

STERLING GLEN CRIMINAL HISTORY POLICY

Overview

The property is committed to upholding fair housing principles and ensuring equal access to its property regardless of applicants' backgrounds. In determining whether to approve an applicant to live in the community, the property will conduct the following three-step process:

- 1) Income and Credit Screening;
- 2) Limited Criminal Background Screening; and
- 3) Individual Assessment.

Each step is described in detail below.

Step One: Income and Credit Screening

First, the property will review an applicant's income and conduct a credit screening. If an applicant meets the property's income and credit criteria, the property will provide an applicant with a conditional offer of tenancy. The form of this letter (the "Conditional Offer Letter") is attached as Appendix A.

Step Two: Limited Criminal Background Screening

Second, if the applicant has met the property's income and credit criteria and received a conditional offer, the property will conduct a limited criminal background screening for all individuals age 18 and older who will reside in the apartment.

The limited criminal background screening will only consider:

- Felony criminal convictions related to the following categories of offenses: (1) property offenses,¹ (2) major drug offenses,² (3) fraud offenses,³ (4) major violent offenses against persons,⁴ and (5) sex offenses⁵. Any other category of offense will not be considered. These categories were identified because they involve conduct by a person whose tenancy may present a current direct threat of harm to others or the risk of substantial damage to the property of others.

¹ Property offenses include theft, burglary, vandalism, arson and other criminal damage to property.

² Major drug offenses include drug trafficking and the sale, smuggling, manufacture, or distribution of any controlled substance. This includes unspecified controlled substances. It also includes all 1st or 2nd degree controlled substance offenses. Major drug offenses do not include simple possession of a controlled substance or drug paraphernalia, nor any past conduct that has since been decriminalized.

³ Fraud offenses include identify theft, use of stolen checks, writing bad checks, counterfeiting, and forgery.

⁴ Major violent offenses include assault, battery, and homicide.

⁵ Sex offenses include rape, registration as a sexual offender, taking indecent liberties with a minor, pandering, sex trafficking, and sexual battery. Not included are victimless crimes such as prostitution or solicitation.

- Felony criminal convictions in the above listed categories where the conviction occurred within the last five years.

The property's limited criminal background screening will not consider arrests, charges, expunged convictions, convictions reversed on appeal, vacated convictions, offenses where adjudication was withheld or deferred, pardoned convictions, and sealed juvenile records. It will not treat people differently based on whether the applicant is on probation or parole.

Step Three: Individual Assessment

Third, if an applicant is identified as having a felony criminal conviction in one of the specified categories of offenses within the five years prior to the application ("covered criminal conduct"), the property will provide an individual assessment of the applicant's current situation before deciding whether to withdraw the conditional offer. The purpose of the assessment is to determine whether the applicant is able to fulfill the obligations of tenancy at the property.

The property will first send a written notice to each applicant identified as having covered criminal conduct that includes specific information from the background check that creates a concern. The notice will inform the applicant that covered criminal conduct was identified in the limited criminal background screening and will invite the applicant to provide additional information within fourteen (14) days for the property to consider. The requested information could include, for example, letters from parole officers, case workers, counselors, family members, or community organizations commenting on the applicant's responsible conduct and rehabilitation efforts. The form of this request letter (the "Additional Information Request Letter") is attached as Appendix B.

Based on information received from the applicant, as well as the information provided by the property's criminal background screening provider, the property will then conduct an individual assessment of each applicant identified as having covered criminal conduct. The property will consider all applicants equally and render decisions in a fair and consistent manner. The property will consider the following factors in determining whether to approve or reject the application:

- the facts or circumstances surrounding the criminal conduct;
- the age of the applicant at the time of the occurrence of the criminal offense;
- evidence of a good tenant or employment history before or after the conviction or conduct;
- evidence of rehabilitation efforts;
- the time that has elapsed since the occurrence of the conduct;
- any information about the applicant that indicates good conduct since the offense occurred;
- whether the conduct/conviction arose from the applicant's status as a survivor of domestic violence, sexual assault, stalking, or dating violence;
- whether the conduct/conviction arose from an applicant's disability, including mental illness; and
- any other information related to whether the applicant's specific criminal history creates the potential that the property's current residents, employees, or property will be exposed to a heightened risk of crime.

If an applicant does not provide information for the property's consideration within fourteen (14) days of the date of Additional Information Request Letter, the property will assess the applicant based upon available information obtained during the application process, including the information received from the property's credit and criminal background screening provider.

If, after the individual assessment described above, the property decides to reject an applicant, then on the day of such determination, the property will send to the applicant a Criminal Background Adverse Action Letter in the form attached hereto as Appendix C.

Disclosure

The property will disclose its three-step screening process to all applicants prior to the submission of an application.