19, 2016, HOA called another meeting where they decided to rescind the previous approval for CP Pitman's support animal. R's stated they were not convinced that the letters were legit and additional information would be required from CP Pitman's physician. R's informed CP Pitman they would turn their eye to her support animal being on the property for the holidays, but she will not be allowed to bring him back after the holidays.

CP states the R's have made her feel humiliated by broadcasting her personal health issues and making it a spectacle of entertainment to all of the neighbors at the meetings. CP states some neighbors won't even speak to her after all of this occurred. CP Pitman also feels she is being harassed by the numerous memos that are being sent to her as well as other neighbors about her support animal. The most recent by the R's attorney on January 27, 2017.

On December 30, 2016, CP Pitman returned to the property, she stayed until January 3, 2017. During CP Pitman's visit, she was unable to completely enjoy herself due to the emotional stress and grief she felt by not having her support animal there with her. CP Pitman's support animal has a calming effect on her.

On 5/30/2017, the complainants amended their complaint of discrimination to include the following:

During the investigation, another note from the complainant's doctor was provided to the respondent to justify the presence of the animal. Despite this further information, the respondent continued to deny the approval of the animal as an accommodation.

CP believes that the Respondent's actions constitute a violation of the Fair Housing Laws.

B. Other Aggrieved Persons

C. Respondent(s)

Bibi Hussein
Lake Placid Park, Inc.
Secretary
980 7th Street NW
Largo, FL 33770

Lake Placid Park, Inc.
980 7th Street NW
Largo, FL 33770

Respondent Defenses

In the instant matter, Ms. Pitman's charge of discrimination is apparently based on allegations that she suffers from a disability recognized under the Fair Housing Act and is in need of a reasonable accommodation in order to use and enjoy the premises. However, Ms. Pitman has not submitted any reliable medical documentation evidencing that she suffers from a handicap or disability under the Fair Housing Act that makes it necessary for her to have a service or support dog in violation of Respondents' Rules and Regulations.

The Park is unable to state that Ms. Pitman is disabled. A letter purchased from an on-line website that advertises to write housing and air transit letters is insufficient to establish a disability, just as the tags and certificates are that are purchased on-line. Further, the letter from Dr. Booker states that Ms. Pitman suffers from adjustment disorders with depressed mood and anxiety. A diagnosis does not equate to a disability. Moreover, the letter does not state which of Ms. Pitman's major life activities are impaired or explain how the animal ameliorates the effects of her alleged disability. Accordingly, Ms. Pitman is unable to establish that she suffers from a disability, that the Park knew or should have known that she suffers from a disability or that the animal was necessary to allow her to use and enjoy the property.

Further, and most importantly, the Park never denied the request for accommodation. Instead, the Park permitted the animal while requesting additional information and engaging in the interactive process. A second letter was drafted requesting better documentation in response to the letter from Dr. Booker. The Park was unable to send that letter because Ms. Pitman hastily filed this complaint and unilaterally terminated the interactive process.

Ms. Pitman was in no way harassed by anyone. The Board clearly wanted to do what was correct and proper under the law as evidenced by the approval of the animal on December 12, 2016. It was only after the Board determined that the letter and tags were purchased on-line that they rescinded the approval. Even more telling is the fact that the Board did not deny the request at that time, but instead, it engaged in the interactive process to try to obtain better documentation just as it would have done in response to Dr. Booker's letter. Ms. Pitman appears to be accusing Ms. Bibi Hussein, the Board's former secretary, of improper conduct. However, Ms. Hussein voted to approve the animal on both December 12th and the 19th. In fact, it was Ms. Hussein who advised Ms. Pitman that the animal could remain on the property for the holidays despite the lack of proper documentation.

The Park has only received three requests for accommodations for service or support animals in the last seven years, with Ms. Pitman's being one of them. The first was the request' referenced above from Mr. Crawford. The Park requested proper documentation and he filed a HUD complaint. The Park acted properly. There was also a request made by an owner who has since passed away. She did not provide any medical statement at the time of her request. She was asked to do so and she decided not to pursue her request.

Because Ms. Pitman has not and cannot set forth any of the elements necessary to establish a prima facie case for disability discrimination, her charges, along with Mr. Owens', under the Fair Housing Act and Pinellas County Human Rights Ordinance are without merit and a determination of "no cause to believe discrimination occurred" is warranted.

