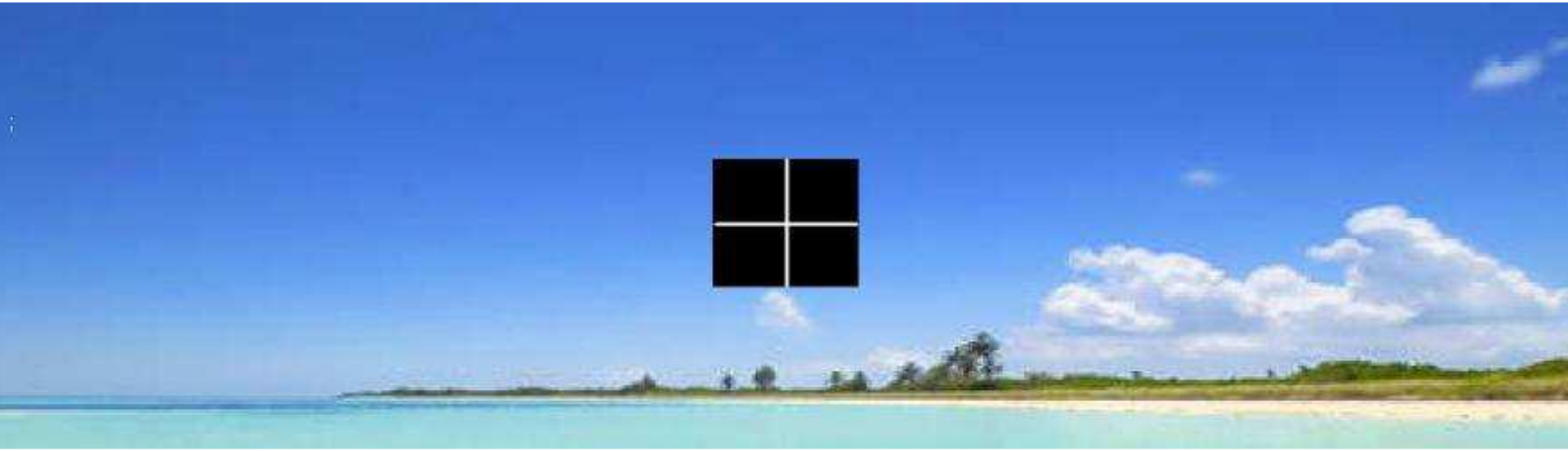

Space Coast Communities Association

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18 November 2026

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Navigating the Federal Fair Housing Act: Assistance Animal or Pet?

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FFHA: Assistance Animal or Pet?

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Alan Schwartzseid, a Board Certified Specialist in Condominium and Planned Development Law, obtained a B.A. from the University of Florida in 2004, a M.S. in International Business from Florida Atlantic University in 2005, and a J.D. from Nova Southeastern University in 2008. Mr. Schwartzseid initially practiced mortgage foreclosure law, and in 2010, joined Kaye & Bender n/k/a Kaye Bender Rembaum to concentrate in the area of community association assessment collection. In 2014, Mr. Schwartzseid left that employ to manage the collection department of Weiss Serota Helfman Cole & Bierman, and in 2018, moved to Central Florida where he spent several years as managing collection attorney and general community association counsel to over 500 communities, with Clayton & McCulloh, P.A.

In August 2022, Mr. Schwartzseid proudly returned to Kaye Bender Rembaum as a Firm Member and managing attorney of the firm's Orlando-area office in Winter Springs, Florida, where he assists clients in all facets of community association law (including points north of office location). Mr. Schwartzseid is a member of the Condominium Committee of the Real Property Section of The Florida Bar and authored several chapters of the Homeowners' Association and Condominium law books now pending publication via that Committee. He serves as Co-chair on its CLE development Subcommittee and was also appointed a member of the SB-4D Task Force by that Committee. Mr. Schwartzseid regularly lectures on Community Association law, is a Florida Supreme Court Certified County and Circuit Civil Mediator and focuses his mediation practice on community association-related disputes.

Policy & Enforcement

It is the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States.

The Department of Justice ("DOJ") and the Department of Housing and Urban Development ("HUD") are jointly responsible for enforcing the Federal Fair Housing Act ("FHA").

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The Fair Housing Act

In general, the FHA prohibits discrimination in housing on the basis of:

- Race
- Color
- Religion
- Sex
- National Origin
- Familial Status (age)
- Disability

Check state and local ordinances, too…

Part II of Chapter 760, Florida Statutes, is Florida's version of the FHA and is enforced by the Florida Commission on Human Relations.

Local Ordinance Example: under Palm Beach County's Code, discrimination is prohibited on the basis of:

- Sexual Orientation
- Age
- Marital Status
- Gender Identity or Expression

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U.S. Code vs. The CFR

U.S. Code

- The United States Code ("U.S. Code") contains statutes enacted by Congress.
- Certain laws may contain "enabling legislation" that create governmental agencies who are vested with the authority to create rules and regulations by following a legislatively created administrative process that provides for both notice to the public and invites for public comment.

The CFR

- The Code of Federal Regulations ("CFR") contains the rules and regulations adopted by governmental agencies.
- These rules and regulations are supposed to further the legislation adopted by Congress, and they must be consistent with the agency's enabling legislation.
- These Rules and Regulations are just as enforceable as the U.S. Code.

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Rules & Regulations Adopted by the FHA
The CFR, Part 100

CFR Title 24: Housing and Urban Development

PART 100— DISCRIMINATORY CONDUCT UNDER THE FAIR HOUSING ACT

Contents

Subpart A—General
Subpart B—Discriminatory Housing Practices
Subpart C—Discrimination in Residential Real Estate-Related Transactions
Subpart D—Prohibition Against Discrimination Because of Handicap
Subpart E—Housing for Older Persons
Subpart F—Interference, Coercion or Intimidation
Subpart G—Discriminatory Effect

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The Fair Housing Act Prohibitions

1. The FHA prohibits housing providers from discriminating against housing applicants or residents because of their *disability* or the disability of anyone associated with them.
2. The FHA prohibits treating persons with disabilities less favorably than others.
3. The FHA makes it unlawful for any person to refuse to permit, at the expense of the disabled person, *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.
4. The FHA makes it unlawful for any person to refuse to make *reasonable accommodations* in rules, policies, practices, or services, when such accommodations may be necessary to afford … person(s) with disabilities equal opportunity to use and enjoy a dwelling.

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Exemptions

1. Religious: Generally, the FHA **does not** prohibit a religious organization from limiting the sale, rental, or occupancy of dwellings which it owns or operates to persons of the same religion, or from giving preference to such persons, *unless i) membership in the religion is restricted because of race, color, or national origin or ii) the dwelling has a commercial purpose* (also applies to not for profit institutions.)

2. Private Clubs: The FHA **does not** prohibit a private club from limiting the rental or occupancy of such lodgings to its members or from giving preference to its members when i) the lodging is not open to the public, ii) the lodging is incident to the club's primary purpose, and iii) the lodging is not for a *commercial purpose.*

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Exemptions (con't)

3. Familial Status: The FHA **does not** apply to discrimination based on familial status with respect to housing for older persons (55+ communities and 62+ communities).

4. Controlled Substances: The FHA **does not** prohibit conduct against a person because such person has been convicted by any court of competent jurisdiction of the illegal manufacture or distribution of a controlled substance.

5. Real Estate: The FHA **does not** apply to certain real estate transactions where i) the owner does not own or have any interest in more than three single family houses at any one time, **and** ii) the house is sold or rented without the use of a real estate broker, agent or salesperson or the facilities of **any** person in the business of selling or renting dwellings. *(an oversimplification)*

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ADA and FHA Comparison

ADA	Interplay	Fair Housing Act
• Prohibits discrimination based on disability • Applies to employment, government, public accommodations, commercial facilities, transportation, and telecommunications • Animals: Only provides for service dogs which require particular training (and the occasional miniature horse, too)	• Both prohibit discrimination based on disability • Both provide for animals which assist the disabled • Both provide for accommodations to policies and physical facilities • Both essentially provide the same definition for the ADA term "disabled" and the FHA term "handicap" • Both may apply depending on the circumstances, such as residential communities which contain commercial facilities	• Prohibits housing discrimination on the basis of race, color, religion, sex, disability, familial status and national origin • Applies to private housing, housing that receives Federal financial assistance *(i.e., lending practices)*, and State and local government housing • Animals: Provides for assistance animals, which include service type animals and emotional support animals

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Handicap and Disability

FHA uses the term "handicap"

ADA uses the term "disability"

Both terms have the same legal meaning. The definition of "disability" in the ADA is drawn almost verbatim from the definition of "handicap" contained in the FHA.

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"Handicap"

The term ***"handicap"*** means, with respect to a person,

1. a physical or mental impairment which substantially limits one or more major life activities;

2. a record of such an impairment; or

3. being regarded as having such an impairment.

The term "handicap" does not include current, illegal use of, or addiction to, a controlled substance.

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"Physical or Mental Impairment" includes

...any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine;

or

...any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term physical or mental impairment includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, Human Immunodeficiency Virus infection, mental retardation, emotional illness, drug addiction (other than addiction caused by current, illegal use of a controlled substance) and alcoholism. *(does not appear to include Hepatitis C)*

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"Major Life Activities" Means

The term ***"major life activities"*** means functions such as:

- caring for one's self,
- performing manual tasks,
- walking,
- seeing,
- hearing,
- speaking,
- breathing,
- learning and
- working.



