

APPLICATION FOR
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) ENTITLEMENT PROGRAM
 — 2015 Program Year Funding —

ACTIVITY NAME: 195 DIVISION STREET, NEW CONSTRUCTION AFFORDABLE HOUSING
 APPLICANT: HABITAT FOR HUMANITY OF NORTHERN SARATOGA, WARREN & WASHINGTON
 MAILING ADDRESS: 4 GLENS FALLS TECHNICAL PARK, SUITE 4 COUNTIES
GLENS FALLS, NY Zip: 12801
 PHONE: 588 8860 FAX: _____ EMAIL: president@glensfalls.habitat.org
 CONTACT PERSON: TAMMY D. CARA TITLE: PRESIDENT

APPLICANT (select 1): City Department Private non-profit organization Other Public Agency
 _____ (List Dept.) _____ (List Federal ID #) _____ (Specify)
22-3476475
 _____ (DUNS #)

NATIONAL OBJECTIVE (select 1):
 "Benefit persons of Low/moderate income"
 L/M Income Area Benefit
 L/M Income Limited Clientele Activities
 L/M Income Housing Activities
 L/M Income Job Creation/Retention
 "Address slum/blight Conditions"
 "N/A" Slum/blighted Area
 Slum/blighted Spot Basis
 "N/A" Urban Renewal Completion
 "Urgent CD Need"
 "N/A" Urgent Need

REQUESTED ENTITLEMENT FUNDING: \$ 65,000
 Funding Leveraged from Other Sources: \$ 65,000
 Total Activity Cost: \$ 130,000

Proposal Abstract - please provide a *brief* overview of your proposal including the number of persons that will be served with this grant in the space below:

Habitat for Humanity builds simple, decent homes for low-moderate income families, using community volunteers and donated materials. We are in partnership with the City of Saratoga Springs, Saratoga Builders Association's Rebuilding Together Saratoga to build a new home at 195 Division Street. This project is designed to provide a Saratoga Springs family with the opportunity to own their own home. A family is typically a couple with two school-aged children. We currently build one house per year. This partnership is an opportunity to increase the number of families we convert to home ownership while creating affordable housing in Saratoga Springs.

Tammy D. Cara
 (Authorized Signature)
TAMMY D. CARA
 (Typed or Printed Name)

PRESIDENT, HABITAT FOR HUMANITY
 (Title)
1/30/15
 (Date)

195 DIVISION STREET: BRINGING DIVISION TOGETHER

Habitat for Humanity of Northern Saratoga, Warren & Washington Counties builds simple, decent homes for families in need. Using primarily volunteer labor and donated materials, we are able to build a new home at a discounted cost. We then sell the house to our "Partner Family" with a zero interest, 30 year mortgage for only the build cost. Habitat holds a silent 2nd mortgage (defined as the difference between the cost and the appraisal). Habitat forgives a corresponding percent of that 2nd mortgage payment for every year the homeowner keeps current on their payments, meaning a Homeowner in good standing pays only for the construction of their home and builds equity.

Since our creation in 1991, we have built or rehabilitated 24 homes, one home a year in one of the three counties we service. In Spring 2015, we have two Builds scheduled in Saratoga County: Build #26, 8 Baker Avenue, Moreau and Build #25, 195 Division Street, Saratoga Springs.

The City of Saratoga Springs recently provided an historic opportunity with their generous donation of two lots in Census Block 610.001, 195 Division Street and 26 Cherry Street. 195 Division Street is scheduled for new construction Spring 2015. 26 Cherry Street is scheduled for demolition Spring 2015, and new construction of a duplex Spring 2016. The two lots were donated by the City under the guidelines of a structured Workforce Partnership.

The Workforce Partnership is a multi-organizational partnership collaboration between Habitat for Humanity, the City of Saratoga Springs, the Saratoga Builders Association and Rebuilding Together Saratoga County. The purpose of the Workforce Partnership is to convert these properties (a vacant lot and a demolition, respectively) into permanent affordable housing for current Saratoga Springs families.

