

SCHOOL OF LAW THE UNIVERSITY OF TEXAS AT AUSTIN

Housing Policy Clinic • 727 East Dean Keeton Street Austin, Texas 78705 • 512-232-1564 • FAX 512-232-2311

January 7, 2024

Via electronic filing: regulations.gov

Ms. April Tabor Federal Trade Commission Office of the Secretary 600 Pennsylvania Avenue NW, Mail Stop H–144 (Annex J) Washington, DC 20580

Re: Unfair or Deceptive Fees NPRM, R207011

Dear Secretary Tabor,

We write to comment on the Federal Trade Commission's proposed Rule on Unfair or Deceptive Fees, published on November 9, 2023. Our comments are focused on the application of the proposed rule to address the prolific use of unfair and deceptive fees in the rental housing industry. Overall, we support the proposed rule and the Commission's efforts to eradicate these unlawful practices and their harm to renters. In this comment, we offer evidence for why the rule should be adopted, along with suggestions on how it could be improved. More specifically, this comment addresses questions 1, 2, 3, 9, and 14 from the Commission's Request for Comment.

I. <u>Background</u>

We base our comments on our recent experiences in The University of Texas School of Law's Housing Policy Clinic (HPC), where we researched and identified potential solutions to issues surrounding the growth of unfair and deceptive fees in the rental housing industry.¹ Our comments are also informed by the Clinic's ongoing representation of Building and Strengthening Tenant Action (BASTA), a nonprofit project based in Austin.² Through tenant organizing work with thousands of renters in Austin, Texas, BASTA has heard firsthand about the recent surge in unfair and deceptive fees in the rental housing industry and the crushing impact of these spurious fees on residents' housing security.

As documented by federal and private sources, unfair and deceptive fees—often referred to as "junk fees"—are increasingly being levied against tenants, disrupting their financial well-

¹ The Housing Policy Clinic at The University of Texas School of Law provides second- and third-year law students with the opportunity to work on hands-on policy projects to systemically advance low-income persons' access to affordable, just, and secure housing.

² See generally Our story, BASTA, <u>https://bastaaustin.org/en/story</u> (last visited Dec. 30, 2023).

being and housing stability.³ While the rental housing industry argues that additional junk fee regulations will limit housing affordability and availability,⁴ in reality, the industry actively promotes these fees as easy opportunities to increase costs for renters in order to "put that much more in [owners'] pockets."⁵ Furthermore, the rental housing industry's claim that fees are already adequately disclosed⁶ is simply not true, as documented further below. A leading industry website publicly touts the benefits of charging tenants "ancillary" fees rather than increasing rents "[s]ince prospective renters are still heavily focused on comparing the base rent to the base rent" at properties.⁷

II. <u>Answers to the Commission's Questions for Comment</u>

(1) Should the Commission finalize the proposed rule as a final rule? Why or why not? How, if at all, should the Commission change the proposed rule in promulgating a final rule?

We support the Commission's proposed rule regarding up-front disclosure of mandatory fees, which would require landlords to disclose mandatory fees as part of the total cost of

<u>content/uploads/imo/media/doc/financial service committee report.pdf</u> (noting that from 2018 to 2021 the five largest owners and operators of single-family rental homes in the United States increased annual fees by approximately 40 percent); Will Parker, *What's Worse Than Record High Rent? Record High Rent, Plus Fees,* THE WALL ST. J. (Sept. 5, 2023), <u>https://www.wsj.com/real-estate/whats-worse-than-record-high-rent-record-high-rent-plus-fees-4ddbd12f;</u> Irina Ivanova, *Rents are too damn high — and a scourge of "junk" fees is*

³ See, e.g., Majority Staff of H.R. Comm. on Fin. Servs., 117th Cong., June 28, 2022, Subcommittee on Oversight & Investigations Hearing Entitled, "Where Have All the Houses Gone? Private Equity, Single Family Rentals, and America's Neighborhoods," at 5 (June 23, 2022), <u>https://www.merkley.senate.gov/wp-</u>

making it worse, studies say, CBS NEWS (Apr. 14, 2023), <u>https://www.cbsnews.com/news/rent-inflation-junk-fees/</u>; *Fighting Junk Fees, Nat'l Consumer L. Ctr.* (Oct. 31, 2023), <u>https://www.nclc.org/fighting-junk fees/</u>; *Ariel Nelson et al, Too DAMN HIGH, NAT'L CONSUMER L. CTR.* (March 2023), https://www.nclc.org/wp-content/uploads/2023/03/JunkFees-Rpt.pdf.