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"Has a Record of Such Impairment" Means

A history or record of, or has been classified as having, a mental or physical impairment that substantially limits one or more major life activities.

* * * * * * * * * * *

"Is Regarded as Having an Impairment" Means

1. Has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by another person as constituting such a limitation, or
2. Has a physical or mental impairment that substantially limits one or more major life activities only as a result of the attitudes of other toward such impairment, or
3. Has none of the impairments defined in paragraph (a) of this definition but is treated by another person as having such an impairment.

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Unlawful Inquiries

It is unlawful for an association to ask:

1. if an applicant for a dwelling has a disability, or

2. if a person intending to reside in a dwelling or anyone associated with an applicant or resident has a disability, or

3. about the nature or severity of a person's disability.

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Reasonable Accommodations and Reasonable Modifications

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Reasonable Accommodation vs. Reasonable Modification

Reasonable Accommodation

Under the FHA, a reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice or service.

Reasonable Modification

Under the FHA, a reasonable modification is a structural change made to the premises.

A person with a disability may need either a **reasonable accommodation** or a **reasonable modification**, or both, in order to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces.

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Reasonable Accommodation

It is unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a handicapped person equal opportunity to use and enjoy a dwelling unit, including public and common use areas.

As to assistance animals, requests are made for reasonable accommodation to an association's pet restrictions so that a disabled person may have an assistance animal within the community.

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Reasonable Accommodations for Assistance Animals

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Association Procedures

- The FHA does not require that an association adopt any formal procedures for reasonable accommodation requests.
- However, having formal procedures may aid disabled persons in making reasonable accommodation requests and may aid the association in assessing those requests, and, in the event of later disputes, provide records to show that the requests received proper consideration.
- The association may make the truth and accuracy of information provided during the process part of the representations made by a tenant under a lease to the extent the lease requires the truth and accuracy of other material information.

IMPORTANT CAVEAT

A housing provider may not refuse a request because the individual making the request did not follow any formal procedures that the provider has adopted.

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The Request

1. A disabled person is not entitled to receive a reasonable accommodation unless one is requested.
2. The FHA does not require that a request be made in a particular manner or at a particular time.
3. A person with a disability need not personally make the request. It can be made by a family member or someone else who is acting on his/her behalf.
4. An individual making a request does not need to mention the FHA or use the words "reasonable accommodation." *However, the person making the request must make the request in a manner that a reasonable person would understand to be a request for an exception, change, or adjustment to a rule, policy, practice, or service because of a disability.*
5. A request may be made at any time, even after the resident has brought the animal into the community.

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What Type of Assistance Animal Is It?

Once the association receives a reasonable accommodation request for an assistance animal, the association must ask itself what type of assistance animal is it?

There are two types of assistance animals:

1. Service animals
2. Support animals

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Service Animals

- Under the ADA, a "service animal" is narrowly defined as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability.
- Performing "work or tasks" means that the dog is trained to take a specific action when needed to assist the person with a disability.
- Other species of animals, whether wild or domestic, trained or untrained, are **not** service animals for the purposes of this definition.
- The work or tasks performed by a service animal must be directly related to the individual's disability.
- Emotional support, comfort, well-being, and companionship are not deemed "work or tasks" for the purpose of a service animal.

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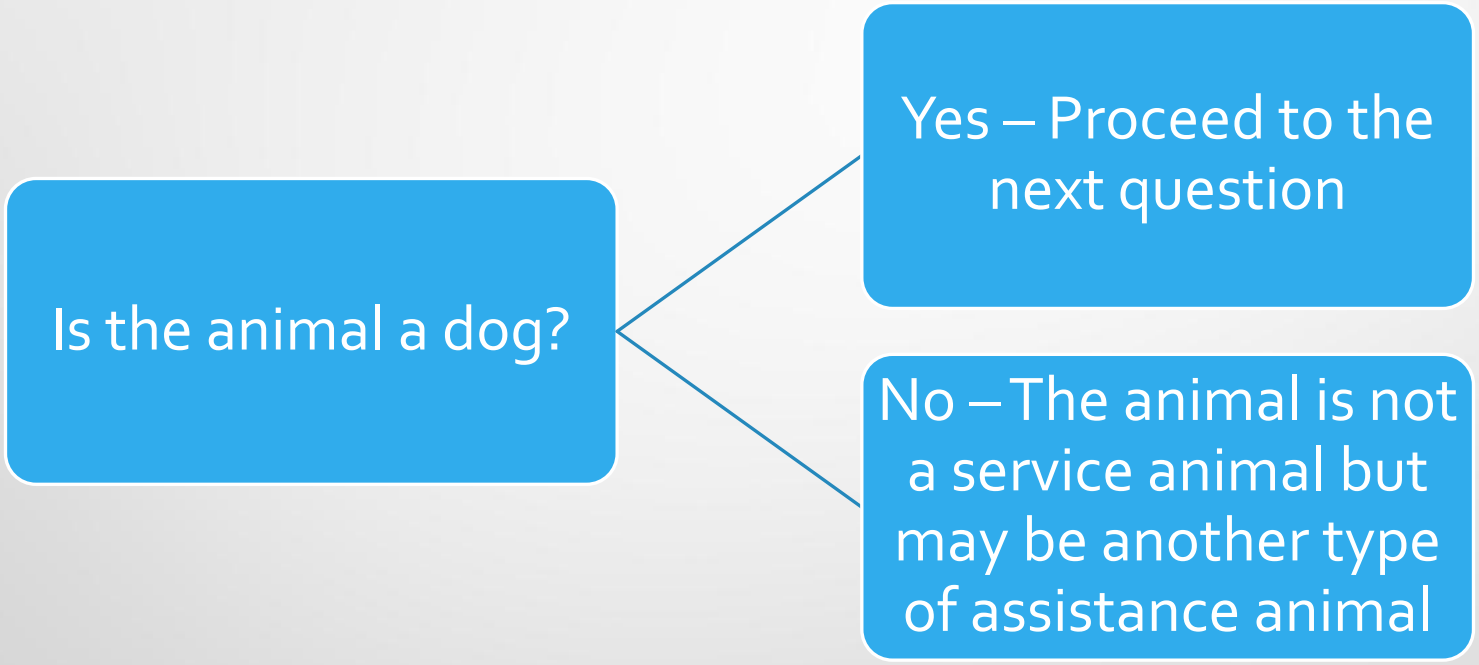
Determining if the Animal Requested is a Service Animal



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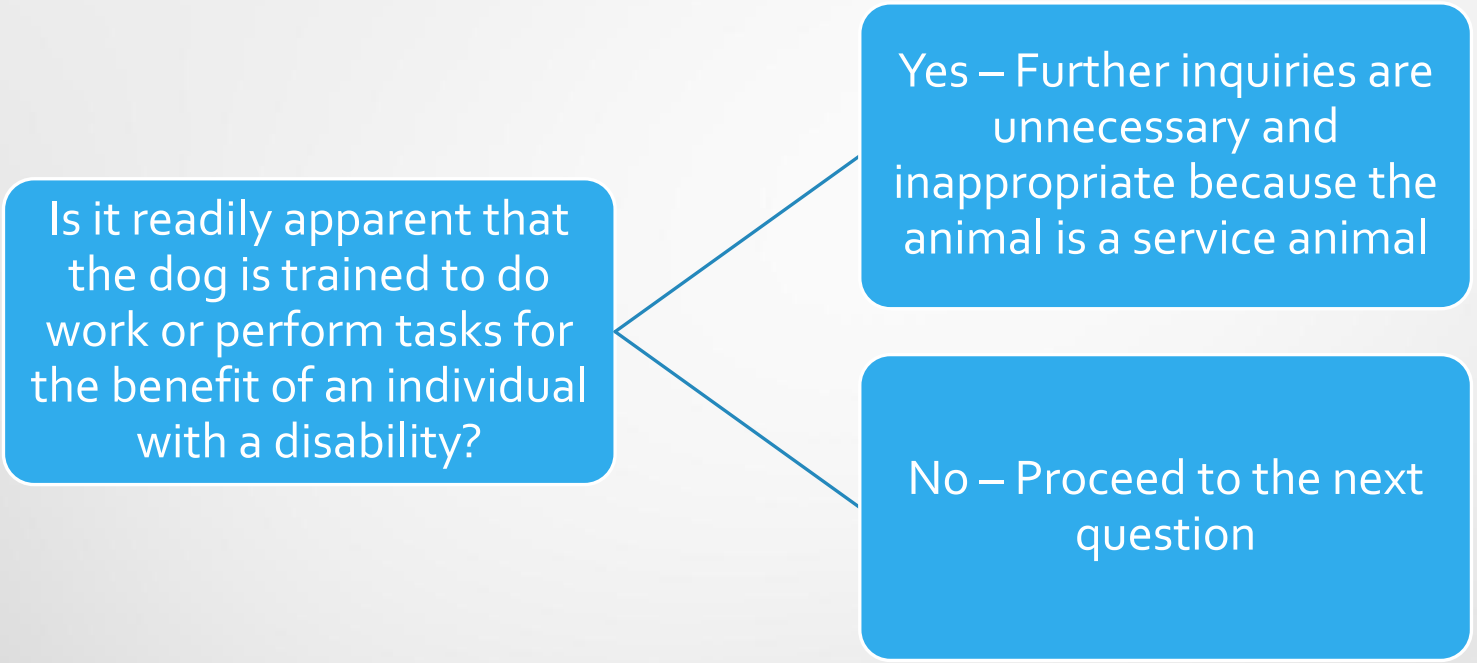
Determining if the Animal Requested is a Service Animal