Providing Permanent Affordable Housing to Saratoga Springs residents and workforce is a high priority objective for the City of Saratoga Springs. The new construction of Affordable Housing at 195 Division Street provides many mutual benefits and satisfies local and national objectives:

- Creation of a permanent residential structure in the affordable housing category in a designated low-moderate income area
- 100% of the entitlement grant will assist persons of low-moderate income
- Returns formerly delinquent properties to the tax rolls
- Provides a permanent home for a family with children
- Owner occupied homes improve the stability and character of the community.
- Homeownership substantially improves the environment for children moved from substandard housing to a permanent home. Children have a better outlook and model for adult life, and greater stability, which allows them to focus on personal and academic development and become more integrated in the community.

The 195 Division Street build Workforce Partnership collaboration between the City of Saratoga Springs, Habitat for Humanity, the Saratoga Builders Association, and Rebuilding Together Saratoga County is a great effort toward the goal of Bringing Division Together!

1. ACTIVITY DESCRIPTION

New Construction of a home for a low-moderate income Saratoga Springs family, at 195 Division Street, a low-moderate income area with recent extensive neighborhood revitalization development.

- A) For the past 24 years, we have built or rehabilitated one house a year in one of the three counties we serve. This year, we move forward on building two homes, both in Saratoga County. We have an ongoing focus to grow our affiliate from one to multiple homes per year so that we can better service the community and specifically address the need for Workforce housing in the City of Saratoga Springs. The generous donation from the City of Saratoga Springs plus the support of the Workforce Partnership is allowing us the opportunity to move forward with two Builds this Spring. As our current structure successfully accommodates one Build per year, we are stretching to fund 3 projects simultaneously. With two active build sites and a demolition project slated for Spring 2015, we need to source funds to cover these additional costs.
- B) We build simple, decent homes for the "Working Class" family in need. Selection is based upon need, ability to make monthly payments, and willingness to volunteer time and energy to Habitat's work. We are the ONLY non-profit organization that provides a Home Ownership opportunity for families within 40-60% of the median income.
- C) These two home ownership opportunities are located in Census Block 610.001 (C-2). These homes are available to Low- to Moderate-Income families (C-1) who are current Saratoga Springs residents. The opportunity is available to any qualifying family in Saratoga Springs, by application through Habitat for Humanity of Northern Saratoga, Warren & Washington Counties. Qualifying families are characterized as:
- Current Saratoga Springs resident
 - Low to Moderate Income, Between 40-60% of the median income for the area (approximately 28-42k per our application standards)
 - Currently living in substandard housing
 - Show a demonstrated ability to pay a mortgage through credit history and income
 - But unable to obtain a conventional mortgage
 - Willing to commit to contribute 500 hours of "sweat equity" (community service and on-site volunteer hours) into their own home build project
- D) As a Habitat for Humanity International affiliate, we are required to submit multiple reports on the progress of our Builds. Per our structure, we select one family for our home ownership opportunity and engage the community to volunteer for providing the construction and resources for building the home.
- E) We usually break ground on our Builds in April (as weather permits) and complete the home in late October. Due to the participation of the Workforce Partnership, including the Saratoga Builders Association and Rebuilding Together Saratoga County, we expect 195 Division Street to develop more quickly than our usual timeline.
- F) 195 Division Street is a new construction project with standard permitting process. This

project will be under construction as Habitat for Humanity project, under Habitat for Humanity insurance, which requires a representative from Habitat on site at all times when work is ongoing. Any volunteers and visitors to the site are documented and sign waivers per procedure by Habitat for Humanity.

2. ORGANIZATIONAL CAPACITY

- A) Our affiliate was created by Ralph and Lillian Nicholson (Glens Falls) in 1991. We are an all-volunteer Board covering three counties: Saratoga, Warren and Washington. Our model has successfully created a home for 24 families since inception.

Current Board Members & Officers:

Tammy DiCara, President
Matthew Abrams, Vice President
Carol Norton, Treasurer
Cathy Thompson, Secretary
Keith Bohling, Past President
Maryann Faller (Family Selection Chair)
Jerry Nudi (At large)
Nancy Underwood (At large)
Bill Bufkins (Church Relations Chair)
Harrison Sangster (At large)
Amy Jaffe (Special Events Chair)
Marj Mendez (Family Outreach Chair)
Rilla Schulte (Family Partnership Chair)