⁴ See, e.g., Sharon Wilson Géno and Robert Pinnegar, Letter on behalf of the National Multifamily Housing Council and the National Apartment Association to the Senate Banking, Housing, and Urban Affairs Subcomm. On Financial Institutions and Consumer Protection (Jul. 24, 2023),

https://www.nmhc.org/globalassets/advocacy/comment-letters/2023/2023-07-24-nmhc-naa-letter-to-senate-banking-subcommittee-for-hearing-on-rental-

fees.pdf?utm_medium=email&utm_source=apartmentwire&utm_campaign=nmhc_news.

⁵ R. Lee Harris, *Bolstering the Bottom Line*, HOUSING FINANCE MAGAZINE, (Oct. 1, 2011),

https://www.housingfinance.com/management-operations/bolstering-the-bottom-line_o; see also Andrew Smallwood, Property Management Revenue: How Can Managers Increase Ancillary Revenue?,

https://www.secondnature.com/blog/how-pms-can-sustainably-drive-ancillary-income ("In short, property managers should figure out what's important to their residents and clients and monetize those things."); Brent Williams, *What are the Top 10 Most Commonly Collected Types of Ancillary Income?*, MULTIFAMILY INSIDERS (Apr. 29, 2019), https://www.multifamilyinsiders.com/multifamily-blogs/what-are-the-top-10most-commonly-collected-types-of-ancillary-income; Barbara Ballinger, *What's New in Ancillary Income*, NATIONAL APARTMENT ASSOCIATION (Oct. 25, 2022), https://www.naahq.org/whats-new-ancillary-income. ⁶ Mary Salmonsen, *FTC drafts ban on junk fees*, MULTIFAMILY DIVE (Oct. 17, 2023),

https://www.multifamilydive.com/news/ftc-ban-junk-fees-rent/696816/ (citing statement by the National Apartment Association CEO).

⁷ Chris Wood, *Apartment Operators Boost Operating Income with Ancillary-Revenue Programs*, MULTIFAMILY EXECUTIVE (May 17, 2011), <u>https://www.multifamilyexecutive.com/property-management/apartment-operators-boost-operating-income-with-ancillary-revenue-programs_o</u>.

renting a home, through any offers, displays, or advertisements listing the rental price. Renters, who make up approximately 36 percent of all U.S. households,⁸ are confronting a growing range of surprise charges from their landlords. For example, in the application process, tenants are exposed to surprise application and administrative charges.⁹

Subsequently, after paying hefty application fees, many tenants discover while signing their leases (or as late as when they receive their first monthly bill) that they are on the hook for additional mandatory charges such as valet trash fees, pest control fees, facility fees, and cable and internet fees.¹⁰ This lack of transparency robs tenants of their opportunity to fairly participate in comparison shopping in the rental housing market and can seriously disrupt their financial well-being and housing stability.¹¹ The proposed rule would eliminate the surprise nature of these mandatory fees. This would allow tenants to comparison shop and better understand the commitment they are making to a landlord before forking over their application fee and getting locked into a year-long, or even longer, lease term.

In addition to supporting the Commission's proposed rule as it applies to the disclosure of mandatory fees in the rental housing industry, we urge the Commission to modify the proposed rule to address the additional unfair and deceptive fee-related practices, which we discuss in more detail in our responses below to questions 2 and 9:

- 1) landlords' failure to disclose optional (or "quasi-optional") fees prior to collecting application fees from tenants, especially for apartment amenities that renters could reasonably assume would be included in rent; and
- 2) landlords' failure to inform tenants about how they can opt out of "optional" ancillary service fees, thus calling into question the optional nature of the fees.