It is *readily apparent* when a dog is observed:

- Guiding an individual who is blind or has low vision
- Pulling a wheelchair
- Providing assistance with stability or balance to an individual with an observable mobility disability

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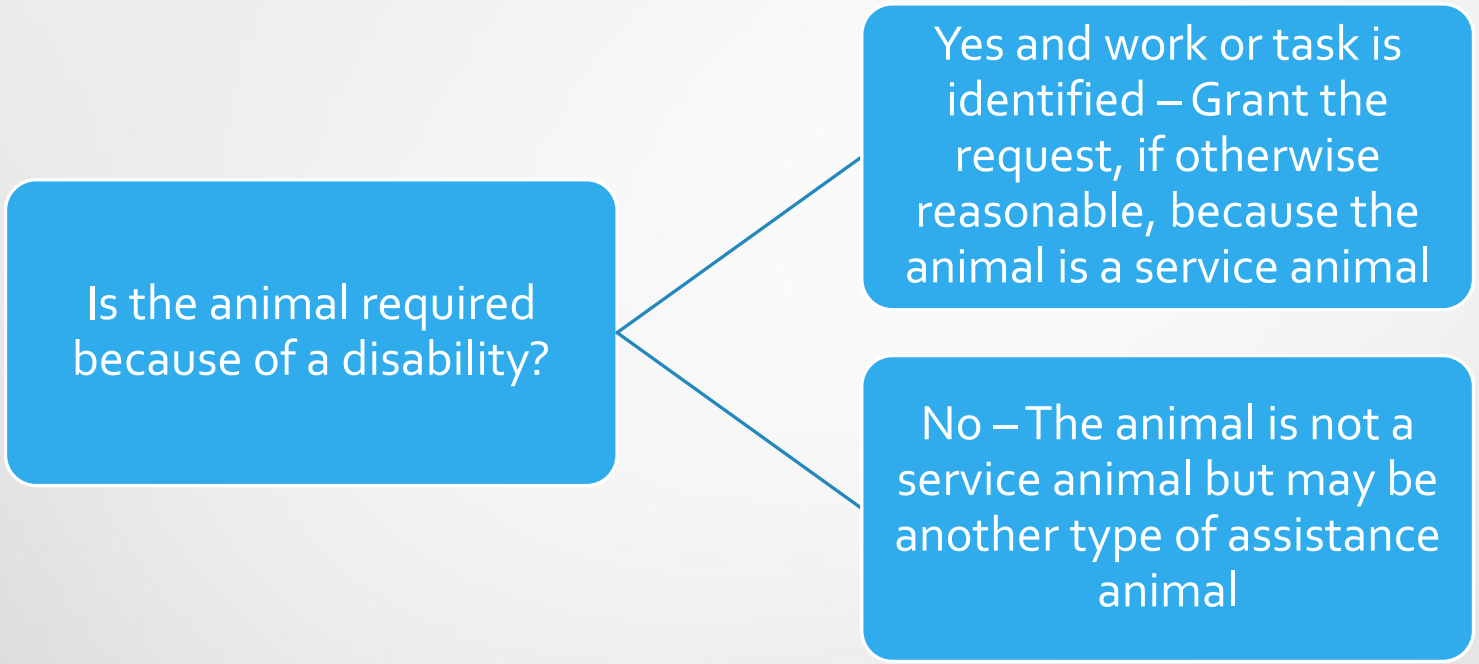
Determining if the Animal Requested is a Service Animal



- If at least one action the dog is trained to take is helpful to the disability, the dog should be considered a service animal.
- If no specific action is identified, the dog should not be considered a service animal but may be another type of assistance animal.

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Support Animals

- If an animal is not a service animal, it may still be entitled to access if it is considered a support animal.
- A "support animal" is a trained or untrained animal that does work, performs tasks, provides assistance, and/or provides therapeutic emotional support for a disabled person.
- Support animals are not required to be dogs and may be any animal commonly kept in households (e.g., cat, small bird, rabbit, hamster, gerbil, other rodent, fish, turtle) or a unique animal that is not commonly kept in households (e.g., reptiles (other than turtles), barnyard animals, monkeys, kangaroos)

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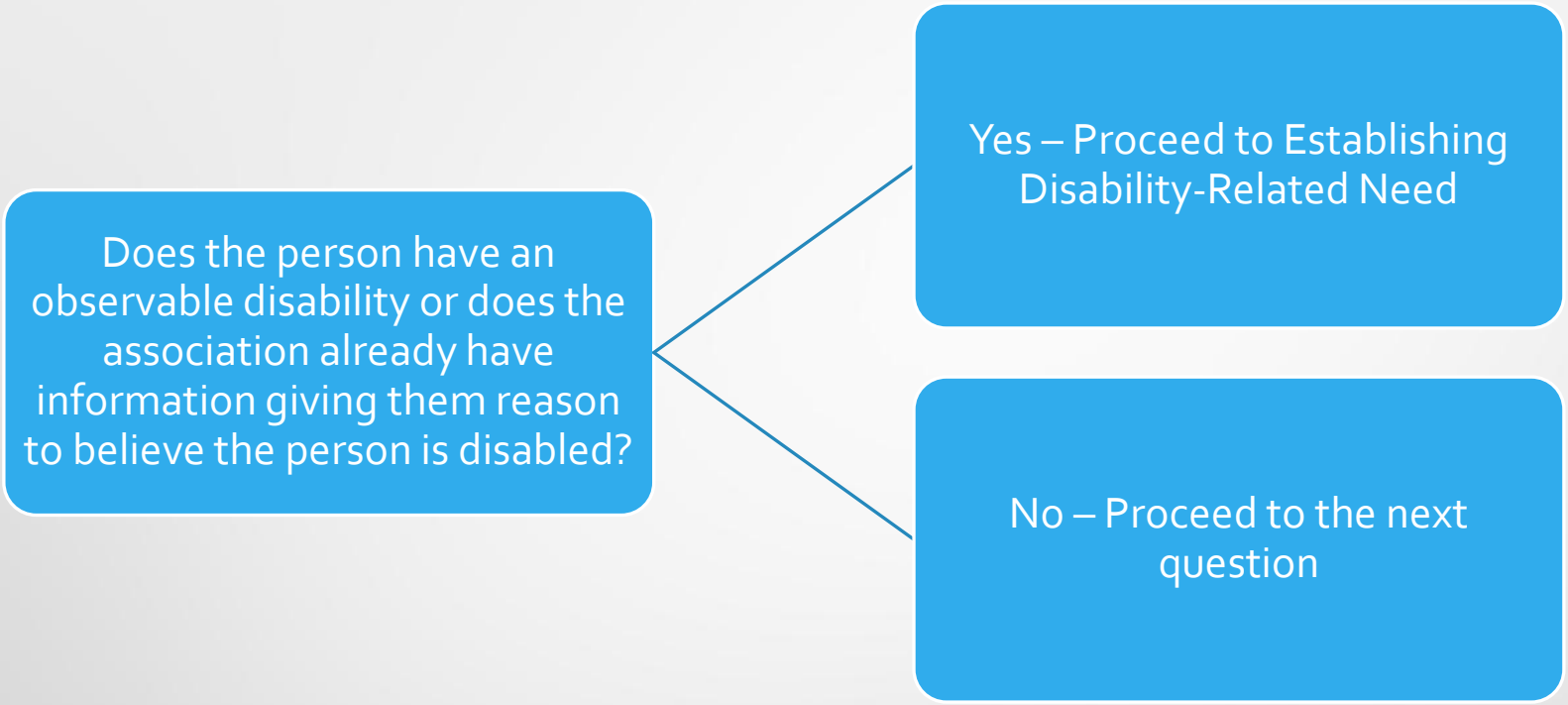
Establishing Disability



Observable disabilities include blindness or low vision, deafness or being hard of hearing, mobility limitations, and other types of impairments (including some types of autism), neurological impairments (e.g., Parkinson's disease, cerebral palsy, epilepsy, or brain injury), mental illness, or other diseases or conditions that affect major life activities or bodily functions.