- B) Our model has successfully built or rehabilitated one home per year and relocated a family from substandard housing to acceptable living conditions since 1991.
- C) Our financial management is governed by several processes. Our Construction Committee (Matthew Abrams, Chair 2010, Keith Bohling, Al Hall, Tim Lapoint, Jim Realsy) writes the Construction budget (house pricing plan attached), including a part-time paid Project Manager position (Sipe & Sons) to assist the Construction Committee members, who act as Volunteer Project Managers. The construction budget is presented to and approved by the full Board. Our Finance Committee (Carol Norton, Chair, 2008 Keith Bohling, Matthew Abrams) works with the Construction Committee on the budget items, and reviews bills from vendors as they come in. The Audit Committee (Keith Bohling, Chair, 2010, Bill Bufkins, Harrison Sangster) reviews all the operations of the affiliate annually. Quarterly reports are required by Habitat for Humanity International, and are filed by the President (Tammy DiCara, 2010)
- D) The Workforce Partnership as defined by the collaboration between the City of Saratoga Springs, the Saratoga Builders Association, and Rebuilding Together Saratoga, is a strong communion of successful and productive civic groups. The City of Saratoga Springs donated two lots for development and has provided ongoing support of this project. The Saratoga

Builders Association has pledged a minimum of 50% of the skilled labor and materials required to complete this Build. Rebuilding Together Saratoga has committed to assist with Volunteer Management and Organization. This model has the potential for success on a large scale, as demonstrated by other local Habitat affiliates, including Capital District Habitat and Schenectady Habitat.

This partnership is impactful on many levels:

- 1) As the first Habitat for Humanity build in the City of Saratoga Springs it provides a demonstrated structure for the development of underperforming properties in the City
- 2) It contributes to reclaiming the family home in home-based communities with an underperforming property
- 3) It provides an opportunity for a working family to improve their stability by owning a home rather than renting.
- 4) Habitat for Humanity provides a path for families who are an active part of the community, but have limited options for the opportunity that home ownership provides.

3. ACTIVITY BUDGET

A) Attachment 1, Attachment 2, Attachment 2A (House Pricing Policy), Attachment 2B (Exhibit A), Attachment 2C (Beacon Model)

B) We use cash on hand and planned fundraising to fund our Builds. We have reserves of \$70,000 in funds from the Saratoga Showcase of Homes that is restricted for use in Saratoga County. We typically raise \$60,000 toward construction over the course of the Build. The remainder of our funding is from mortgage collections, approximately \$40,000. Reapplying the current mortgage payments into new home construction is an integral part of the Habitat structure.

4. MONITORING OF FEDERAL FINANCIAL ASSISTANCE TO SUBRECIPIENTS

- A) Attachment 3, OMB Circular A-133
- B) Not Applicable

(ATTACHMENT I)

PROGRAM OPERATING BUDGET

(Entitlement Grant + Leveraged Funds = Total Activity Cost)

	ENTITLEMENT GRANT	Leveraged Funds*	Total Activity Cost	*Source of leveraged Funds and In-Kind Services
PERSONNEL				
Salaries		46,128	46,128	ALL SOURCED FROM: DONATIONS, GRANTS, FUNDRAISERS, MORTGAGE PAYMENTS
Fringe (PAYROLL COSTS)		6,738	6,738	
Other (consultants, etc.)				
Subtotal		52,866	52,866	

OVERHEAD				
Advertising/Marketing		3,200	3,200	
Program Supplies		10,280	10,280	
Rent & Utilities		11,400	11,400	
BUILD EXPENSES Other - list below		87,500	87,500	
PROPERTY TAXES, LOSSES & INSURANCE		11,519	11,519	
HABITAT INT'L		11,900	11,900	
PROFESSIONAL FEES & MISC		5,362	5,362	
Subtotal		141,161	141,161	

TOTAL COST		194,027	194,027	
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(ATTACHMENT 2)

CONSTRUCTION / SITE DEVELOPMENT BUDGET

(Entitlement Grant + Leveraged Funds = Total Activity Cost)

	ENTITLEMENT GRANT	Leveraged Funds*	Total Activity Cost	*Source of leveraged Funds and In-Kind Services
PRECONSTRUCTION				
Legal		2,800	2,800	ALL SOURCED FROM:
Engineering		4,100	4,100	DONATIONS, GRANTS,
Architectural/Design				FUNDRAISING,
Fees and Permits				MORTGAGE PAYMENTS
<i>Subtotal</i>	—	6,900	6,900	

