



United States District Court

Louis et al. v. SafeRent Solutions, LLC et al.

Case No. 1:22-cv-10800-AK

Class Action Notice

Authorized by the U.S. District Court for the District of Massachusetts

Were you a housing voucher user denied rental housing in Massachusetts because of your SafeRent Score between May 25, 2020, and April 25, 2024?



There is a class action settlement of a lawsuit.
You may be entitled to money.



To receive money from this Settlement, or decide if you want to opt out or object, you should

1. read this Notice and
2. respond by September 3, 2024.

Important things to know:

- If you are a member of the Settlement Classes and you take no action, you will still be bound by the Settlement, and your rights will be affected.
- You can learn more at MATenantScreeningSettlement.com.
- *Puede obtener una copia de este aviso en español en MATenantScreeningSettlement.com.*

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ABOUT THIS NOTICE

WHY DID I GET THIS NOTICE?

This Notice is being sent to tell you about the settlement of a class action lawsuit, *Louis et al. v. SafeRent Solutions, LLC et al.*, brought on behalf of recipients of publicly funded housing vouchers whose SafeRent Score was below the minimum for an “accept” report on an application for rental housing in Massachusetts.

You received this Notice because, according to SafeRent’s records, you applied for housing in Massachusetts between May 25, 2020, and April 25, 2024, and the housing provider received a SafeRent Score below the “accept” score set by the housing provider. You may be a member of the group of people affected, called the “Settlement Classes.” You are only a Settlement Class Member if you were applying for rental housing in Massachusetts where you could use your voucher when your rental application was denied.

This Notice gives you a summary of the terms of the proposed Agreement, explains what rights Settlement Class Members have, and helps Settlement Class Members make informed decisions about what action to take.

This is an important legal document, and we recommend that you read all of it. If you have questions or need assistance, please go to MATenantScreeningSettlement.com or call (888) 344-0796.

Puede obtener una copia de este aviso en español en MATenantScreeningSettlement.com. Si tiene preguntas o necesita ayuda, visite el sitio web o llame al (888) 344-0796.

WHAT DO I DO NEXT?

Read this Notice to understand the Settlement and determine if you are a Settlement Class Member. Then, decide which of the following actions you would like to take:

YOUR OPTIONS	MORE INFORMATION ABOUT EACH OPTION
RECEIVE PAYMENT	You must submit a Claim Form, either by mailing in the paper form attached to this Notice or by submitting the form electronically at MATenantScreeningSettlement.com . You will be bound by the Settlement.
DO NOTHING	Get no payment and be bound by the Settlement. You will only be bound by the Settlement if you are a Settlement Class Member, as defined below (under “Learning About the Settlement”).
OPT OUT	Get no payment and not be bound by the Settlement. You must submit a request to be excluded from the Settlement.
OBJECT	Tell the Court why you don’t like the Settlement.

Read on to understand the specifics of the Settlement and what each choice would mean for you.

WHAT ARE THE MOST IMPORTANT DATES?

Your deadline to take action to receive payment is **September 3, 2024**. Your deadline to object or opt out is **September 3, 2024**. The Final Approval Hearing is **November 18, 2024**.

LEARNING ABOUT THE LAWSUIT

WHAT IS THIS LAWSUIT ABOUT?

Mary Louis and Monica Douglas filed a lawsuit in 2022 claiming that SafeRent violated fair housing and consumer protection laws by using its SafeRent Score product to make rental housing decisions for applicants in Massachusetts holding public housing vouchers.

Where can I learn more?

You can get a complete copy of the proposed Settlement and other key documents in this lawsuit by visiting MATenantScreeningSettlement.com.

SafeRent denies that it did anything wrong or violated any law, or that the claims have merit.

WHY IS THERE A SETTLEMENT IN THIS LAWSUIT?

The Court has not decided this case in favor of either side. The parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation. The Settlement will resolve the claims of all members of the Settlement Classes, including the Plaintiffs who brought the case.

What is a class action settlement?

A class action settlement is the resolution of a case for all of the affected persons in the class. It can provide money and changes to the practices that the plaintiffs claim caused harm in the first place.

WHAT HAPPENS NEXT IN THIS LAWSUIT?

The Court will hold a hearing to decide whether to approve the Settlement. Details about the hearing can be found below.

Where:

John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Courtroom 8, Third Floor
Boston, MA 02210

When: November 18, 2024

The Court has approved this Notice. Because the settlement of a class action affects the rights of all members of the proposed classes, the Court must give final approval to the Settlement before it can take effect. Payments will only be made if the Court approves the Settlement.