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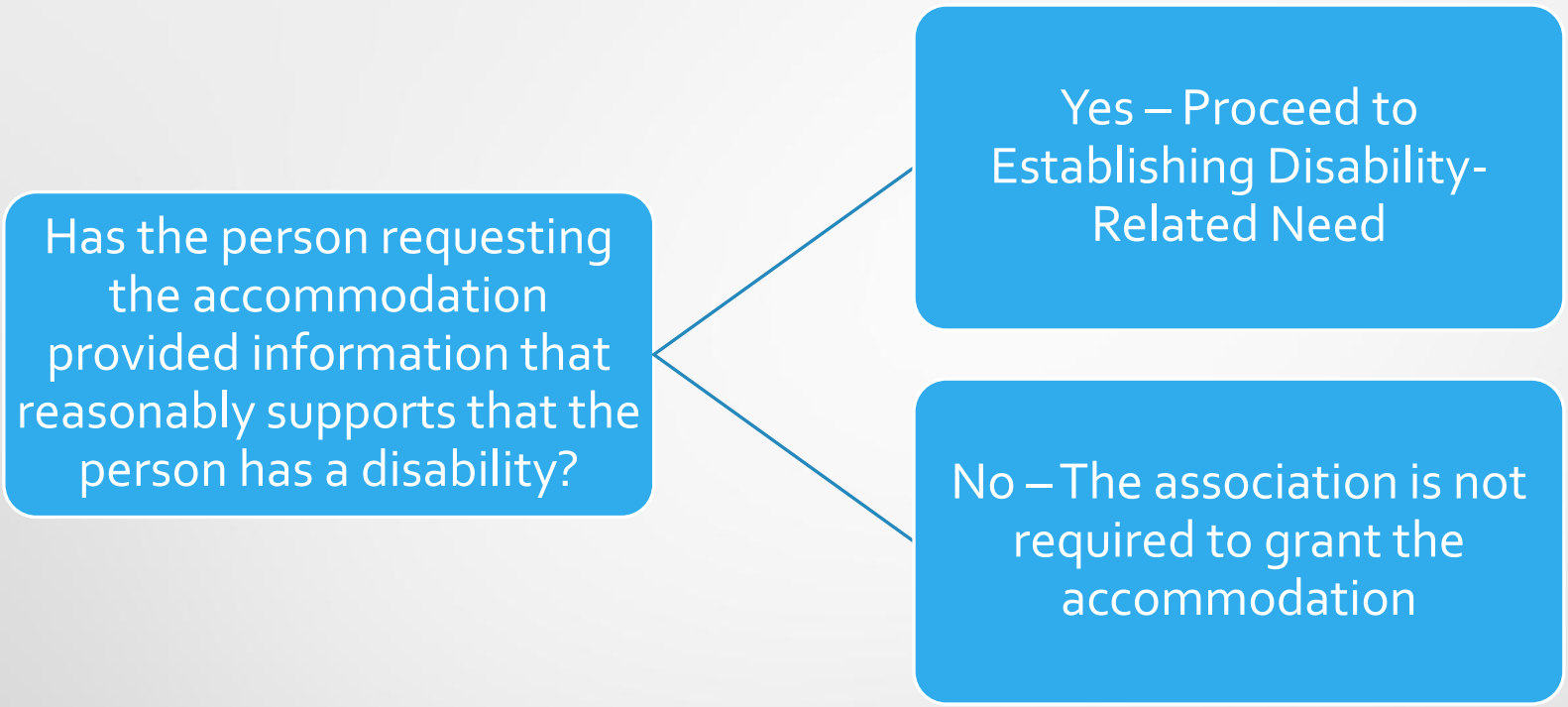
Establishing Disability



The association must provide the person requesting the accommodation with a reasonable opportunity to provide information that reasonably supports that the person has a disability.

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Establishing Disability

- Information about disability may include:
  - A determination of disability from a federal, state, or local government agency
  - Receipt of disability benefits or services (Social Security Disability Income), Medicare or Supplemental Security Income for a person under age 65, veterans' disability benefits, services from a vocational rehabilitation agency, or disability benefits or services from another federal, state, or local agency
  - Eligibility for housing assistance or a housing voucher received because of disability
  - Information confirming disability from a health care professional (e.g., physician, optometrist, psychiatrist, psychologist, physician's assistant, nurse practitioner, or nurse)
- A determination that a person does not qualify as having a disability for purposes of a benefit or other program does not necessarily mean the individual does not have a disability for purposes of the FHA or ADA.

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Establishing Disability

Some types of impairments will, in virtually all cases, be found to impose a substantial limitation on a major life activity resulting in a determination of a disability, including:

- Deafness
- Blindness
- Intellectual disabilities
- Partially/completely missing limbs
- Impairments requiring a wheelchair
- Autism
- Cancer
- Cerebral palsy
- Diabetes
- Epilepsy
- Muscular dystrophy
- Multiple sclerosis
- Human Immunodeficiency Virus (HIV) infection
- Major depressive disorder
- Bipolar disorder
- Post-traumatic stress disorder
- Traumatic brain injury
- Obsessive compulsive disorder
- Schizophrenia

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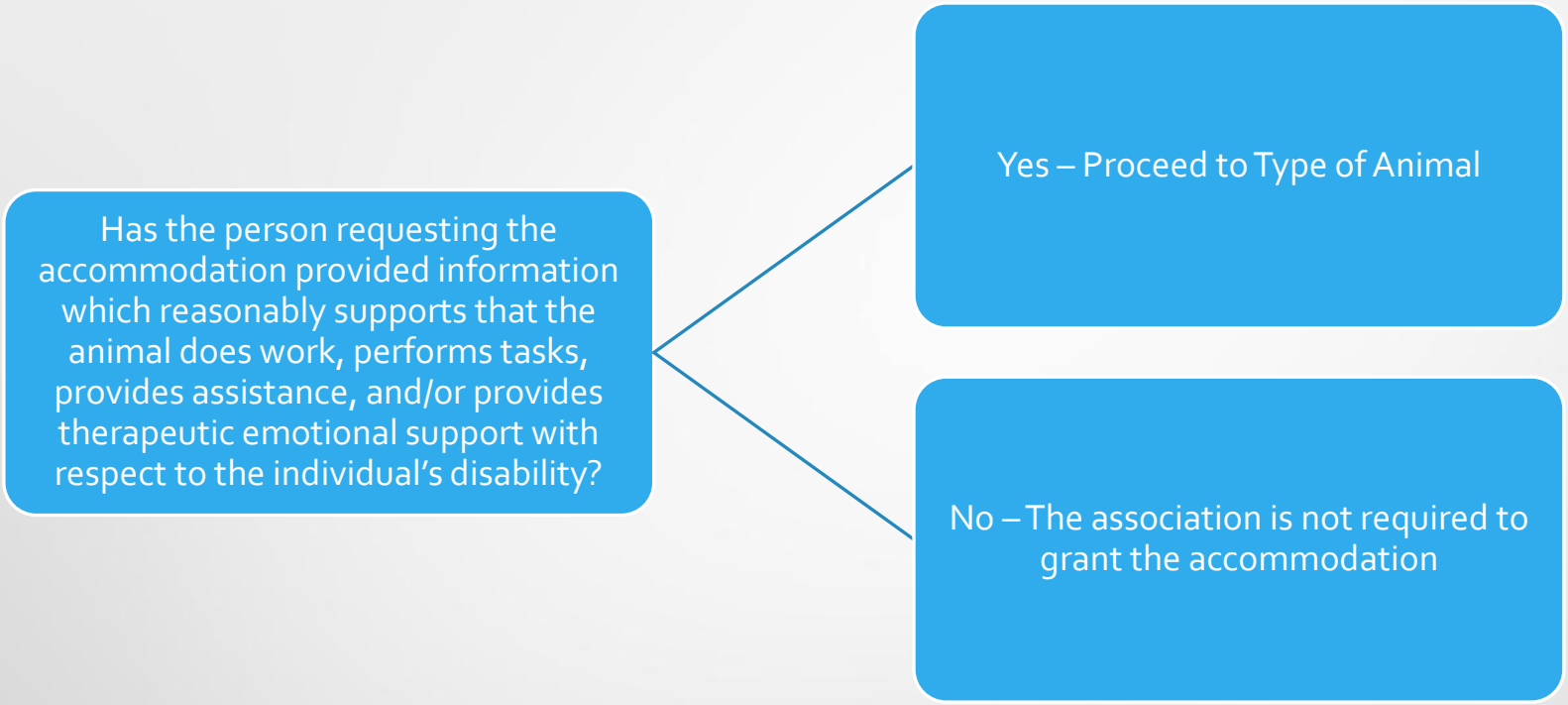
Establishing Disability-Related Need



The association must provide the person requesting the accommodation with a reasonable opportunity to provide information that reasonably supports that the animal does work, performs tasks, provides assistance, and/or provides therapeutic emotional support with respect to the individual's disability.

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Documentation

- Reasonably supporting information often consists of information from a licensed health care professional (e.g., physician, optometrist, psychiatrist, psychologist, physician's assistant, nurse practitioner, or nurse) general to the condition but specific to the individual and the assistance or emotional support provided by the animal.
- A relationship or connection between the disability and the need for the assistance animal must be provided, particularly where the disability is not observable and/or the animal provides emotional support.
- For non-observable disabilities and animals that provide emotional support, a housing provider may ask for information that is necessary to conduct an individualized assessment of whether it must provide the accommodation. The lack of such documentation, in many cases, may be reasonable grounds for denying a requested accommodation.

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Documentation

- HUD previously encouraged housing providers to direct requestors to its 2020 *Guidance on Documenting an Individual's Need for Assistance Animals in Housing* to help the requestor understand what information is being sought. This Guidance was rescinded in June 2026, but is still the primary resource on the subject of ESA and Service Animals.
- FS § 413.08(9) – 2nd degree misdemeanor to knowingly and willfully misrepresent that you are using a service animal, qualified to use a service animal, or are a trainer of a service animal, punishable as that type of crime and adding a requirement to those penalties that someone convicted must perform 30 hours of community service for an organization that serves individuals with disabilities, or for another entity or organization at the discretion of the court, to be completed in not more than 6 months.
  - *See also* F.S. § 817.265 (establishing the same general concept outside of Florida's Fair Housing Act).