DEVELOPMENT				
Relocation				ALL SOURCED FROM:
Site Preparation	30,000	11,500	41,500	DONATIONS, GRANTS,
Construction - materials	30,000	24,900	54,900	FUNDRAISING,
Construction - labor	5,000	13,000	18,000	MORTGAGE PAYMENTS
Construction Financing		9,600	9,600	
Other - (explain)				
<i>Subtotal</i>	65,000	58,500	123,500	

TOTAL COST

65,000	65,400	130,400
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Policy 23- House Pricing

House Pricing Policy for Habitat for Humanity of Northern Saratoga, Warren and Washington Counties

Purpose

Habitat for Humanity of Northern Saratoga, Warren and Washington Counties (the affiliate) will provide affordable homes to qualified partner families in such a way to assure that the homebuyer's initial monthly payment of a purchase of a Habitat Home will not exceed 30 percent of the household's income. The monthly mortgage payment shall include; repayment of principle, real estate and property taxes, homeowner's and hazardous insurance and where applicable, mortgage insurance and loan servicing fees.

House Pricing

Two ratios exist in the housing industry, the "housing expense ratio," which counts principal, taxes and insurance, and the "cost burden ratio," which adds to the previous items the cost of utilities (excluding telephone bill). For the purposes of determining affordability, the Affiliate should use at least the housing expense ratio. However, the affiliate may also use the cost burden ratio, and may also even consider other known recurring expenses, such as mandatory homeowner's association fees, annual termite inspection deposits, etc.

This policy is designed to assure that the homes produced are sold on a no-profit basis. In order to fulfill this no-profit mandate, costs that the affiliate may include into the calculation of the prices of their homes are:

- Cash costs, or donated value of property acquisition and installation of infrastructure (streets, water, utilities, sewer, etc.).
- Legal fees, recording fees, platting costs, engineering costs and architectural costs directly attributable to the home.
- Direct construction costs for labor and materials paid for by the affiliate with cash.
- The value of in-kind material donations.
- The value of donated professional labor by individuals and firms.
- Licenses, permits, insurance and fees directly attributable to the home.
- In addition to the above "direct" or "production" costs, the affiliate is permitted to include up to 10 percent of these total direct costs, to cover indirect expenses incurred by the affiliate in the production of the home such as infrastructure development for a site that is eventually subdivided into several units, general equipment used for construction, supervisors, and other "soft" or "indirect" overhead, administrative and operating costs.

The total repayable price of the home, i.e., the total amount the homeowner will repay to the affiliate over the life of the mortgage, may be less than but must not exceed the total development costs of the home, as defined above. This amount does not include amounts collected pursuant to second mortgages or other equity recapture language

The affiliate is permitted to establish a uniform House cost for a House type if, in the affiliate's judgment, this will make operation more expedient and transparent to applicants and the general public. As an example, the affiliate could therefore decide that all standard three-bedroom Houses would cost the same amount for a given year, which an example is provide below under "*Establishment of the Affiliates Unified 1200 SF House Pricing Policy.*"

Any charges in addition to those listed above would constitute profit for the purposes of defining the terms "no profit, no interest," and as such would not be allowed under this policy. In addition, the affiliate will include as many of the permissible costs that are possible while still keeping the house affordable to the homeowner. Keeping the repayments and the house cost closely tied together reinforces the "hand up, not a handout" philosophy.

Establishment of the Affiliates Uniform House Pricing Policy:

The affiliate's uniform house pricing policy shall allow for an affordable and equitable pricing structure to be established so that in the event, donations of monetary, property, material or services are provided for a build, all families purchasing the uniform house are being charged the pre-established build cost for the build model. In the event that the build cost exceeds the allowable income ratio, the affiliates Board of Directors shall use their judgment to implement the "housing expense ratio" or "cost burden ratio". All houses based on this model, with minor adjustments shall be sold to a partner family with a mortgage value of **\$115,000.00** as outlined in the attached Exhibit 'A', Affiliates Uniform House Pricing Breakdown.

Second Mortgage

There shall be a second, silent mortgage established once the appraisal has been completed. The silent mortgage will be the cost difference between the first mortgage and the appraisal value. The second mortgage shall be forgiven over the course of the repayment of the first mortgage as outlined in the closing documents.

