



Website: [reiawaynecounty.org](http://reiawaynecounty.org)  
Wayne County REIA



Wayde Koehler, President  
(313) 819-0919



P.O. Box 5341  
Dearborn, MI 48128

November

2025

## ***Attorney Kathleen Parakh***

### ***Topic: Vetting Tenants***

Local landlords and property managers are invited to attend an essential meeting focused on the cornerstone of successful rental operations: proper tenant screening and legal lease agreements. Attorney Kathleen Parakh will lead a comprehensive presentation on best practices for vetting prospective tenants and establishing legally sound rental agreements. The program addresses critical aspects of the screening process from initial contact through lease signing.

Kathleen Parakh is licensed to practice before the United States Patent office, State of Michigan and the 6th Circuit Federal Court. She has a Juris Doctor from Thomas M. Cooley Law and has over 15 years' experience. In addition, Kathleen has worked as a property manager herself for over six years. She specializes in representing landlords & tenants, including lease drafting and tenant removal processes.

**Network with successful investors at 5:30 pm, meeting from 6:00-8:00pm at Leon's Family Dining, 23830 Michigan Ave., Dearborn. Free for REIA members - Guests welcome for just \$20**

Leon's Family Dining  
23830 Michigan Ave., Dearborn  
(313) 563-3713  
(East of Telegraph on Michigan Ave.)

***Parakh Law***

***Phone: 734-707-0707***

***Website: [www.parakhlaw.com](http://www.parakhlaw.com)***



# REIA Membership Benefits

## Why Join? The Benefits Speak for Themselves!

Connect with investors, landlords, and contractors while accessing expert-led presentations, monthly newsletter, and guest speakers with the latest industry insights. Members receive a free 3-month Mr. Landlord Newsletter subscription, court-approved property management forms, and exclusive discounts at Sherwin-Williams, Office Max, and major retailers. Build your investment team through trusted referrals for rehabs and property management, plus stay informed through advocacy connections with local and state officials. Contractors enjoy steady streams of long-term business opportunities from our active member network.

Annual membership is **\$135 for individual and spouse** (fully tax-deductible). Your fee supports speakers, website maintenance, insurance, newsletters, events, and a Lansing lobbyist advocating for landlord and investor interests. Our volunteer board takes no compensation, ensuring every dollar strengthens our community.



## R.E.I.A. of Wayne County Board Meeting

The Board of Directors meeting is set for November 11th at 6:00 PM, Location TBD

### Volunteer Board Members Contact Information

Wayde Koehler.....313.819.0919.....housemgt@comcast.net  
Maria King.....248.259.3268.....kingm625@yahoo.com  
Mike Sloan.....313.618.5277.....sloanmaintenance.llc@gmail.com  
Jeremy Paul.....734.770.1455.....pauljer9my@gmail.com  
Jerry Kirschner.....248.867.0744.....gkirsch888@aol.com  
Liz Walker.....313.443.8505.....beneficialinvestments@gmail.com  
Dave Moody.....734.362.3328.....dave@rrepros.com



# Annual *Holiday* Party

Join us for an evening of delicious dinner and great conversation with fellow REIA members and friends! Come celebrate and connect with your real estate investment community in a relaxed, festive atmosphere. The party will be held on December 2nd, 2025, from 6:00 PM to 9:00 PM at The Broadcast Booth, located at 6550 Allen Rd, Allen Park, MI 48101. Tickets are \$30 per person. Don't miss this opportunity to unwind, network, and enjoy good food and company as we wrap up another successful year together!