You don't have to attend the hearing, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the Settlement. If the Court does not approve the Settlement or the Parties decide to end it, it will be void and the lawsuit will continue. The date or time of the hearing may change, and if it does, the new date or time of the hearing will be posted on the Settlement Website, but there will be no additional mailed notice. To learn more and confirm the hearing date, go to MATenantScreeningSettlement.com or call (888) 344-0796.

LEARNING ABOUT THE SETTLEMENT

WHAT DOES THE SETTLEMENT PROVIDE?

SafeRent has agreed to pay \$1,175,000 into a Settlement Fund. This money will be divided among the Settlement Class Members and will also be used to pay the cost of administering this Settlement (expected to be between \$110,000 and \$135,000). Subject to court approval, this fund may also be used to provide up to \$10,000 each to the two people who brought this lawsuit, Mary Louis and Monica Douglas. Members of the Settlement Classes will “release” their claims as part of the Settlement, which means they cannot sue SafeRent based on the same conduct that led to this lawsuit. The full terms of the release can be found at MATenantScreeningSettlement.com.

The Settlement separately provides up to \$1,100,000 in attorneys’ fees and costs, dependent on court approval. If the Court does not award the full \$1,100,000, any money left over will be added to the Settlement Fund and distributed to Settlement Class Members.

The Settlement also requires SafeRent to make changes to the reports that housing providers can request so that it will not provide a SafeRent Score for applicants who the housing provider reports are applying using a housing voucher.

HOW DO I KNOW IF I AM PART OF THIS SETTLEMENT?

You are a Settlement Class Member and part of this Settlement if you meet either of the following criteria.

(1) You were a rental applicant who used a publicly funded housing voucher and sought but were denied housing in Massachusetts because of your SafeRent Score at any property using SafeRent’s tenant screening services between May 25, 2021, and April 25, 2024. This is called the “Massachusetts Income-Based Settlement Class.”

(2) You are Black or Hispanic and were a rental applicant who used a publicly funded housing voucher and sought but were denied housing in Massachusetts because of your SafeRent Score at any property using SafeRent’s tenant screening services between May 25, 2020, and April 25, 2024. This is called the “Massachusetts Race-Based Settlement Class.”

In plain language, if you were sent this Notice by the Settlement Administrator, and you tried to use a housing voucher to get housing between May 25, 2020, and April 25, 2024, you are likely covered by this Settlement. That is because SafeRent’s records show that a housing provider where you applied for housing in Massachusetts received a SafeRent Score that was below the “accept” score set by the housing provider.

If you are unsure of whether you are part of this Settlement, contact the Settlement Administrator at (888) 344-0796 or info@MATenantScreeningSettlement.com.

HOW MUCH WILL MY PAYMENT BE?

Your payment amount will depend on multiple factors:

- The payment amounts will depend on the number of Settlement Class Members who submit valid claims.
- Those who are members of both the Massachusetts Income-Based Settlement Class and the Massachusetts Race-Based Settlement Class will receive a share of the Settlement that is 1.5 times the share for those who are members of only one of the Settlement Classes.
- The payment amounts will also depend on the amount of awards and costs approved by the Court.

DECIDING WHAT YOU WANT TO DO

HOW DO I WEIGH MY OPTIONS?

If you are a Settlement Class Member, as defined above, you have four options. You can stay in the Settlement and take action to receive payment, you can opt out of the Settlement, you can object to the Settlement, or you can do nothing. This chart shows the effects of each option:

	<i>do nothing?</i>	<i>file a claim?</i>	<i>opt out?</i>	<i>object?</i>
Can I receive settlement money if I . . .	NO	YES	NO	YES
Am I bound by the terms of this lawsuit if I . . .	YES	YES	NO	YES
Can I pursue my own case if I . . .	NO	NO	YES	NO
Will the class lawyers represent me if I . . .	YES	YES	NO	NO

DOING NOTHING

WHAT ARE THE CONSEQUENCES OF DOING NOTHING?

If you are a Settlement Class Member and you do nothing by September 3, 2024, you will not get any money, but you will still be bound by the Settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against SafeRent based on the same conduct that led to this lawsuit. Please see the Agreement, which can be found at MATenantScreeningSettlement.com, for a full description of the claims and persons who will be released if this Settlement is approved.

FILING A CLAIM

HOW DO I GET A PAYMENT IF I AM A SETTLEMENT CLASS MEMBER?

If you wish to receive money, **you must submit a Claim Form by September 3, 2024.**

The Claim Form is attached to this Notice and available online at MATenantScreeningSettlement.com. Follow the instructions on the form to submit it. The form may be submitted by mail or electronically.

DO I HAVE A LAWYER IN THIS LAWSUIT?

In a class action, the court appoints class representatives and lawyers—called class counsel—to work on the case and defend the interests of the class members. If you want to be represented by your own attorney, you may hire one at your own expense. For this Settlement, the Court has appointed the following individuals and lawyers.