Ex. Appraised Value: \$145,000.00 – First Mortgage: \$115,000.00 = Second Mortgage: \$30,000.00.

Market Conditions

An exception may be allowed for cases of urban blight where, in very depressed real estate markets, the appraised value may actually be less than the costs to the Affiliate. In this case, the Affiliate may in its discretion set the mortgage amount at cost even if it exceeds the appraised value, provided that the house is still affordable according to the standards above.

Placed in effect May 2004- re-copied January 2012, re-copied and modified October 2014



EXHIBIT 'A'
Affiliates Uniform House Pricing Breakdown

Housing Cost Breakdown

Division 1.1	Procurement Cost (Taxes, Survey, Permits, Engineering)	\$4,100
Division 1.2	Land Acquisition Cost (Donated or Purchased)	\$10,000
Division 1.3	Temporary Facilities for Construction	\$1,900
Division 1.4	Construction Management (Consultant or Paid Employee)	\$18,000
Division 1.6	Affiliate Overhead Build Cost	\$9,600
Division 1.7	Closing Cost (Legal Fees, Appraisal, Title)	\$2,800
Division 2.0	Site Work (Land preparation, foundation excavation & backfill)	\$19,800
Division 3.0	Concrete (Foundations)	\$9,800
Division 5.0	Steel	\$860
Division 6.0	Woods, Plastics & Composites (Rough and Final Carp.)	\$8,840
Division 7.0	Thermal & Moisture Protection	\$5,500
Division 8.0	Door and Windows	\$6,700
Division 9.0	Finishes (Gypsum Boar, Painting and Flooring)	\$5,600
Division 12	Furnishings (Closet Shelving)	\$850
Division 13	Equipment (Sump Pump System)	\$1,650
Division 15.1	Plumbing & Gas Piping	\$9,150
Division 15.2	Mechanical (Heating and Ventilation)	\$6,850
Division 16	Electrical	\$7,350
Division 32	Exterior Improvements (Shed)	\$1,050
	Total House Cost	\$130,400
	Expected Donations (12%+/-)	-\$15,400
	Total Build Cost	\$115,000

The above pricing is based on a 1200sf single story house, three bedrooms, one bathroom and a basement, which the standard house plan "Beacon" is based off of. The affiliate can use this uniform house pricing policy for any 1200 sf house that contains the same perimeters that the "Beacon" model does which would yield the same cost assessment.

HABITAT FOR HUMANITY BEACON MODEL

195 DIVISION STREET



Habitat for Humanity
Northern Saratoga, Warren and Washington Counties
4 Glen Falls Technical Park, Suite 4 - Glen Falls, NY 12081 - (518) 793-7414

VISIT and FOLLOW US ON:
www.habitatforhumanity.org
www.glenfalls.habitat.org
EMAIL: info@glenfalls.habitat.org

ARTIST: J. Thompson Architects

A HUGE THANK YOU TO OUR BUILD SPONSORS:

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CURTIS LUMBER **AMER'S SERVICE**
TRAVELERS **Boise Cascade** **Cascades**
HILL **ABC** **BO** **Flintkney**

THE PROCESS:

1. Habitat's ability, site identification and agreement by the local affiliate.
2. A plan is created (plans are provided to the sponsor).
3. The Habitat family volunteering, building an asset (major investment required for the build).
4. A construction process (from plan to reality) and the house is officially opened to the help of volunteers and the local family.
5. The construction process (from planning to building) takes place during the course of several months.
6. After construction is complete, build costs are calculated and the newly finished house built (donated to Habitat or sold through Habitat's Home and Rehabilitation Center at a 10% discount).
7. A donation (usually in the form of cash or another form) is made to Habitat.

Habitat partner families need to:

1. Meet Habitat's minimum standards.
2. Demonstrate commitment and understanding of Habitat's mission.
3. Be a good neighbor to the house.
4. Be a good neighbor to the house.
5. Be a good neighbor to the house.

To make these partnerships profitable, we rely on donations, donations, and opportunities to participate in the local economy. Habitat for Humanity Saratoga, Warren and Washington Counties does not receive any financial support from Habitat for Humanity International. All funds for the house are built by local family. All donations for the house are an investment in your community. Habitat for Humanity, we are the builders and the backbone for "Partner Families" making their dreams of homeownership a reality.