## Event Details:

- Date: December 2nd, 2025
- Time: 6:00 PM - 9:00 PM
- Location: The Broadcast Booth:
  - 6550 Allen Rd, Allen Park, Michigan
- Price: \$30 per person

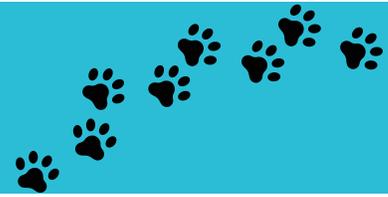


## Several Ways to Register:

- Scan the QR code
- Click on the Link: <https://square.link/u/7tvlwWUK>
- Pay Cash at our October or November meeting



# LANDLORD SCORES MAJOR RULING IN EMOTIONAL SUPPORT ANIMAL FEE WAIVER CASE



Elizabeth A. Rousset

Luke G. LaHaye

Published: Aug 20, 2025

Adams & Reese recently obtained a landmark win for a housing provider, securing a ruling that it did not have to automatically waive its animal fee for a tenant with an emotional support animal (ESA) under the Fair Housing Act (FHA).

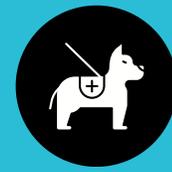
In Henderson v. Five Properties LLC, U.S. Eastern District of Louisiana Judge Sarah Vance held that a tenant with an ESA seeking to have her landlord waive a generally applicable animal fee was required to prove that the waiver was both necessary for her to use and enjoy her home and reasonable. In reaching her ruling, Judge Vance rejected the notion that guidance issued by the U.S. Department of Housing and Urban Development (HUD) always requires housing providers to waive pet fees for people with ESAs. Historically, the Chevron doctrine required courts to defer to agencies' statutory interpretations if they were reasonable. That changed when the United States Supreme Court eliminated Chevron deference in Loper Bright Enterprises v. Raimondo. Recognizing this change in the law, Judge Vance noted that it is the role of the courts, not agencies, to interpret constitutional and statutory provisions; that agency interpretations are not law; and that agency interpretations are only entitled to respect if they have the power to persuade. Ultimately, she found the HUD Notice stating that a housing provider may not charge a fee or deposit for a service animal or other assistance animal "unpersuasive." Judge Vance's opinion is the first decision in the country to squarely address this issue of importance to housing providers who are subject to the FHA.

## Breaking Down the Legal Dispute

This case involved the plaintiff's request for a reasonable accommodation under the FHA and Louisiana Equal Housing Opportunity Act (LEHOA), specifically seeking a waiver of a \$400 animal fee for her dog, which she claimed was an ESA. The defendants' apartment complex allows animals, so there was no issue with the dog living there. The only dispute was whether the defendants had to waive the animal fee they charged all tenants for the plaintiff just because she had an ESA. Adams & Reese attorneys argued that the FHA does not say housing providers must waive animal fees for ESAs. It only says they must make reasonable accommodations that are necessary for disabled people to use and enjoy their homes equally. The plaintiff, represented by the Louisiana Fair Housing Action Center, argued that it is always necessary to waive animal fees for people with ESAs to afford them an equal housing opportunity.

HUD and the Department of Justice (DOJ) issued a 2004 Joint Statement and HUD issued a 2020 Notice, both of which suggested, and have been interpreted to mean, that housing providers never can charge pet fees for people with ESAs. But Judge Vance found these authorities unpersuasive under Skidmore v. Swift & Co. because the cases cited within the Notice did not support HUD's position and because the Joint Statement was not thorough and had no reasoning to evaluate. Judge Vance rejected the argument that landlords always must waive fees for tenants with ESAs. Instead, she concluded that whether such accommodation is required is a fact-specific, case-by-case determination. Judge Vance recognized that a fee waiver is only necessary if it is indispensable and essential to achieve ameliorative effects of the tenant's disability. Whether a fee waiver is reasonable depends on factors such as "the amount of fees imposed, the relationship between the amount of fees and the overall housing cost, the proportion of other tenants paying such fees, the importance of the fees to the landlord's overall revenues, and the importance of the fee waiver to the handicapped tenant."