In light of the 5/30/2017 amendment, the respondent stated the following:

As the amendment involves only the second to last paragraph of the Complaint, this response will only address that paragraph. The Respondents' Position Statement, dated March 20, 2017, remains operative for the remainder of the original Complaint.

Regarding the amendment, Respondents state that the additional note from Complainant's physician, which was first submitted after the initial Complaint was filed, fails to provide the information necessary for Respondents to make an informed decision on the request for accommodation as this letter fails to address which of Complainant's Major Life Activities are impaired. As such, the Letter fails to support the request. The Respondents would entertain a letter that addresses the required information.

D. Witnesses

Suzy Pierce

III. Case Summary

A. Interviews

Complainant Pitman, Donna
Date of Interview: February 16, 2017
Type of Interview: Internet
Interviewer: Taylor, Ronisha C.

Donna Pitman (CP Pitman) a disabled female with a service dog who resides at 980 7th St. NW, Largo, FL 33770 with partner Frank Owens (CP Owens). The property is owned by Lake Placid Park, Inc. (R). Bibi Hussein, Secretary (R Hussein)

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CP Pitman states there were 3 separate votes to decide if the HOA would approve the support animal. During the HOA meeting on December 12, 2016, the HOA approved CP Pitman's support animal. CP Pitman states on December 16, 2016, as she was in route to the Largo property from her residence 9 hours away, she received a call from R Hussein stating that CP Pitman's support animal would not be allowed on the property. R Hussein told CP Pitman she would need to find other accommodations for her support animal before she comes to the park. Per the approval of the HOA on the 12th of December, CP Pitman proceeded to go to the property with her support animal. On December 19, 2016, HOA called another meeting where they decided to rescind the previous approval for CP Pitman's support animal. R's stated they were not convinced that the letters were legit and additional information would be required from CP Pitman's physician. R's informed CP Pitman they would turn their eye to her support animal being on the property for the holidays, but she will not be allowed to bring him back after the holidays.

CP states the R's have made her feel humiliated by broadcasting her personal health issues and making it a spectacle of entertainment to all of the neighbors at the meetings. CP states some neighbors won't even speak to her after all of this occurred. CP Pitman also feels she is being harassed by the numerous memos that are being sent to her as well as other neighbors about her support animal. The most recent by the R's attorney on January 27, 2017.

On December 30, 2016, CP Pitman returned to the property, she stayed until January 3, 2017. During CP Pitman's visit, she was unable to completely enjoy herself due to the emotional stress and grief she felt by not having her support animal there with her. CP Pitman's support animal has a calming effect on her.

CP believes that the Respondent's actions constitute a violation of the Fair Housing Laws.

Complainant Pitman, Donna
Date of Interview: March 30, 2017
Type of Interview: Telephone
Interviewer: ESPARZA, MARK S

Call to the complainant on this date. The cp was told that the sufficiency of her doctor's note would be the central issue to her case. She stated she went to the on-line doctor after discussing the issue with her treating physician, saying he told her people used the internet. She stated she obtained the dog on January 2, 2015. She added that her neighbor told her they had voted to approve the animal.

Complainant Owen, Frank
Date of Interview: April 26, 2017
Type of Interview: Telephone
Interviewer: ESPARZA, MARK S

Call to Owens on this date. He believed the respondent had informally voted to approve the dog in September. Owens confirmed the cp had been approved as an occupant, but that they did not like it when she came down with the dog. He stated she had come down in September, and that it was believed her dog had gone to the bathroom in a yard. However, stated Owens, it turned out it had been a raccoon. He knew it was from a raccoon due to the way it was formed, He stated the first vote was to approve the dog, 9-2, but then reversed it with a 7-2 votes. He stated that the lawyer was understood to have said the paperwork was not in order. The the board then voted 7-2 to rescind the approval. Regarding who was leading the opposition, Owen stated it was Mike, who was president last year. Owens confirmed they had told the cp not to come down if the Owens, the owner of the unit, were not present. Owens

confirmed his sisters had visited without him, saying that as a 2nd occupant, the cp should be allowed to come down alone. Owens also stated that BiBi had told the cp not to bring the dog over when she was driving down, and that they were told she could keep the animal over the holidays but not to bring it back.