OFFICE OF MANAGEMENT AND BUDGET (OMB) CIRCULAR A-133
MONITORING OF FEDERAL FINANCIAL ASSISTANCE TO SUBRECIPIENTS

Glens Falls Area Habitat For Humanity Inc

ORGANIZATION: *HABITAT FOR HUMANITY of Northern SARATOGA, WARREN, WASHINGTON* *County*

MAILING ADDRESS: *4 GLENS FALLS TECH PARK, Suite 4, Glens Falls NY 12801*

FEDERAL ID #: *22-3476475* PHONE: *518-793-7484* FAX: *None*

DUNS #: _____

1. Please identify your fiscal year (mth/yr to mth/yr): *July 1, 2014 - June 30, 2015*

Please identify below the funding received during your last fiscal year:

2. Community Development Block Grant Entitlement Funding (CDBG):

CDBG Activity Name: *None*

CDBG Funding Program Year: _____ CDBG Funding Amount: _____

3. Other Federal Financial Awards (cash & non-cash):

GIVE NAME & CATALOG OF FEDERAL FINANCIAL ASSISTANCE (CFDA) #	AMOUNT OF AWARDS
<i>None</i>	

4. During your last fiscal year, has your organization expended more than \$500,000 in total federal financial awards (incl. CDBG & all other federal assistance)? YES * _____ NO *NO Federal Assistance*

* If "yes", include a copy of your latest Single Audit Report with this completed and signed form as part of your application. If you answered "no", please complete, sign and return this form.

5. Are you aware of any financial audit violations, findings or questioned costs relating to any activity funded with federal financial assistance? YES * _____ NO

* If "yes", please describe: _____

6. Other Saratoga County Awards (cash & non-cash):

IDENTIFY PROGRAM NAME & YEAR OF AWARD	IDENTIFY AMOUNT OF Co. AWARDS
<i>None</i>	

Carol P. Norton, Treasurer
Authorized Signature

1/26/15
Date



January, 30 2015

Dear Tammy Dicara,

On behalf of the 160 members of the Saratoga Builders Association and our thirteen-member Board of Directors, we are excited to be working together on this Workforce Community Partnership in the City of Saratoga Springs. We are committed to collaborating and assisting Habitat for Humanity of Northern Saratoga, Warren and Washington Counties in successfully transforming the vacant lot at 195 Division Street into a first-time workforce family homeowner opportunity.

The vision and role of the Saratoga Builders Association in this project is to reach out to our membership for both pro-bono and significantly discounted resource assistance including labor and materials to complete this endeavor. We believe that this is an exceptional and worthy effort which fits with our organization's core mission and goals.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barry Potoker", is written over a circular stamp or seal.

Barry Potoker

Executive Director, Saratoga Builders Association



2015 BOARD OF DIRECTORS

PRESIDENT
David Blair

January 28, 2015

VICE PRESIDENT
Ed Larkin

Dear Tammy Dicara,

TREASURER
Paul von Schenk

It has been a pleasure to work with Habitat for Humanity Northern Saratoga, Warren and Washington Counties, the City of Saratoga Springs and the Saratoga Builders Association as partners on the Workforce Housing Committee.

SECRETARY
Michael Tuck

The role of Rebuilding Together Saratoga County will be to assist in recruiting volunteers along with site management for the planned project at 195 Division St., Saratoga Springs.

Karen Carling
Tammy Crawford
JR George
EJ Harkins
Jacqui Harris
Jason Lee
Barbara Mitchell
Ellen Skeele
Deb VanDeMar

The most exciting aspect of the project, besides building a new home for homeowner is the collaborative efforts of the group. We look forward to a successful project.

EXECUTIVE DIRECTOR
Michelle Larkin

Sincerely,

A handwritten signature in cursive script that reads "Michelle Larkin".

Michelle Larkin
Executive Director
Rebuilding Together Saratoga County

PROJECT MANAGER
Jeff McLellan

COUNSEL
Matthew Coseo

EXECUTIVE ASSISTANT
Marian Bigelow

BOOKKEEPER
Lois Kellas

ADMINISTRATIVE ASSISTANT
Kathy Stanko

PR AND GRANT ADVISOR
Michaela Brown

This is an Equal Opportunity Program. Discrimination is prohibited by Federal Law.

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