These practices perpetuate the misrepresentation of the total costs of goods and services and the nature and purpose of fees.

We further urge the Commission to amend the proposed rule—or engage in additional rulemaking—to address other types of abusive practices related to junk fees in rental housing that are not addressed by the proposed rule. These harmful practices include: (1) charging renters fees for mandatory ancillary services that far exceed the landlord's cost of providing such services; (2) charging tenants fees for mandatory services tied to a particular service provider, such as property insurance and cable providers, thus preventing competition, (3) increasing fees and rent in the middle of a lease; and (4) charging tenants

⁸ Drew Desilver, *As national eviction ban expires, a look at who rents and who owns in the U.S.*, Pew Research Center (Aug. 2, 2021)

⁹ See, for example, Attachment A, which includes lease quotes provided for Altura Apartments and the Preserve at Hyde Park Apartments-Avenue A, which fail to list \$100-\$200 in administrative charges at the properties.

¹⁰ See, for example, the comparison in Attachment A between the lease quotes provided by Altura Apartments, Preserve at Hyde Park Apartments-Avenue A, Mueller Flats Apartments, and Windsor Burnet Apartments, and the fee schedules for these properties as reported by Apartment Trends, a multifamily market data company.

¹¹ See generally Ariel Nelson et al, TOO DAMN HIGH, NAT'L CONSUMER L. CTR. (March 2023), https://www.nclc.org/wp-content/uploads/2023/03/JunkFees-Rpt.pdf.

exorbitant fees and penalties to remediate damages at the property, in violation of the common law doctrine against liquidated damages.¹²

(2) Please provide comment, including relevant data, statistics, consumer complaint information, or any other evidence, on each different provision of the proposed rule.

Attachment A includes examples of a common practice we came across in our research on Austin apartments: landlords failing to disclose mandatory fees in the rental housing application process. At properties where this practice exists, when prospective tenants secure a quote for a unit, the quote fails to disclose all of the recurring and one-time fees that the tenant must pay as a condition of renting the apartment. The low-income tenants whom BASTA works with in Austin also report routinely confronting surprise fees from landlords after committing to a one-year lease, imposing financial strain on already cost-burdened tenants, and adding barriers to affordable housing access.

At one of the properties where BASTA works with tenants, Altura Apartments, the prices advertised for individual apartment units on the property's website do not list any of the \$142 in monthly fees that Altura Apartments tenants must pay.¹³ These fees include a \$15 facilities fee, \$7 pest control fee, and \$85 "cable/internet" fee for services that tenants are unable to opt out of. For tenants with pets, the landlord also charges "pet rent" of \$25 per pet a month, along with a one-time \$300 non-refundable fee per pet. With a maximum limit of three pets, pet-related fees alone can quickly add up to \$1,800 over the course of a year. On top of all these charges, prospective tenants must pay a \$75 application fee for each person on the lease, along with a \$200 "administrative fee."¹⁴ The lease quotes provided to tenants eventually disclose *some* of these fees, but only after the tenant provides detailed personal information to the landlord, including copies of pay stubs and employment information. Even after tenants provide the landlord their personal information, the lease quote fails to disclose all of the property's mandatory fees.¹⁵

Additionally, we learned through our research that some tenants must pay for services even though they do not use them. One Altura Apartments tenant, for example, must pay a monthly valet trash fee even though she chooses to take her trash to the dumpster. She does not use the valet trash service because the bin gets picked up infrequently, allowing pests and stray animals to get into the cans, knock them over, and spread trash outside her home. Additionally, she is required to pay for a cable and internet package each month, even though she does not own a television since she works two jobs, which leaves her little free time. Another Altura Apartments tenant learned that his apartment was not even wired to provide cable, even though he was being charged a monthly cable fee. He had to pay a cable provider to install a cable wire, incurring an additional cost.