# LANDLORD SCORES MAJOR RULING IN EMOTIONAL SUPPORT ANIMAL FEE WAIVER CASE



## Continued...

Ultimately, Judge Vance found the plaintiff failed to prove she needed a fee waiver because she did not put forward any evidence to demonstrate that waiving the fee would alleviate the effects of her disability and the record showed the plaintiff could afford the fee, particularly if given the option to pay in installments. Judge Vance also found the plaintiff failed to demonstrate a genuine issue of material fact as to the reasonableness of her request considering the fee was a little under 3% of the total cost of the housing, animal fees are relatively typical for leased apartment buildings in which animals are allowed, and the plaintiff failed to come forward with evidence about the importance of the animal fee to the defendants' overall revenue.

## Why This Decision Matters for Landlords

For years, HUD, the DOJ, and others have maintained that housing providers must waive fees whenever someone claims they are disabled and need a service or assistance animal. Period.

Though not actually the law, this idea was perpetuated through Internet websites that have profited by promoting the sale of ESA prescriptions by advertising that purchasers may save money by avoiding animal fees. Judge Vance's ruling clarifies that the analysis does not begin and end with the delivery of an ESA letter from a tenant to a landlord.

Instead, tenants seeking fee waivers must prove they need them and that their request is reasonable under the circumstances. Judge Vance's ruling provides guidance to landlords about how to assess both the need for and the reasonableness of fee waiver requests. It also confirms that alternative accommodations, such as allowing tenants to pay over time, can be effective.

## About Our Authors

Liz Roussel is a Litigation Practice Group Leader at Adams & Reese and a longtime Partner in the national law firm's New Orleans office. Liz is ranked Band 3 in Labor & Employment Law in Louisiana by Chambers USA and she has been recognized by Best Lawyers® on multiple occasions. Liz focuses her practice on advising employers and managers of businesses and defending their interests in litigation. Liz has represented a wide variety of clients including energy and oil and gas companies, real estate owners, healthcare organizations, financial institutions, Fortune 500 companies, retailers, public entities, nonprofits, state agencies, private universities, charter schools, start-ups and technology companies, among others.

Luke LaHaye is a member of the Adams & Reese Litigation Practice Group and an attorney in the national law firm's DC office. Luke has a diverse practice that focuses on litigation as well as regulatory and compliance counseling. In his litigation practice, he represents clients in a variety of areas, predominately commercial litigation and labor and employment. His regulatory and compliance practice spans from advising clients on customs and international trade issues to counseling financial institutions and service providers regarding compliance with federal and state consumer protection statutes and regulations.

## **What Is a Housing Application Questionnaire?**

A housing application questionnaire is a standardized form used by property managers and landlords to collect essential information from prospective tenants. This document serves as the first formal step in the rental application process, helping property owners make informed decisions about who will occupy their rental units.

### **Primary Uses and Purposes**

#### **1. Initial Tenant Screening**

The questionnaire acts as a preliminary screening tool that allows landlords to quickly assess whether an applicant meets basic qualification criteria before investing time and resources into a full background check. By collecting key information upfront, property managers can efficiently filter out applicants who don't meet minimum requirements.

#### **2. Financial Qualification Assessment**

One of the most critical functions is verifying that prospective tenants have sufficient income to afford the rent. The standard industry practice, reflected in most questionnaires, requires tenants to earn at least three times the monthly rent. This ratio helps ensure tenants can comfortably afford rent while meeting other financial obligations, reducing the risk of late payments or defaults.

#### **3. Rental History Evaluation**

The questionnaire gathers information about an applicant's current living situation, including how long they've lived there, their current rent amount, and their reason for moving. This data helps landlords identify red flags such as frequent moves, evasiveness about reasons for relocating, or patterns that might indicate problematic tenant behavior.