Other Witnesses Pierce, Suzy
Date of Interview: April 26, 2017
Type of Interview: Telephone
Interviewer: ESPARZA, MARK S

Call to witness Suzy Pierce where a voicemail left requesting a return call.

Other Witnesses Pierce, Suzy
Date of Interview: May 02, 2017
Type of Interview: Telephone
Interviewer: ESPARZA, MARK S

Call to witness Suzy Pierce where a voicemail left requesting a return call.

Complainant Pitman, Donna
Date of Interview: May 02, 2017
Type of Interview: Email
Interviewer: ESPARZA, MARK S

Email to the cp informing her that her witness had not responded to the investigator's voicemail's requesting contact. The cp replied they had not spoken much since not being at the park. She believed Suzy was scared of the HOA, and did not want problems. She was told her most recent noted, when read with the other two, could be sufficient information.

Other Witnesses Pierce, Suzy
Date of Interview: May 03, 2017
Type of Interview: Telephone
Interviewer: ESPARZA, MARK S

Call to witness Suzy Pierce where a voicemail left requesting a return call.

Respondent Representative Lofaro, Bennett
Date of Interview: May 09, 2017
Type of Interview: Email
Interviewer: ESPARZA, MARK S

Email sent to the respondent's attorney indicating the deadline had passed, and that all three notes were to be read together. He replied he was still checking with the respondent.

Complainant Pitman, Donna
Date of Interview: May 10, 2017
Type of Interview: Email
Interviewer: ESPARZA, MARK S

Email to the cp indicating the respondent had yet to reply, but that a possible next step would be to amend the complaint to include the most recent doctor's note.

Respondent Representative Lofaro, Bennett
Date of Interview: May 18, 2017

Type of Interview: Telephone
Interviewer: ESPARZA, MARK S

Return call from the respondent's attorney who stated he had yet to receive an answer from his client.

Complainant Owen, Frank
Date of Interview: June 27, 2017
Type of Interview: Telephone
Interviewer: ESPARZA, MARK S

Return call to Frank Owens who complained the investigation was taking too long. When asked if they would like the investigator to contact the park to get a temporary accommodation pending the investigation, as the cps had been wanting to visit the park, the cp declined, stating they had already made other plans.

B. Documents

Nature of Document: respondent request letter to cp
Who Provided: respondent attorney
How Transmitted to HUD: mail
Date of Document: January 24, 2017
Date Obtained: February 03, 2017

Letter from respondent to cp requesting more information

Nature of Document: Pitman ESA certificate
Who Provided: complainant
How Transmitted to HUD: mail
Date of Document: June 07, 2016
Date Obtained: February 03, 2017

Nature of Document: 2nd Doctor note
Who Provided: complainant
How Transmitted to HUD: mail
Date of Document: January 18, 2017
Date Obtained: February 03, 2017

Initial doctor's note

Nature of Document: Original doctor note
Who Provided: complainant
How Transmitted to HUD: mail
Date of Document: June 13, 2016
Date Obtained: February 03, 2017

Second dr.'s note

Nature of Document: Signed Complaint
Who Provided: Donna Pitman & Frank Owen
How Transmitted to HUD: Mail-In
Date of Document: February 16, 2017
Date Obtained: February 16, 2017

Nature of Document: respondent answer
Who Provided: respondent attorney
How Transmitted to HUD: email
Date of Document: March 20, 2017
Date Obtained: March 20, 2017

respondent's answer

Nature of Document: cp rebuttal
Who Provided: complainant
How Transmitted to HUD: email
Date of Document: April 11, 2017
Date Obtained: April 11, 2017

Nature of Document: 3rd doctor note
Who Provided: complainant
How Transmitted to HUD: email
Date of Document: April 07, 2017
Date Obtained: April 11, 2017

Nature of Document: cp rebuttal
Who Provided: complainant
How Transmitted to HUD: email
Date of Document: April 11, 2017
Date Obtained: April 11, 2017

Nature of Document: email communication with complainant
Who Provided: complainant
How Transmitted to HUD: email
Date of Document: March 27, 2017
Date Obtained: April 19, 2017

Nature of Document: 100 day letters
Who Provided: PCOHR
How Transmitted to HUD: In-person
Date of Document: May 26, 2017
Date Obtained: May 26, 2017

Nature of Document: Licensing information for note providers
Who Provided: PCOHR
How Transmitted to HUD: Internet
Date of Document: May 26, 2017
Date Obtained: May 26, 2017