¹² Ariel Nelson et al, Too DAMN HIGH, NAT'L CONSUMER L. CTR., at 4 (March 2023), <u>https://www.nclc.org/wp-content/uploads/2023/03/JunkFees-Rpt.pdf</u>.

¹³ See Attachment A.

¹⁴ Id.

¹⁵ Id.

Altura Apartments tenants have also reported to BASTA that their landlord is charging them to participate in a monthly security deposit fee program, even though they did not consent to enrolling in the program. One tenant at the property was offered a move-in special, under which he believed that the security deposit was waived. After the promotion was over, the property began charging him a surprise monthly security deposit fee.

Types of junk fees that landlords charge renters

The following are a few of the additional examples of junk fee problems that we came across in our research:

- **Insurance fees**. These fees can include payments to cover insurance for a landlord's property, as well as fees tenants must pay when they do not carry renter's insurance. Tenants at Creeks Edge Apartments and Altura Apartments, both in Austin, reported to BASTA that their landlords require them to pay a monthly insurance charge to management that only covers damage to a unit, not a tenant's personal belongings. Confusingly, some complexes call this "renter's insurance," likely leading tenants to mistakenly believe that they are paying to insure their personal belongings.
- Valet trash and other trash collection fees. Per a recent Austin-based study, valet trash fees are among the most common junk fees charged to tenants, ¹⁶ even though, if given the choice, most tenants would opt to not use the service.¹⁷ Valet trash fees have been charged even in facilities with trash chutes on every floor.¹⁸
- **Cable and technology package fees**. Fees for cable and internet are often mandatory, even if a tenant does not want to subscribe to those services.¹⁹ For example, tenants at Stonegate Mobile Home Park in Austin received notice in the middle of their lease term about a new mandatory cable fee they would have to pay. Tenants at the Hyde Park Preserve Avenue A Apartments in Austin are charged \$75 for mandatory "cable/internet" services; this fee is not disclosed on the property's leasing site or in the application process.²⁰
- **Pest control fees**. Monthly fees for pest control services have become one of the most ubiquitous mandatory fees that landlords are charging Austin renters, per a recent Austin-based study.²¹ Most of the fee schedules we came across in our research include a mandatory monthly fee for pest control services. For example, all eight apartment complexes within the Preserve at Hyde Park portfolio of Austin apartments charge a monthly pest control fee of \$12 per unit, which is not disclosed to tenants in lease quotes. The tenants at Creeks Edge Apartments in Austin are also

¹⁶ Elizabeth J. Mueller, *Improving housing conditions and stability for residents of "Naturally Occurring Affordable Housing" in Austin, Texas*, at 9, available at

https://utexas.box.com/s/8mgxs41lv4z7yc272xjhfctiurnugxgo.

¹⁷ Ariel Nelson et al, Too DAMN HIGH, NAT'L CONSUMER L. CTR., at 6 (March 2023), https://www.nclc.org/wp-content/uploads/2023/03/JunkFees-Rpt.pdf.

¹⁸ Id. at 26.

¹⁹ Id.

²⁰ See Attachment A.

²¹ Elizabeth J. Mueller, *Improving housing conditions and stability for residents of "Naturally Occurring Affordable Housing" in Austin, Texas*, at 9, available at

https://utexas.box.com/s/8mgxs41lv4z7yc272xjhfctiurnugxgo.

charged mandatory monthly pest control fees, with tenants reporting that the apartments are not actually treated for pests on a monthly basis.

- **Payment type fees**. These fees, which are sometimes called convenience fees or processing fees, add a charge depending on the method a tenant uses to pay rent.²² Tenants in Austin have reported to BASTA paying a convenience fee regardless of the type of payment they use.
- **Punitive fees for damages and "community rules" violations**. These fees include charges for litter and repairs to a property that far exceed the actual cost a landlord incurs to remediate the property. These fees can include charges for violation of property rules governing tenant conduct at the property—rules tenants may not even be aware exist. For example, after a new management company took over an Austin apartment complex, tenants started being charged excessive fees such as \$300 for having a grill on their deck and \$175 for leaving a plastic bag and half-empty water bottle on their porch.²³

(3) Would the proposed rule, if promulgated, benefit consumers and competition?