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Internet Documentation

- Some websites sell certificates, registrations, and licensing documents for assistance animals to anyone who answers certain questions or participates in a short interview and pays a fee.
- In HUD's experience, such documentation from the internet is not, by itself, sufficient to reliably establish that an individual has a non-observable disability or disability-related need for an assistance animal.
- However, many legitimate, licensed health care professionals deliver services remotely, including over the internet.
- One reliable form of documentation is a note from a person's health care professional that confirms a person's disability and/or need for an animal when the provider has personal knowledge of the individual.

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Official Records

Documents provided to the association regarding a request for a reasonable accommodation are to be maintained among the official records of the association…

HOWEVER!

Section 718.111(12)(c) and Section 720.303(5)(c), Florida Statutes, provide that members cannot inspect certain official records of the association, including:

- Information obtained in connection with the approval of the lease, sale, or other transfer of a unit or a parcel.
- Medical records of unit owners, parcel owners, or HOA community residents.
- Social security numbers, driver's license numbers, and other personal identifying information of any person.

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Type of Animal

Is the animal commonly kept in households?

- Yes – The request should be granted, unless an exception exists
- No – The association is not required to grant the accommodation, except in rare circumstances

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Unique Animals

- If the individual is requesting to keep a unique animal, then the requestor has the substantial burden of demonstrating a disability-related therapeutic need for the specific animal or the specific type of animal.
- The individual is encouraged to submit documentation from a health care professional confirming the need for this animal. For example, that:
  - Allergies prevent the person from using a dog
  - Without the animal, the symptoms or effects of the person's disability will be significantly increased
- Example: An individually trained monkey performs tasks for a person with paralysis caused by a spinal cord injury. The monkey has been trained to retrieve a bottle of water from the refrigerator, unscrew the cap, insert a straw, and place the bottle in a holder so the individual can drink and can switch lights on and off and retrieve requested items from inside cabinets. The unique animal is permitted because the monkey can use its hands to perform manual tasks that a dog cannot perform.

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Animal Poses a Direct Threat

- A housing provider is not required to provide a reasonable accommodation where the animal poses a **direct threat** that cannot be eliminated or reduced to an acceptable level through actions the individual takes to maintain or control the animal (e.g., keeping the animal in a secure enclosure).
- A determination that an assistance animal poses a direct threat of harm to others must be based on an **individualized assessment** that relies on objective evidence about the specific animal's actual conduct – not on mere speculation or fear about the types of harm or damage an animal may cause and not on evidence about harm or damage that other animals have caused.

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Interactive Process

- An association **cannot** deny the request for an assistance animal because the board is uncertain whether or not the person seeking the accommodation has a disability or a disability-related need for an assistance animal.
- Before denying a reasonable accommodation request due to lack of information confirming an individual's disability or disability-related need for an animal, the housing provider is encouraged to engage in a good-faith dialogue with the requestor called the "interactive process."
- The housing provider may not insist on specific types of evidence if the information which is provided or actually known to the housing provider meets the minimum requirements of the FHA. Disclosure of details about the diagnosis or severity of a disability or medical records or a medical examination cannot be required.

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If Refused, then Must Consider Alternative Accommodations

- When a housing provider lawfully refuses a requested accommodation because it is not reasonable, the provider should discuss with the requesting party whether there is an alternative accommodation that would effectively address the requester's disability-related needs without a fundamental alteration to the provider's operations and without imposing an undue financial and administrative burden.
- If an alternative accommodation would effectively meet the requester's disability-related needs and is reasonable, the provider must grant it.

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Prohibited Acts

- Associations **cannot** require applicants and residents to pay a deposit for an assistance animal or to pay any extra fee as a condition of receiving a reasonable accommodation, even if such deposit or fee is charged for pets.
- An association also **cannot** ask an applicant to provide access to medical records or medical providers or provide detailed or extensive information or documentation of a person's physical or mental impairments.
- An association **cannot** unreasonably delay a response to a reasonable accommodation request. An undue delay in responding may be deemed to be a failure to provide a reasonable accommodation.

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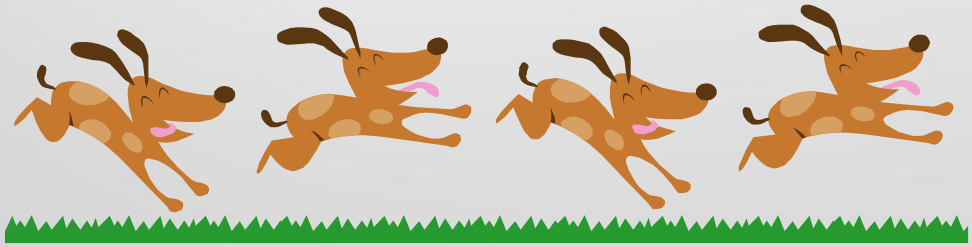
Where, Oh Where Can an Assistance Animal Go?

- A disabled person is responsible for feeding, maintaining, providing veterinary care, and controlling the assistance animal. The individual may do this on his/her own or with the assistance of family, friends, volunteers, or service providers.
- The association must modify or provide an exception to its "no pets" rule or policy to permit a person with a disability to live with and use an assistance animal(s) *in all areas of the premises where persons are normally allowed to go*, unless doing so:
  - would impose an undue financial and administrative burden, or
  - would fundamentally alter the nature of the housing provider's services.



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Rules Governing Conduct Assistance Animals

- Conditions and restrictions that apply to pets may not be applied to assistance animals, such as weight, breed, or size restrictions.
- Given a board's authority to promulgate reasonable rules and regulations, a board has limited ability to adopt rules and regulations applicable to assistance animals. **HOWEVER…**
  - It is unclear as to whether it is acceptable for an association to promulgate reasonable rules governing assistance animal conduct, such as a rule requiring owners of assistance animals to pick up the animal's waste or a rule prohibiting the presence of the animal within a pool area. As such, there may exist an issue regarding enforceability of such rules and regulations and their ability to withstand challenge.
  - Even if such rules and regulations may apply to support animals, they might not apply to service animals.

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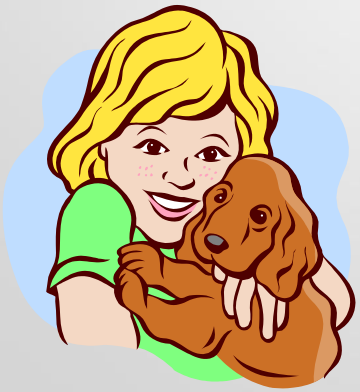
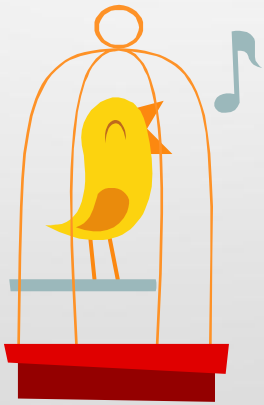
Effect on Pets

An assistance animal does not count toward the number of allowable pets.

If two dogs are allowed and the request for an assistance animal is substantiated, the owner could have three dogs comprised of two pets and one assistance animal.







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Violations of the Fair Housing Act

A plaintiff can establish a claim under three separate theories:

1. Intentional discrimination
2. Disparate Impact
3. Failure to allow a reasonable accommodation/ modification

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Venues to Bring a Complaint

- **Administrative Agencies** (for administrative determination): As fair housing laws exist at the Federal and State levels and may exist at the local level, an aggrieved party may file a complaint with each for a violation of each level's fair housing laws:
  - Federal: Complaints regarding a violation of the Federal Fair Housing Act are brought to HUD (may refer to State or local agency)
  - State: Complaints regarding a violation of Florida's fair housing laws are brought to the Florida Commission on Human Relations
  - Local example: Complaints regarding a violation of Palm Beach County's fair housing ordinances are brought to the Palm Beach County Office of Equal Opportunity
- **Court** (for judicial determination): The aggrieved party does not have to seek relief from an administrative agency prior to filing a lawsuit in court. A complaint that has been brought to HUD may still be taken to court so long as a conciliation agreement has not been entered into and an Administrative Law Judge has not started a hearing.
- **The Division**: The Division will not hear fair housing violation claims. The claimant will be instructed to file a complaint with an administrative agency and provide proof of such filing for a stay of arbitration.

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HUD Administrative Hearing

1. The complainant and the association will have an opportunity to "conciliate" (settle) the dispute during HUD's investigation of the matter.
2. If HUD finds "reasonable cause," the case will go before an Administrative Law Judge (ALJ) within 120 days, or either party may elect for the case to be heard by the Federal District Court (which will be further discussed).
3. A HUD or DOJ decision not to proceed with a FHA matter does not foreclose private plaintiffs from pursuing a private lawsuit.
4. If the case is heard by the ALJ and the ALJ presiding over the case determines that discrimination occurred, the association can be ordered:
   - to compensate the complainant for actual damages, including humiliation, pain and suffering.
   - to provide injunctive or other equitable relief, for example, to make the housing available to the complainant.
   - to pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are $16,000 for a 1st violation and $65,000 for a 3rd violation within 7 years.
   - to pay reasonable attorney's fees and costs.