Nature of Document: amended complaint of discrimination
Who Provided: complainant
How Transmitted to HUD: email
Date of Document: May 30, 2017
Date Obtained: May 30, 2017

amended complaint of discrimination

Nature of Document: Notice of amended charge documents
Who Provided: PCOHR

How Transmitted to HUD: In-person
Date of Document: June 13, 2017
Date Obtained: June 13, 2017

Notice of the complaint notices sent to the parties. The original notice was incorrectly sent to the original respondent attorney, and not the current respondent attorney. Thus, on 6/30/17, the notices of the amended charge were sent to the correct respondent attorney. The response due date had to be changed from 6/27 to 7/10.

Nature of Document: complainant case communication emails
Who Provided: cp
How Transmitted to HUD: email
Date of Document: June 20, 2017
Date Obtained: June 20, 2017

Emails from the cp complaining of her inability to visit the complex

Nature of Document: Informational emails to the cp
Who Provided: PCOHR
How Transmitted to HUD: email
Date of Document: June 27, 2017
Date Obtained: June 27, 2017

Email explaining current status and process sent to the cps concerning their case, and concerns.

Nature of Document: respondent answer to amended complaint
Who Provided: respondent attorney
How Transmitted to HUD: email
Date of Document: July 10, 2017
Date Obtained: July 10, 2017

respondent response to amended complaint.

Nature of Document: determination
Who Provided: PCOHR
How Transmitted to HUD: In-person
Date of Document: July 16, 2017
Date Obtained: July 16, 2017

determination

Nature of Document: Pre-determination Cause leaning letter
Who Provided: PCOHR
How Transmitted to HUD: In-person
Date of Document: July 18, 2017
Date Obtained: July 18, 2017

Letters sent to the parties stating the PCOHR was leaning cause, and giving a final opportunity to conciliate.

C. Interrogatories

Interrogatory Sent To: complainant
Interrogatory Sent Date: March 21, 2017
Interrogatory Returned Date:

March 21, 2017

Donna Pitman & Frank Owen
Sent by email: donnapitman@hotmail.com

Re: Donna Pitman & Frank Owens v. Lake Placid Park, Inc./Bibi Hussein
Case numbers: PC-17-016/HUD: 04-17-7117-8

Dear Ms. Pitman & Mr. Owen:

My name is Mark Esparza and I am an Investigator with the Pinellas County office of Human Rights. I have been assigned to investigate the above styled Charge of Discrimination. The Respondent's statement has been received from the respondent and enclosed for your review.

1. **If you disagree with the Respondent's statements, you must now:**
 - a. State, in writing, what you disagree with and what you believe the truth to be. (If the information has already been provided to the Department, please refer to it **specifically** and **clearly** so that it may be incorporated);
 - b. Provide evidence in the form of documents and/or witness statements that support what you believe the truth to be;
 1. Documents that support your belief but are not within your ability to obtain must be identified.
 2. Witnesses who need to be interviewed by the Investigator must be identified by their name and contact information.
2. If you would like, you may **bring your written response** to the Department and meet with the Investigator to discuss your case. Please contact the Investigator at (727) 464-4801 to schedule an appointment. This must be done within the time frame to submit your responses to this summary.
3. Should you wish to make a conciliation proposal for consideration by the other side, please contact mediator Stacy Perakis at 813-498-1855.
4. In addition, please answer the following questions:
 - a. When did you obtain the animal?
 - b. What is the condition that requires the animal, when was this initially diagnosed, and by whom?

Return all of the above information as soon as possible, but no later than Tuesday, April 4, 2017.

Sincerely,

A copy of the respondent's answer, along with the DOJ/HUD joint memo on Reasonable Accommodations was sent to the cp. The cp did not provide a rebuttal.

Interrogatory Sent To: respondent attorney
Interrogatory Sent Date: April 03, 2017
Interrogatory Returned Date:

The respondent's attorney was asked if the association had actually voted 3x times. The respondent's attorney replied on 4/4/17, stating he was still unsure if he were counsel to the respondent, but once known, would reply.