Price transparency benefits consumers and competition not only in the rental housing industry but across the market. Disclosure requirements such as the ones proposed through this rulemaking allow consumers to comparison shop. Furthermore, in the rental housing industry specifically, there is a power imbalance between landlords and tenants. The unfortunate reality is that once tenants have invested time and money into renting a home, many simply do not have the resources to back out of the transaction when misleading or deceptive pricing practices are finally uncovered. Disclosure requirements help address this imbalance by ensuring tenants have equal access to pricing information before paying an application fee or being locked into a lease agreement. When fees are disclosed, tenants can decide which fees they are willing to pay. In the collective, this sends a strong market signal to landlords about which ancillary services they should or should not be charging extra for.

(9) Is the proposed rule adequate to address the two practices identified as prevalent, misrepresenting the total costs of goods and services by omitting mandatory fees from advertised prices and misrepresenting the nature and purpose of fees? Are there additional provisions necessary to prevent these practices in specific industries?

As discussed above, we recommend several changes to the proposed rule to better protect renters from misrepresentations about the total costs of services and the nature and purpose of fees charged in the rental housing industry. We discuss these changes here in more detail.

²² Ariel Nelson et al, Too DAMN HIGH, NAT'L CONSUMER L. CTR., at 16 (March 2023), https://www.nclc.org/wp-content/uploads/2023/03/JunkFees-Rpt.pdf.

²³ Interview with Shoshana Krieger, Project Dir., Building and Strengthening Tenant Action, in Austin, Tex. (Oct. 2, 2023).

Disclosure of "optional" ancillary goods and services

First, we recommend that the Commission expand the proposed rule to require disclosure of all optional ancillary goods and services before a business collects an application fee or other charge from consumers related to the underlying service. Section 464.3 of the proposed rule does not require disclosure of fees for optional ancillary services until a consumer consents to pay for the good or service for which a fee is charged. However, this means that a prospective tenant may pay hundreds of dollars in application and administrative fees before discovering that a landlord is charging them for services or amenities that the tenant could reasonably assume were included in the previously disclosed rental price for the unit, such as parking and access to the property's common facilities.

For example, under the current proposed rule, a tenant who relies on their car to get to work could pay over \$300 in application and administration fees without ever receiving information about fees for accessing the complex's parking until they are presented with the lease agreement for their unit. Such a tenant would have to decide then whether to pay more than they expected for their unit or forgo their application and administration fees and search for a different unit.

Attachment B includes an example of an apartment that is already providing up-front disclosure of fees for optional "add-on" services before prospective tenants submit an application fee for a unit. This example illustrates that requiring up-front disclosure of fees for optional goods and services would not burden the rental housing industry.

<u>Clarification of when a good or service is "ancillary"</u>

Relatedly, we recommend that the proposed rule clarify when a service is considered "ancillary" versus a core part of the goods or services being purchased. This is critical since, under Section 464.2 of the proposed rule and the definition of "Total Price" in 464.1(g), fees for ancillary goods and services must be disclosed in advertising materials only if they are mandatory, whereas fees for non-ancillary goods and services must always be disclosed in advertising materials.

The overview and scope of the proposed rule provides some additional clarification regarding the meaning of an "ancillary" good or service, by stating that an ancillary good or service would include goods or services not necessary to render the primary good or service fit for its intended use. Unfortunately, the proposed rule leaves open opportunities for exploitation; this clarification still allows too much opaqueness around when particular services are ancillary, especially in regard to amenities at rental properties. Is access to the swimming pool at a rental property an ancillary service? What about mail service to the property? Including a definition of ancillary goods and services, and specific examples in the rule, could help eliminate this confusion and the related opportunities for abuse.