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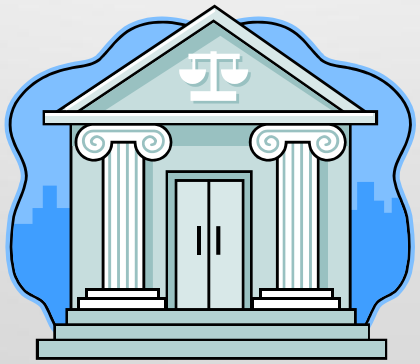
Attorneys At Law

Federal District Court

- Within 20 days of HUD issuing a charge that it has found "reasonable cause" against the respondent, either party may elect to have the case decided in Federal District Court.
- Within 30 days of such election, the Department of Justice will file a suit and litigate it on the complainant's behalf.
- The Federal District Court can order relief and award actual damages, attorney's fees and costs.
- In addition, the court can award *punitive damages*.



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Action by the Complainant

- The complainant may, at his/her own expense, file suit in Federal District Court within two years of an alleged violation so long as the complainant has not signed a conciliation agreement and an ALJ has not begun an administrative hearing.
- A court may award actual and *punitive damages* and attorney's fees and costs.



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Cases of Interest: Director Liability

Kaye Bender Rembaum
Attorneys At Law

Director Personal Liability

H.O.P.E. v Key Colony 4, and its board members, individually (2007)

The plaintiffs alleged that each and every member of the Board of Directors was personally involved in each and every discriminatory act mentioned in their complaint and that each member of the board of directors personally and intentionally discriminated against families.

In response, the defendant board members filed a motion to dismiss alleging that their acts were taken on behalf of the corporation, and therefore they could not have individual liability as per s. 617.0834, Florida Statutes.

The Court held:

1. *Section 61* 7.0834 does not protect against willful violations of rights protected by the FHA. Because the statute's immunity does not apply where the officer's breach his or her duties constitutes recklessness or an act or omission which was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. Thus, board members can be held liable for their own unlawful conduct under the Fair Housing Act as alleged in this action.

2. It is clear that the Fair Housing Act allows for claims to be brought against individual Defendants.

3. Therefore, plaintiffs have stated a sufficient claim against the board members and the Court denied the defendants motion to dismiss on this issue.

Kaye Bender Rembaum
Attorneys At Law

Cases of Interest: Assistance Animals

Kaye Bender Rembaum
Attorneys At Law

Hawn v. Shoreline Towers Phase 1 Condominium Association, 2009 WL 691378, affirmed 347 Fed.Appx. 464 (11th Cir. 2009)

THE FACTS:

1. In January 2005, the Hawn unsuccessfully lobbied the Association for permission to keep his dog "Booster" as a pet.
2. When he made the request, Hawn did not claim that he was physically or psychologically disabled.
3. The year after his request for a pet was denied, he had the same dog certified as a service animal, and thereafter claimed for the first time that he was disabled and needed a reasonable accommodation to keep Booster.
4. For his alleged psychological disability, Hawn provided letter stating that for "a long time" before he had been abused, kidnapped, robbed, and assaulted by the stepson of a friend.
5. Hawn argued that if Booster was in his condo unit and an intruder entered, Booster would at least make him aware of an intruder, summon help, and bring him the phone upon command.
6. Hawn provided two letters about Booster's "resume" and his various certification records.

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The Facts, continued

7. The manager sent Hawn a letter asking for additional information so that the board could consider the request. No response.
8. On September 13, 2006, the general manager wrote a letter to the plaintiff and again asked for documentation, including: i) additional expert evidence under oath of the nature of your impairment, ii) the manner in which it substantially limits one or more of your major life functions or activities, iii) how the requested pet is necessary to afford you an equal opportunity to use and enjoy your dwelling and iv) if there are other corrective measures which will permit such use and enjoyment. Hawn failed to respond.
9. Instead, Hawn filed a complaint with the Florida Commission on Human Relations ("FCHR") who found that there was cause to believe that the defendants discriminated against him by not providing a reasonable accommodation.
10. Hawn filed his lawsuit alleging violation of the FHA (count I); violation of the Florida Fair Housing Act (count II); and intentional or reckless infliction of emotional distress (count III). He also sought an injunction (count IV).

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Hawn's Evidence

Letter 1 from Psychologist Evans

1. Psychologist, Patrick Evans, Ph.D., opined that the Hawn suffered from severe panic attacks. Dr. Evan's wrote that the Hawn was unable to properly cope with anxiety and stress and that he was particularly vulnerable "while residing at his home/condo due to past occurrences on that property."
2. Dr. Evans wrote that he was "prescribing a service animal" to provide support and help Hawn cope with his "emotionally crippling disability." This included a brief description of what specific tasks Booster was able to perform, e.g., bringing and removing his shoes and socks, opening the refrigerator and bringing him water, pulling him out of a chair, bringing him a phone in case of an emergency or panic attack, barking to notify if there is an intruder or to summon help, providing an exercise routine, creating a diversion to provide a reason to leave a bad situation, and "giving hugs" to calm after a panic attack.

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Hawn's Evidence

Letter 2 from Chiropractor Hoda

1. Chiropractor Hoda, wrote that he was "intimately familiar" with the Hawn's history and the "functional limitations imposed by his disability."

2. Chiropractor Hoda opined that Hawn had "certain limitations regarding mobility" and that a support animal would "assist with his disability."

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Attorneys At Law

The Court's Findings

Regarding Letter 1 from psychologist Evans

1. Although the association could not have known this at the time, the record showed that at the time Dr. Evans signed this one-page letter, his entire treatment of Hawn consisted of two recent one-hour counseling sessions.

2. During the second session, the plaintiff gave Dr. Evans the "text" or "template" for the letter that he wanted to be sent to Shoreline. Dr. Evans testified during deposition that he used "much" of what the Hawn wrote, although he "probably made some changes."

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The Court's Findings

Regarding Letter 2 from Chiropractor Hoda

1. The Court noted that Chiropractor Hoda made no attempt to explain what Hawn's purported limitations and disability were.
2. The record reflects that at the time he signed his letter, Chiropractor Hoda (like Dr. Evans) had seen the Hawn only two times. Specifically, he examined the plaintiff once several years earlier in 1999, and once in April 2006, shortly before he signed his letter to the board.
3. For both visits Hoda only performed examinations; he did not render any treatment.
4. Chiropractor Hoda conceded at deposition that although he signed it, Hawn wrote the letter.

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The Outcome

1. The court concluded that… the board did not deny the request, but rather it asked the plaintiff twice to provide additional documentation which the plaintiff failed to do both times.
2. The board did not outright deny the plaintiff's request. It held a meeting, put the issue on the agenda, and allowed the Hawn to give a speech in support.
3. Given the lack of information they had (and in light of the fact that plaintiff had previously asked for permission to keep the same dog as a "pet"), no reasonable juror could conclude that the board knew the Hawn was handicapped when it made the decision to deny his request.

THEREFORE, THE COURT HELD THAT THE ASSOCIATION DID NOT ACT IMPROPERLY BY REQUESTING ADDITIONAL INFORMATION.

Kaye Bender Rembaum
Attorneys At Law

Sun Harbor HOA v. Bonura

95 So.3d 262 (4th DCA 2012)

THE FACTS:

1. Mr. Bonura's fiancée resided at Mr. Bonura's townhouse with her dog.

2. The townhouse was located within the Sun Harbor community which had a no-dog policy.

3. Letters sent to Sun Harbor from Mr. Bonura's attorney provided that the animal was a *"registered service dog' needed to assist his fiancée with an unspecified disability"*.

4. As there was no information received prior to trial from medical professionals, three (3) medical professionals testified at trial in support of the claim that the fiancée should receive a reasonable accommodation for her *"therapy dog"*

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Attorneys At Law

Bonura's Evidence

THE LETTERS FROM THE THREE (3) MEDICAL PROFESSIONALS:

1. Dr. Matthew Ross, a medical doctor, testified that he treated the fiancée between 2004 and 2005 for injuries sustained as a result of an automobile accident. After treatment, while the fiancée did have *"lingering deficits in coordination and dexterity, he concluded that she did not have any substantial limitation on any major life activity"*.
2. Dr. Antonio DeFilippo, a psychiatrist who saw the fiancée only four times and only after the lawsuit was filed, recommended the use of a *"therapy dog"* due to the fiancée's *"ongoing depression and anxiety"*. Dr. DeFilippo also testified that the fiancée's *"ongoing depression and anxiety"* was helped by the *"therapy dog"* on *"his personal observation on two occasions of her interaction with the dog"*.
3. Ms. Jacquelyn Smith, a nurse and personal friend of the fiancée, found that the fiancée's *"severe depression and extreme anxiety"* greatly improved as a result of the assistance animal and made a similar recommendation to the Court.

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The Outcome

THE COURT HELD THAT THE LETTERS WERE INSUFFICIENT:

1. The Court determined that the letters were insufficient and provided unclear explanations as to the nature and extent of the fiancée's disability such that Sun Harbor could not conduct a meaningful review and that the testimony from the medical professionals did not provide "competent and substantial evidence indicating any substantial limitation on one or more of the fiancée's major life activities" and "failed to establish the necessity of the accommodation".

2. The Court seems to suggest that a letter stating "how [the fiancée] is qualified, the limitations and difficulties she was suffering from, why she is entitled to the dog or that the dog that occupied the residence was 'necessary… to afford [the fiancée] equal opportunity to use and enjoy a dwelling'" would be sufficient evidence to require a reasonable accommodation for an assistance animal.