Interrogatory Sent To: respondent's attorney Lofaro
Interrogatory Sent Date: April 26, 2017
Interrogatory Returned Date: May 23, 2017

From: Esparza, Mark S
Sent: Wednesday, April 26, 2017 2:16 PM
To: 'Bennett Lofaro' <blofaro@boydgroup.com>
Subject: RE: Donna Pitman v. Lake Placid Park, PC-17-016

Well, time is running out, so I must press on. I have attached the complainant's most recent doctor's note. If acceptable, let me know asap to see if we can get this resolved now. Mr. Owens would like to come down this

weekend, thus, if possible, let me know before Friday.

In addition to the above, please provide the following information:

1. The complainant states she submitted her original doctor's note using the respondent drop box, on or about 7/16/2016. Is this accurate?
2. In light of the above, why did it take the respondent nearly 6 months to ask for further information?
3. The complainant states the respondent had three votes on whether to approve her assistance animal. Is this accurate?
4. Please specify the dates of all votes to approve the complainant's assistance animal.
5. The complainant states that Bibi called her on 12/16/16, to instruct the complainant not to bring the animal to the property, prior to the 12/19/16 vote. Is this accurate?
6. What exactly changed or transpired between 12/12/16, and 12/19/16, to generate a re-vote of the approval?

On 5/23/17, the respondent's attorney replied with:

From: Bennett Lofaro [mailto:blofaro@boydlawgroup.com]

Sent: Tuesday, May 23, 2017 4:03 PM

To: Esparza, Mark S <mesparza@co.pinellas.fl.us>

Cc: Burnett, JoAnn <JBURNETT@bplegal.com>; LaShann R. Sledge <lsledge@boydlawgroup.com>

Subject: Donna Pitman v. Lake Placid Park, PC-17-016

Hi Mark,

The answers to the questions raised in your April 26, 2017 e-mail appear below. The second letter from Dr. Booker continues to suffer from the same deficiencies as his first letter. For instance, the second letter does not state which major life activities of Ms. Pitman are substantially impaired, nor does it explain how the dog ameliorates the effects of her disability. The Park never had the opportunity to address the deficiencies in Dr. Booker's first letter with Ms. Pitman, and continue the interactive process with her, as she filed her Complaint shortly after submitting the first letter. Any finding by the FCOHR must be based on the documentation provided by Ms. Pitman to the Park as of the time the Complaint was filed (February 10, 2017). The Park continues to be open to considering any additional relevant and competent medical documentation that Ms. Pitman may submit, however the documentation submitted to date remains deficient.

If you have any questions, please let me know.

In addition to the above, please provide the following information:

1. The complainant states she submitted her original doctor's note using the respondent drop box, on or about 7/16/2016. Is this accurate? Ms. Pitman submitted the request in July 2016. However, the Association had no information about Ms. Pitman because she is not an owner and was not an approved occupant. The Association requested information so it could approve her as an occupant before addressing the request for an accommodation. Again, Ms. Pitman visits the property occasionally but does not reside on the property full time so she was not denied the dog. The Association continued to request documentation to establish Ms. Pitman's age for verification purposes which still has not been provided. Despite that, the Association completed a skype interview with Ms. Pitman and approved her occupancy.
2. In light of the above, why did it take the respondent nearly 6 months to ask for further information? As explained in the position statement, the Association did not have a lot of experience with requests for accommodations so it sought advice from counsel. A reasonable accommodation policy was created and upon completion (with all revisions), it was adopted and sent to Ms. Pitman.
3. The complainant states the respondent had three votes on whether to approve her assistance animal. Is this accurate? No, the Association had a vote to approve Ms. Pitman as a second occupant in September 2016. This vote did not address the support dog. On December 12, 2016 the Board voted to approve Ms.

Pitman's support dog. However, the Board had sent the letter for counsel's review prior to the Board meeting but a response was not provided until after the meeting. Without disclosing attorney-client privileged communications, it was determined that the letter in support of the requested accommodation was from "Spring Eternal" authored by Dr. Mariechia Palmer from Oklahoma City, Oklahoma. A copy of the letter is attached to the position statement.

The letter is undated but appears to state that it is effective for the period June 13, 2016 – June 12, 2017. Since Ms. Pitman is from South Carolina and the medical professional is from Oklahoma, the Park was skeptical of the request and began researching the issue. Additionally, Ms. Pitman provided an identification tag and Registration Certificate form the U.S. Animal Registry dated June 7, 2016. No approval letter was ever sent to Ms. Pitman because on December 19, 2016, the board voted to rescind the approval and to turn the matter over to counsel. Copies of the Board Minutes for December 12, 2016 and December 19, 2016, were attached to the position statement.