Disclosure regarding opting into and out of optional ancillary services

As discussed above, in our research we discovered several instances where landlords called ancillary services "optional," but tenants did not knowingly opt into receiving the services and were not provided any information about how to opt out of the services. To combat this issue, the rule should include stronger protections to ensure that consumers have knowingly opted into ancillary goods and services and have the ability to opt out of them. In this regard, Section 464.3 should require businesses to clearly and conspicuously disclose to consumers the process for opting into and out of optional ancillary goods and services, as part of disclosing the nature and purpose of the fee. In order for a good or service to be considered optional, Section 464.3 should also explicitly require disclosure to consumers about the optional nature of the service or good as part the disclosure concerning the nature and purpose of the fee.

Overall, requiring up-front disclosure of fees for optional ancillary services prior to a consumer incurring application expenses, along with ensuring consumers have knowingly opted into receiving these services, will better protect consumers from businesses that misrepresent the total costs of goods and services and the nature and purpose of the fees they charge.

(14)-(14)(c) Should a new definition of "Covered Business" be added to narrow the Businesses covered by specific requirements of the rule, in particular the preventative requirements in § 464.2(b)?... Should the definition of "Covered Business" be limited to businesses in the live-event ticketing and/or short-term lodging industries?... Should a definition of "Covered Business" exclude businesses to the extent that they offer or advertise credit, lease, or savings products, or to the extent that they extend credit or leases or provide savings products to consumers?

Regardless of whether the Commission adds a new definition of "Covered Business" to the rule, it is essential for the rule to cover the rental housing industry in order to mitigate the harmful impacts of unfair and deceptive fees on renters. Contesting fees is especially difficult, if not impossible, for a renter.²⁴ If a tenant does not pay a fee, Texas landlords have regularly applied the tenant's rent payment towards the fee before applying it to rent,²⁵ subjecting the tenant to a range of harsh consequences from late rent fees all the way to eviction.²⁶ Unpaid fees may also become an alleged rental debt, subjecting renters to collection lawsuits and negative credit reports, creating long-term barriers to housing access.²⁷

III. <u>Conclusion</u>

In summary, now more than ever, additional safeguards are critical to protect renters from the harmful effects of junk fees. We support the Commission's efforts to provide some of these safeguards through its proposed Rule on Unfair or Deceptive Fees. By addressing

²⁵ See Section 8, page 3, Residential Lease, TEXAS ASSOCIATION OF REALTORS, at 3 (2022),

<u>http://content.har.com/FormManager/pdf/79.pdf</u> (providing that the landlord may first apply funds received from a tenant to the tenant's non-rent obligations).

²⁴ Ariel Nelson et al, Too DAMN HIGH, NAT'L CONSUMER L. CTR., at 8, 24 (March 2023), https://www.nclc.org/wp-content/uploads/2023/03/JunkFees-Rpt.pdf.

²⁶ Ariel Nelson et al, Too DAMN HIGH, NAT'L CONSUMER L. CTR., at 7, 20 (March 2023), https://www.nclc.org/wp-content/uploads/2023/03/JunkFees-Rpt.pdf.

²⁷ *Id.* at 12-13.

unfair and deceptive fees through enhanced disclosure requirements, the rule goes a long way towards eliminating surprise fees and improving renters' ability to comparison shop in the housing marketplace. To further bolster the safeguards provided in the proposed rule, we respectfully encourage the Commission to expand the rule as discussed above. We appreciate the opportunity to provide these comments and are happy to answer any questions you may have.

Sincerely,

/s/ Madison DeLuca Law Student Housing Policy Clinic The University of Texas School of Law /s/ Elizabeth Blackford Law Student Housing Policy Clinic The University of Texas School of Law

Attachment A: Examples of Rental Properties Failing to Disclose Mandatory Fees

Altura Apartments Lease Quote

Quote created in September 2023. Names of applicants have been removed.