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Attorneys At Law

McKay v. South Seas East Condo Apt.'s of Marco Island
2012 WL 2872856 (M.D. Fla. 2012)

THE FACTS:

1. McKay, a unit owner, alleged that he was "handicapped with physical impairments which substantially limit his ability to walk and maintain his balance" and that "due to his handicap and related health conditions, he requires the assistance of a service animal."
2. McKay made his initial request to have an assistance animal reside with him to which the association requested additional information related to his request.
3. In response to the association's request, McKay provided that the association's request for medical records was over broad and in excess of what was necessary to make a determination to provide him with an accommodation.
4. The association then acknowledged that the qualifications of the animal were not an issue but reissued their request for medical information.

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THE DOCTOR'S LETTERS:

1. McKay subsequently delivered a doctor's letter to the association which provided that McKay required the use of an assistance animal and that the animal assisted McKay with balancing to prevent falls, getting up after a fall, guiding McKay while walking, turning lights on and off and contacting emergency medical services.

2. A second letter from the doctor was also sent to the association which additionally provided that no other assistance device, such as a cane or walker, could provide the same assistance to McKay.

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The Outcome

THE COURT FOUND IN McKAY'S FAVOR:

1. The court determined that McKay sufficiently established that he is handicapped for the purposes of the FHA and that the requested accommodation was "necessary to afford him the opportunity to use and enjoy his dwelling" upon the association's receipt of the initial doctor's letter.

2. The court provided, in pertinent part, that:

   "For a demand to be specific enough to trigger the duty to provide a reasonable accommodation, the defendant must have enough information to know of both the disability and desire for an accommodation, or circumstances must at least be sufficient to cause a reasonable [defendant] to make appropriate inquiries about the possible need for an accommodation."

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FHA Case Studies

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FHA Case Study #1

An applicant with an obvious mobility impairment who regularly uses a walker to move around asks her association to assign her a parking space near the entrance to the building instead of a space located in another part of the parking lot.

1. Can the association require the applicant to provide additional information about her disability?

2. Can the association require the applicant to provide additional information regarding the her need for the requested accommodation?

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FHA Case Study #2

A rental applicant who uses a wheelchair advises the association that he wishes to keep an assistance dog in his unit even though the provider has a "no pets" policy.

The applicant's disability is readily apparent but the need for an assistance animal is not obvious to the provider.

1. Can the association ask the applicant to provide information about the disability-related need for the dog?

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FHA Case Study #3

An applicant with an obvious vision impairment requests that the association provide assistance to her in filling out the association's application form as a reasonable accommodation because of her disability.

1. Must the association provide the requested assistance?

2. Can the Association require the applicant to document the existence of her vision impairment?

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FHA Case Study #4

The association has a policy of requiring owners to come to the office in person to pay their assessments.

An owner has a mental disability that makes her afraid to leave her unit. Because of her disability, she requests that she be permitted to have a friend mail her rent payment to the rental office as a reasonable accommodation.

1. Must the association make an exception to its payment policy to accommodate this owner?

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FHA Case Study #5

Because of his disability, an applicant with a hearing impairment needs to keep an assistance animal in his unit as a reasonable accommodation.

1. Can the association charge an application fee?

2. Can the association charge a security deposit?

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FHA Case Study #6

An owner in the association makes an oral request that she be assigned a mailbox in a location that she can easily access because of a physical disability that limits her ability to reach and bend. The association would prefer that the owner make the accommodation request on a pre-printed form, but the owner fails to complete the form.

1. Must the association consider the reasonable accommodation request even though the owner did not use the association's designated form?

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FHA Case Study #7

As a result of a disability, an owner's tenant is physically unable to open the dumpster placed in the parking lot by the association for trash collection. The tenant requests that the association send a maintenance person to his apartment daily to collect his trash and take it to the dumpster. The association is a small operation with limited financial resources and the maintenance staff are on site only twice per week.

1. Must the association grant the request?

2. Does the answer change if an owner, rather than the tenant, makes the request?

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FHA Case Study #8

A tenant is arrested for threatening his neighbor while brandishing a baseball bat. The declaration prohibits owners and tenants from threatening violence against other residents. The association manager investigates the incident and learns that the tenant threatened another owner with physical violence and had to be physically restrained by others to keep him from acting on his threat. Following the association's standard practice of strictly enforcing its "no threats" policy, the manager issues the tenant a 30-day notice to quit, which is the first step in the eviction process. The tenant's attorney contacts the manager and explains that tenant has a psychiatric disability that causes him to be physically violent when he stops taking his prescribed medication. Suggesting that his client will not pose a direct threat to others if proper safeguards are taken, the attorney requests that the association grant an exception to the "no threats" policy as a reasonable accommodation based on his disability.

1. Must the association grant the request?

What if, after consulting with the tenant, the attorney responds that the tenant is unwilling to receive counseling or submit to any type of periodic monitoring to ensure that he takes his prescribed medication.

2. Must the association grant the request?

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FHA Case Study #9

An association requires all applicants to complete an application that includes information on the applicant's current place of residence. On her application to rent a unit, a woman notes that she currently resides in Cambridge House. The manager of the condominium complex knows that Cambridge House is a group home for women receiving treatment for alcoholism and informs the board. Based solely on that information and the manager's personal belief that alcoholics are likely to cause disturbances and damage property, the association rejects the applicant.

1. Is the association's rejection lawful?

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FHA Case Study #10

A man who is substantially limited in his ability to walk uses a motorized scooter for mobility purposes. He applies to live in an association that prohibits the use of motorized vehicles.

1. May the association deny the request to live in the association?

2. Must the association allow the applicant use of his motorized scooter?

3. May the association charge the applicant a deposit as a security against potential damage?

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FHA Case Study #11

An association has 300 units and 450 parking spaces which are available on a first come, first served basis. An applicant applies to live in the association.

The applicant is mobility impaired and is unable to walk more than a short distance and therefore requests that a parking space near his unit be reserved for him so he will not have to walk very far to get to his apartment.

1. Must the association grant the request for the parking spot?

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FHA Case Study #12

The association amended its declaration to provide that only two occupants per bedroom were allowed.

1. What is the reasonable outcome if challenged?

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Questions?

Kaye Bender Rembaum
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SCAN QR CODE FOR SLIDES

FFHA: Assistance Animal or Pet?

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Alan Schwartzseid, a Board-Certified Specialist in Condominium and Planned Development Law, obtained a B.A. from the University of Florida in 2004, a M.S. in International Business from Florida Atlantic University in 2005, and a J.D. from Nova Southeastern University in 2008. Mr. Schwartzseid initially practiced mortgage foreclosure law, and in 2010, joined Kaye & Bender n/k/a Kaye Bender Rembaum to concentrate in the area of community association assessment collection. In 2014, Mr. Schwartzseid left that employ to manage the collection department of Weiss Serota Helfman Cole & Bierman, and in 2018, moved to Central Florida where he spent several years as managing collection attorney and general community association counsel to over 500 communities, with Clayton & McCulloh, P.A.

In August 2022, Mr. Schwartzseid returned to Kaye Bender Rembaum as a Firm Member and managing attorney of the firm's Winter Springs / Orlando, Florida office, where he assists clients in all facets of community association law, with a transactional focus. Mr. Schwartzseid is an active member of the Condominium Committee, who has served on numerous task forces of the Committee, authored several chapters of the Homeowners' Association and Condominium law books now pending publication, is a former chair and current member of the CLE Development Subcommittee, and serves as co-vice chair of the Condominium and Planned Development Board Certification CLE Subcommittee. Mr. Schwartzseid regularly lectures on Community Association law issues (including at the Boyer Institute on Condominium and Cluster Development, and the Condominium and Planned Development Board Certification CLE), and is a Florida Supreme Court Certified County.

Official Records
s. 720.303(4) & (5), Fla. Stat.

The Official Records Include:

- Copies of any plans, specifications, permits, and warranties related to improvements constructed on the common areas or other property that the association is obligated to maintain, repair, or replace
- A copy of the association's governing documents (declaration, articles of incorporation, bylaws, and rules and regulations) and any amendments thereto
    - The association ***must*** maintain an adequate number of copies of the recorded governing documents to ensure their availability to members and prospective members.
- Minutes of all meetings of the board and the members
- A current roster of all members and their designated mailing addresses and lot identifications, and the e-mail addresses and facsimile numbers for those members who consent in writing to receive notice by electronic transmission and have not revoked the consent
- The association's insurance policies
- A current copy of all contracts to which the association is a party
- Bids received by the association for work to be performed

The Official Records Include:

- Financial and accounting records kept according to good accounting practices:
  - Accurate, itemized, and detailed records of all receipts and expenditures
  - A current account and a periodic statement of the account for each member, designating the name and current address of each member who is obligated to pay assessments, the due date and amount of each assessment or other charge against the member, the date and amount of each payment on the account, and the balance due
  - All tax returns, financial statements, and financial reports
- A copy of the disclosure summary described in s. 720.401(1), Fla. Stat.
- Ballots, sign-in sheets, voting proxies, and all other papers and electronic records relating to voting by owners (must be kept for at least one (1) year after the date of the election, vote, or meeting)
- All affirmative acknowledgments made pursuant to s. 720.3085(3)(c)3., Fla. Stat.
- *All other written records of the association that are not specifically identified which are related to the operation of the association.*

Official Records Retention

- The official records must be maintained for **at least seven (7) years**, unless the governing documents of the association require a longer period of time.
- Bids received by the association for work to be performed, and records pertaining to elections, must be kept for **one (1) year**.