Settlement Class Representatives: Mary Louis and Monica Douglas

Settlement Class Counsel: Cohen Milstein Sellers & Toll PLLC, Greater Boston Legal Services, and the National Consumer Law Center. These are the entities that negotiated this Settlement on your behalf. Their contact information is below.

DO I HAVE TO PAY THE LAWYERS IN THIS LAWSUIT?

You will not have to pay the lawyers directly. Attorneys’ fees and costs awarded by the Court will be paid by SafeRent, separately from the Settlement Fund used to pay out Settlement Class Members’ claims.

To date, Settlement Class Counsel have not been paid any money for their work or out-of-pocket expenses in this case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, Settlement Class Counsel have requested that the Court approve a payment from SafeRent to them of up to \$1,100,000 total in attorneys' fees and expenses. Attorneys' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. Any unawarded fees out of the \$1,100,000 will be added to the Settlement Fund disbursed to Settlement Class Members. You have the right to object to the attorneys' fees even if you think the other settlement terms are fair.

OPTING OUT

WHAT IF I DON'T WANT TO BE PART OF THIS SETTLEMENT?

You can opt out. If you do, you will not receive payment and cannot object to the Settlement. However, you will not be bound or affected by anything that happens in this lawsuit and will keep any right you have to file your own case.

HOW DO I OPT OUT?

To opt out of the Settlement, you must send a letter to the Settlement Administrator that

- (1) is postmarked by September 3, 2024;
- (2) includes the case name and number (*Louis et al. v. SafeRent Solutions, LLC et al.*, Case No. 1:22-cv-10800-AK);
- (3) includes your full name and contact information (telephone number, email, and/or mailing address);
- (4) states clearly that you wish to be excluded from the Settlement; and
- (5) includes your signature.

Mail the letter to the following address:

MA Tenant Screening
Settlement Administrator
P.O. Box 2818
Portland, OR 97208-2818

OBJECTING

WHAT IF I DISAGREE WITH THE SETTLEMENT?

If you disagree with any part of the Settlement (including the attorneys' fees) but don't want to opt out, you may object to the Settlement. You must give reasons why you think the Court should not approve the Settlement and say whether your objection applies to just you, a part of the Settlement Class, or the entire Settlement Class. The Court will consider your views. The Court can only approve or deny the Settlement as is—it cannot change the terms of the Settlement. You may, but don't need to, hire your own lawyer to help you. If you choose to hire your own lawyer, you will do so at your expense.

To object, you must send a letter to the Court that

- (1) is postmarked by September 3, 2024;
- (2) includes the case name and number (*Louis et al. v. SafeRent Solutions, LLC et al.*, Case No. 1:22-cv-10800-AK);
- (3) includes your full name, address, and telephone number, and email address (if you have one);
- (4) states the reasons for your objection;
- (5) says whether either you or your counsel intend to appear at the Final Approval Hearing and your counsel's name; and
- (6) includes your signature.

Mail the letter to both of the following two places:

MA Tenant Screening Settlement Administrator P.O. Box 2818 Portland, OR 97208-2818	U.S. District Court for Massachusetts John Joseph Moakley U.S. Courthouse 1 Courthouse Way, Suite 2300 Boston, MA 02210
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KEY RESOURCES

HOW DO I GET MORE INFORMATION?

This Notice is a summary of the proposed Settlement. The complete Agreement with all of its terms can be found at MATenantScreeningSettlement.com. To get a copy of the Agreement, review other documents about the case, or get answers to your questions,

- contact Settlement Class Counsel (information below),
- visit the Settlement Website at MATenantScreeningSettlement.com, or
- access the Court Electronic Records (PACER) system online or by visiting the Clerk’s office of the Court (address below).

Resource	Contact Information
Settlement Website	MATenantScreeningSettlement.com
Settlement Administrator	MA Tenant Screening Settlement Administrator P.O. Box 2818 Portland, OR 97208-2818 (888) 344-0796 info@MATenantScreeningSettlement.com
Settlement Class Counsel	Christine E. Webber and Brian Corman Cohen Milstein Sellers & Toll PLLC 1100 New York Ave. NW Fifth Floor Washington, D.C. 20005 SafeRentSettlement@cohenmilstein.com (202) 848-1201 Todd S. Kaplan Greater Boston Legal Services 197 Friend Street Boston, MA 02114 GBLS-SafeRent-Settlement@gbls.org (617) 603-1734 Shennan Kavanagh National Consumer Law Center 7 Winthrop Square Boston, MA 02110 SafeRentSet@nclc.org (508) 319-9517
Court (DO NOT CONTACT)	U.S. District Court for Massachusetts John Joseph Moakley U.S. Courthouse 1 Courthouse Way, Suite 2300 Boston, MA 02210