	1 Bed 1 Bath Unit 25-106 - Crest - 1x1 - 660 sqft at Avesta Altura
The second secon	Rent \$933 Term 13 Months Sq. Ft. 660 Floor 1
Reference of the second	Available Jan. 6 Apply Contact

The website for this property does not disclose mandatory fees with the total rent.

Quote Details

Lease Details	
Unit Number	25-107
Lease Term Length	10 Months
Move-In Date	October 3, 2023
Total Monthly Charges	\$1,371.00
Total Due by Move-In	\$350.00
Monthly Recurring Charges	
Rent	\$1237.00
Cable/Internet Charges	\$85.00
Waiver Deposit Fee	\$34.00
Facilities Fee	\$15.00
One-Time Charges	
Administrative Fee	\$200.00
Application Fee:	\$75.00
Application ree.	

The lease quote provided to a prospective tenant at the property disclosed some fees but failed to disclose the following additional mandatory recurring fees charged to tenants (see the following page): pest control (\$7), trash (\$32), and administrative billing (\$3). The lease quote also failed to disclose the mandatory one-time utility service connection fee (\$5). **Altura Apartments Fee Schedule, 2023**



Proudly Managed by



Application Fee: \$75 per person Administrative Fee \$200 <u>Deposits:</u> \$0 Deposit Community Security Deposit Monthly Waiver Fee: \$34

<u>Reserved Parking</u> Monthly covered parking \$75 Monthly uncovered reserved parking \$50

<u>Pets</u> No Breed/Weight Restrictions Maximum of 3 Pets Pet Rent \$25 monthly per pet One time non-refundable pet fee \$300 per pet

Monthly Recurring Charges Trash \$32.00 Pest Control \$7.00 Cable/Internet \$85 Facilities fee \$15 Administrative billing fee \$3 Allocated Water/ Waste Water One time utility service connection fee \$5 Renters insurance is required Electricity with Austin Energy

The Preserve at Hyde Park Avenue A, Lease Quote, December 2023

Quote Summary

Review your quote and apply before your choices expire.

THE PRESEDUE		Quote	
HYDE PARK		Quote	495534
		Expires	March 3, 2024
1 and 1		Lease Information	
		Lease Term	12 months
A1 550sf		Lease Start	January 14, 2024
Apartment	#110	Lease End	January 13, 2025
Floor Level	1		
Bedrooms	1	Application Deposits And Fees	
Bathrooms	1	Online Application Fee	\$55.00
Square Feet	550		
Occupancy	2	Monthly Charges 🌗	
Deposit	\$300.00	Gross Rent	\$1,050.00
Effective Rent	\$1,050.00	Total Monthly Charges	\$1,050.00

The lease quote does not inform applicants about any of the additional mandatory fees charged to tenants at the property (see fee schedule below), other than the online application fee. Mandatory fees excluded from the lease quote include the administrative fee of \$100, trash/recycle flat fee of \$15, pest control fee of \$12, and cable/internet fee of \$75.

The Preserve Hyde Park Fee Schedule*

Application Fee	\$ 55.00	Trash/Recycle Flat Fee	\$ 15.00	
Administrative Fee	\$ 100.00	Pest Control	\$ 12.00	
Security Deposit	\$ 300.00	Cable/Internet	\$ 75.00	Only @Avenue A
Pet Deposit	\$ 150.00			
Pet Fee	\$ 150.00			
Pet Rent	\$ 20.00			

Windsor Burnet Apartments, Lease Quote, January 2024

Wel	come to V	Windsor	Burne	t
Ren	tal Quote	Sheet		
		e: Saturday, Janua wary 13, 2024 Lea Summary	se End Date: Sunc	use Term: 12 Lease Start Iay, January 12, 2025 ms: 2
\$	Move-in Ch These are the cha your roommate if pay upon move-ir	irges you (and applicable) will	These are th	r Charges he charges you (and ate if applicable) will ponth.
	Rent for 19 days Deposit	\$1,326.94 Pending ***	Rent	\$2,165.00
	Total Charges *** Deposit is not include charges. It will be charg move-in.			