Due to the overwhelming fraud and abuse in this area, research was conducted on the medical provider and the tag and certification and it was determined that the tag and certification are the type that can be purchased by anyone on-line from a number of different websites for a fee. The websites contain disclaimers that they have done no independent research, nor have they verified the information provided by the purchaser. These tags and certificates are insufficient to establish that a person is disabled or that an animal is a service or support animal.

Moreover, as stated above, the letter from Dr. Palmer raised concerns because of her location, the "one year duration" of the letter and the fact that the letter states Dr. Palmer made her assessment "[a]ccording to an initial screening and consultation on 13 June, 2016". The letter goes on to state that based upon this initial screening, Ms. Pitman has a mental health disorder defined in the DSM-5. The letter states that the condition limits at least one major life activity but does not state which major life activity(ies) is impaired, which is required in order to determine if there is a nexus. Further, the letter fails to state how the animal ameliorates the effects of the condition. FCHR has previously determined that letters that are paid for on-line are not acceptable.

The letter states that Ms. Pitman registered her pet with the "Emotional Support Animal Registration of America, which further substantiates her need for and commitment to an ESA". Ms. Pitman did not provide this registration, but as stated above, since there is no recognized service or support animal registry, this registration would have been of no assistance either. Accordingly, the letter did not provide the necessary information to establish a disability related need for the animal under the Florida or Federal Fair Housing Acts.

Moreover, research regarding ESA Registration of America, as mentioned by Dr. Palmer in her letter, revealed that Spring Eternal is associated with this registry. The on-line application states:

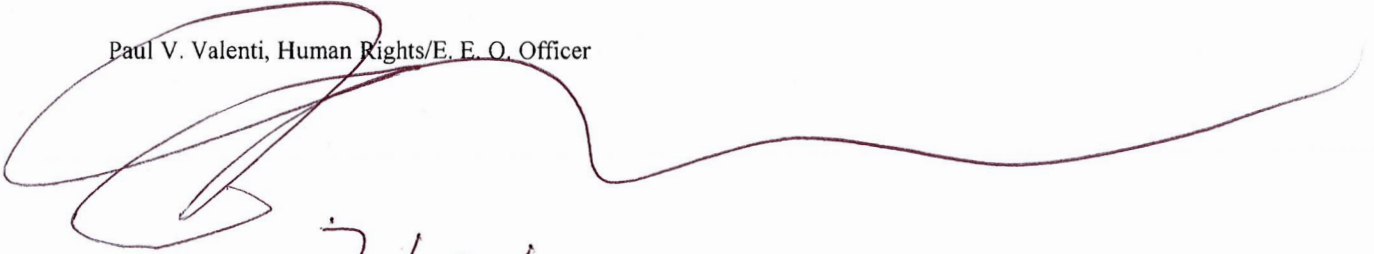
WELCOME! Please complete the following assessment questions before your Phone Evaluation for your Emotional Support Animal (ESA) Letter.

SPRING Eternal is the Contracted Mental health Provider for Emotional Support Animal Registration of America
www.ESAreistration.org

1. Please specify the dates of all votes to approve the complainant's assistance animal. December 12, 2016 was the only vote to approve the animal. As stated above, Ms. Pitman was approved as an occupant of the unit in September 2016 but the support animal was not addressed at that vote. There was a vote to rescind the approval on December 19, 2016 after it was determined that the letter provided was paid for.
2. The complainant states that Bibi called her on 12/16/16, to instruct the complainant not to bring the animal to the property, prior to the 12/19/16 vote. Is this accurate? Bibi did contact Ms. Pitman and initially advised her the animal should not be brought to the property but expressly told her she could bring the animal for the December/January visit.
3. What exactly changed or transpired between 12/12/16, and 12/19/16, to generate a re-vote of the approval? Again, after conducting research on the author of the letter, it was determined that the letter was paid for from an on-line website that conducts an "assessment" after an on-line exam. FCHR has

previously concluded that these letters are unacceptable, as have many of the HUD local equivalent agencies.

Paul V. Valenti, Human Rights/E. E. O. Officer

A large, stylized handwritten signature in dark red ink, consisting of several overlapping loops and a long horizontal tail extending to the right.

7/17/17