EFFECTIVE JULY 1, 2024

The association ***must*** adopt written rules governing the method or policy by which the official records of the association are to be retained and the time period such records must be retained. Such information must be made available to the owners through the association's website or application.

Official Records Not Accessible to Members

- Records protected by the **attorney-client or work-product privilege** relating to litigation
- Information obtained in connection with the approval of a **lease, sale, or other transfer of a parcel**
- Information obtained in a gated community in connection with guests' visits to owners or residents
- Social security numbers, driver license numbers, credit card numbers, e-mail addresses, telephone numbers, facsimile numbers, emergency contact information, any address other than as provided for association notice requirements, and other **personal identifying information**, excluding the person's name, lot designation, mailing address, and property address
  - **The association is not liable for the disclosure of protected information if the information is included in an official record and is voluntarily provided by an owner, not requested by the association.**

Official Records Not Accessible to Members

- **Personnel records** of association or management employees
- **Medical records** of owners or residents
- Any **electronic security measure** that is used by the association to safeguard data, including passwords
- The **association's software and operating system** which allows the manipulation of data, even if the owner owns a copy of the same software used by the association
- All affirmative acknowledgments made pursuant to s. 720.3085(3)(c)3., Fla. Stat.

The Attorney-Client Privilege

- **Any record protected by the lawyer-client privilege as described in s. 90.502; and any record protected by the work-product privilege**, including any record prepared by an association attorney or prepared at the attorney's express direction; which reflects a mental impression, conclusion, litigation strategy, or legal theory of the attorney or the association, and which was prepared exclusively for civil or criminal litigation or for adversarial administrative proceedings, or which was prepared in anticipation of such litigation or proceedings until the conclusion of the litigation or proceedings.
- Correspondence from the association's lawyer remains privileged unless the board votes to waive the privilege.
- **Only the board can waive the attorney-client privilege.**

Membership Directories

- An association may print and distribute to owners a directory containing the name, lot address, and all telephone numbers of each owner.
- An owner may exclude his or her telephone numbers from the directory by so requesting in writing to the association.
- An owner can also provide written consent to the disclosure of other contact information which is otherwise not accessible to the members.



Providing Rules and Covenants

EFFECTIVE JULY 1, 2024

- Before ***October 1, 2024***, an association ***must*** provide a physical or digital copy of the association's rules and covenants to every member.
- An association ***must*** provide a physical or digital copy of the association's rules and covenants to every new member.
- If the rules or covenants are amended, the association ***must*** provide every member with an updated copy of the amended rules or covenants. An association may adopt rules establishing standards for the manner of distribution and timeframe for providing copies of updated rules or covenants.
- The association can comply with this requirement by posting a complete copy of the rules and covenants, or a direct link thereto, on the homepage of the association's website if such website is accessible to the members of the association and the association sends notice to each member of the association of its intent to utilize the website for this purpose by:
    - E-mail to any member who has consented to receive notices by electronic transmission and provided an e-mail address to the association for that purpose AND
    - Mail to all other members at the address identified as the member's mailing address in the association's official records

Access to Official Records

- Unless otherwise provided by law or the governing documents, the official records **must** be made available for inspection and copying by an owner :
  - Within 45 miles of the community or within the county
  - Within **10 business days** after receipt of an owner's written request
- To comply with these requirements, the association may:
  - Have a copy of the records available for inspection or copying in the community
  - Make the records available electronically via the internet
  - Allow the records to be viewed in electronic format on a computer screen and printed upon request
- If the request is submitted by certified mail, return receipt requested, and access to the official records is not timely provided, there is a rebuttable presumption that the association ***willfully failed*** to comply.
- A member denied access to official records is entitled to actual damages or minimum damages for the association's willful failure to comply. The minimum damages are $50 per calendar day up to 10 days, the calculation to begin on the 11th business day after receipt of the written request.

Access to Official Records

NEW LAW EFFECTIVE JULY 1, 2024

If an association receives a subpoena for records from a law enforcement agency, the association ***must*** provide a copy of such records or otherwise make the records available for inspection and copying to a law enforcement agency within ***five (5) business days*** after receipt of the subpoena, unless otherwise specified by the law enforcement agency or subpoena. An association ***must*** assist a law enforcement agency in its investigation to the extent permissible by law.



Official Records Crimes

EFFECTIVE JULY 1, 2024

- Any director or manager who knowingly, willfully, and "repeatedly" (two or more violations in a 12-month period) fails to provide access to the official records, with the intent of causing harm to the association or one or more of its members, commits a second-degree misdemeanor.
- Any person who knowingly and intentionally defaces or destroys accounting records during the period in which such records are required to be maintained, or who knowingly or intentionally fails to create or maintain accounting records that are required to be created or maintained, with the intent of causing harm to the association or one or more of its members, commits a first-degree misdemeanor.
- Any person who willfully and knowingly refuses to release or otherwise produce association records with the intent to avoid or escape detection, arrest, trial, or punishment for the commission of a crime, or to assist another person with such avoidance or escape, commits a third-degree felony.

Official Records Rules

An association may adopt reasonable written rules governing the frequency, time, location, notice, records to be inspected, and manner of inspections.

HOWEVER

An association ***cannot***:

- Require an owner to show any proper purpose for the inspection
- Require an owner to state any reason for the inspection
- Limit an owner's right to inspect records to less than one 8-hour business day per month

Copying Records & Fees

- **Portable Device:** A member (or his or her authorized representative) is allowed to use a portable device (a smartphone, tablet, portable scanner, or any other technology capable of scanning or taking photographs) to make an electronic copy of the official records – FREE OF CHARGE.
- **Copies:** If the association has a photocopy machine available where the records are maintained, it must provide owners with copies on request during the inspection if the entire request is limited to no more than **25 pages**. The association **may** charge up to **25 cents per page** for copies made on the association's photocopier. If the association does not have a photocopier, or if the records requested to be copied exceed 25 pages in length, then the association may have copies made by an outside duplicating service and may charge the actual cost of copying, *as supported by the vendor invoice*.
- **Personnel Costs:** The association may charge for the costs required for personnel to retrieve and copy the records **if** the time spent retrieving and copying the records exceeds one-half hour **and if** the personnel costs do not exceed $20 per hour. Personnel costs **may not** be charged for records requests that result in the copying of 25 or fewer pages.

Association Website
s. 720.303(4)(b), Fla. Stat.

Website Requirements

EFFECTIVE JULY 1, 2024

- By ***January 1, 2025***, associations having ***100 or more parcels*** were required to create a website or downloadable mobile application for the posting of association documents.
- The association's website or application must be accessible through the internet and must contain a subpage, web portal, or other protected electronic location that is inaccessible to the general public and accessible only to owners and employees of the association.
- Upon written request by an owner, the association must provide the owner with a ***username and password*** and access to the protected sections of the association's website or application which contains the association's official documents.



Document Posting Requirements

A copy of the following documents must be posted on the website:

- The declaration of covenants, articles of incorporation, bylaws, and all amendments thereto
- The current rules of the association
- A list of all current executory contracts or documents to which the association is a party or under which the association or the owners have an obligation or responsibility and, after bidding for the related materials, equipment, or services has closed, a list of bids received by the association within the past year
- The annual budget and any proposed budget to be considered at the annual meeting
- The financial report and any monthly income or expense statement to be considered at a meeting
- The association's current insurance policies
- The certification of each director

Document Posting Requirements

Continued:

- All contracts or transactions between the association and any director, officer, corporation, firm, or association that is not an affiliated homeowners' association or any other entity in which an association director is also a director or officer and financially interested
- Any contract or document regarding a conflict of interest or possible conflict of interest
- Notice of any board meeting, the agenda, and any other document required for the meeting, which must be posted no later than the date required for the notice
- Notice of any membership meeting and the agenda for the meeting, at least 14 days before the meeting, posted in plain view on the homepage of the website, or on a separate subpage of the website labeled "Notices" which is conspicuously visible and linked from the homepage. The association must also post any document to be considered and voted on by the members during the meeting or any document listed on the meeting agenda at least seven (7) days before the meeting at which the document or information within the document will be considered.

Document Posting Requirements

- The association must ensure that the information and records which are not allowed to be accessible to owners, are ***not posted*** on the association's website or application.
- If protected information or information restricted from being accessible to owners is included in documents that are required to be posted on the association's website or application, the association must ensure the information is ***redacted*** before posting the documents.
- However, the association or its authorized agent is not liable for disclosing protected or restricted information unless such disclosure was made with a ***knowing or intentional disregard*** of the protected or restricted nature of such information.

SCAN QR CODE FOR SLIDES

HOA Record-Keeping & Records Access

Kaye Bender Rembaum
Attorneys At Law

Provider # 5092 | Kaye Bender Rembaum, P.L.

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Online: 9633961 | Classroom: 9633956

CAMS: OPP | One (1) CEU
Online: 9632789 | Classroom: 9632788

HOA Board Members: One (1) CEU

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THANK YOU FOR ATTENDING



HOMEOWNERS' ASSOCIATION RECORD-KEEPING AND RECORDS ACCESS

Presented by:

Alan Schwartzseid, Esq. B.C.S. (AS@KBRLegal.com)

Questions related to course & materials: Seminars@KBRLegal.com

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