The lease quote does not inform applicants about the following mandatory fees charged to tenants at the property (see fee schedule below): valet trash fee of \$35, pest control fee of \$5, and \$20 in other non-optional fees.

		\$ Include	\$ Amount				
Technology Pkg	-	-	\$0	Pets	 Image: A set of the set of the	Lease Term	12-15
Valet Trash	 Image: A set of the set of the	×	\$35	Pet Deposit (Sngl)	\$0	App. Fee	\$65
Trash Cost (Non-Valet)	×	-	\$0	Pet Fee	\$500	Admin. Fee	\$0
Pest Control	 Image: A second s	×	\$5	Pet Rent	\$25	Locator Fee	0%
Other Non-Opt. Fees	 Image: A set of the set of the	×	\$20	Req. Renters Ins.	× .	Other Fees	\$0
Total Fees			\$60	Rent Program		Ya	rdi
				Rent Basis		Ba	ise

Fee Schedule For Windsor Burnet Apartments

Mueller Flats, Lease Quote, January 2024

JOTE SHEET	Sack to Leasing Optio		
Plan: 1 bedroom / 1 bath Terms: ApartmentM061			
e Terms: ApartmentM061	.7 12 months	1/6/2024 - 1/5/2025	
Monthly Charges			
Rent	\$1,079	Main charge	
Cable / Internet	\$79	Included	\$1,158 per month
Move-In Charges			
Rent for 26 days	\$904.97		\$1,471.23 due upon
Deposit	\$500		move-in
			111010 111

The lease quote does not inform applicants about the following mandatory fees charged to tenants at the property (see fee schedule below): valet trash fee of \$26 and pest control fee of \$3.

Mueller Flats Fee Schedule

		\$ Include	\$ Amount				
Technology Pkg	-	-	\$0	Pets	 Image: A set of the set of the	Lease Term	6-12
Valet Trash	 Image: A set of the set of the	×	\$26	Pet Deposit (Sngl)	\$150	App. Fee	\$50
Trash Cost (Non-Valet)	×	-	\$0	Pet Fee	\$250	Admin. Fee	\$0
Pest Control	 Image: A set of the set of the	×	\$3	Pet Rent	\$25	Locator Fee	0%
Other Non-Opt. Fees	×	-	\$0	Req. Renters Ins.	 Image: A second s	Other Fees	-
Total Fees			\$29	Rent Program		Yar	di
				Rent Basis		Bas	se

Attachment B: Examples of Rental Properties Disclosing Mandatory Fees

Bell SouthPark Apartments, Lease Quote, January 2024

or Plan: 1 bedroom / 1 bathroo	om 618Sq.Ft.	A1A-M	
se Terms: Apartment7211	12 months 2	/9/2024 - 2/8/2025	
Monthly Charges			
Rent	\$1,315	Main charge	
Pest Control Fee	\$4	Included	¢1 270 per menth
Valet Trash Fee	\$35	Included	\$1,379 per month
Amenity Fee	\$25	Included	
Move-In Charges			
Rent for 21 days	\$952.24		
Pest Control Fee	\$2.90		\$998.58 due upon
Valet Trash Fee	\$25.34		move-in
raide mabilities			

The Bowen Apartments, Lease Quote, January 2024

ie Leasing Justomize Jse this opport	unity to custor	nize your new apartment.	
		Add Ons	
		Short Term Premium \$300.00 Monthly	
► A3			
Apartment	#109		
Floor Level	1		
Bedrooms	1		
Bathrooms	1		
Square Feet	795		
Occupancy	3		
Deposit	\$750.00		
🛆 Lease Te	rms		
Term	12 months		
Rent	\$2,485.00		
Additiona	I Services		
Community Fee	\$75.00		
Package Concierge	\$10.00		
Pest Control Services	\$5.00		
Trash Service	\$10.00		
Trash Service - door to door pickup	\$25.00		
Monthly	\$2,610.00		