### **Common Qualification Standards**

Most housing questionnaires include or reference standard qualification criteria:

- **Income-to-Rent Ratio:** Typically 3:1 (income must be three times monthly rent)
- **Rental Payment History:** No recent evictions, judgments, or patterns of late payment
- **Utility Payment History:** Current on all utility obligations
- **Criminal Background:** May be considered depending on state and local laws
- **Credit History:** Evaluated but often secondary to demonstrated payment history

\*See example questionnaire on page 7

### Benefits for Landlords

- Risk Mitigation: Early identification of applicants who don't meet basic criteria saves time and money on unnecessary credit checks and background screenings.
- Standardization: Using a consistent questionnaire ensures all applicants are evaluated using the same criteria, promoting fair housing practices and reducing discrimination risks.
- Efficiency: A well-designed questionnaire streamlines the application process, allowing property managers to process multiple applications quickly during high-demand periods.
- Documentation: The completed questionnaire becomes part of the tenant file, providing a paper trail that may be valuable if disputes arise later.

### Benefits for Tenants

- Transparency: A clear questionnaire helps tenants understand exactly what landlords are looking for, allowing them to self-assess their qualification likelihood before investing time in the full application process.
- Preparation: Knowing what documentation will be required allows applicants to gather necessary materials in advance, speeding up the approval process.
- Fair Treatment: Standardized questionnaires ensure all applicants are asked the same questions, promoting equitable treatment regardless of protected characteristics.

Yes, the home is available. Please fill out ALL of the questionnaire!

HOUSE MANAGEMENT QUESTIONNAIRE, 313-819-0919, e mail [housemgmt@comcast.net](mailto:housemgmt@comcast.net)

Please fill out and e mail to [housemgmt@comcast.net](mailto:housemgmt@comcast.net).

1. Name \_\_\_\_\_ cell # \_\_\_\_\_ e mail \_\_\_\_\_
2. Total Income monthly of all people moving in, income you can verify, not under the table, not unemployment. If self-employed you must be able to show proof, such as tax returns.  
Total monthly income \_\_\_\_\_
3. Number of people moving in? \_\_\_\_\_
4. Current rent? \$ \_\_\_\_\_
5. How long have you lived there? \_\_\_\_\_
6. Type of pets, \_\_\_\_\_
7. Why are you moving? \_\_\_\_\_
8. What is your soonest move in date? \_\_\_\_\_
9. Section 8? If yes what is your voucher amount if you pay all utilities? \$ \_\_\_\_\_
10. Have you given your 30-day notice? \_\_\_\_\_. What date was it given? \_\_\_\_\_

To qualify, the short version.

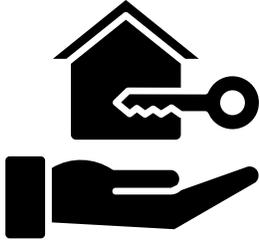
Your income must be 3 times the monthly rent.

You must have paid your rent on time. You have not received, demands, court orders, judgment's, evicted etc.

Be current on all utilities. Credit score isn't as important as paying credit cards and other bills on time.

If you are on section 8 or assistance, you will pay all utilities and your maximum allowed rent must be at least what the home is renting for.

**Printable questionnaire  
located on pg. 8**



Yes, the home is available.  
Please fill out ALL of the questionnaire.

## HOUSE MANAGEMENT QUESTIONNAIRE

Landlord Phone: \_\_\_\_\_

Landlord Email: \_\_\_\_\_

Directions: Please email completed questionnaire to the address listed above.

Name \_\_\_\_\_ Cell # \_\_\_\_\_ Email \_\_\_\_\_

Total Income monthly of all people moving in, income you can verify, not under the table, not unemployment. If self-employed you must be able to show proof, such as tax returns.

Total monthly income: \$ \_\_\_\_\_

Number of people moving in? \_\_\_\_\_

Current rent? \$ \_\_\_\_\_

How long have you lived there? \_\_\_\_\_

Type of pets \_\_\_\_\_

Why are you moving? \_\_\_\_\_

What is your soonest move in date? \_\_\_\_\_

Section 8? If yes what is your voucher amount if you pay all utilities? \$ \_\_\_\_\_

Have you given your 30-day notice? \_\_\_\_\_ What date was it given? \_\_\_\_\_

### TO QUALIFY (THE SHORT VERSION)

- Your income must be 3 times the monthly rent.
- You must have paid your rent on time with no history of demands, court orders, judgments, evictions, etc.
- You must be current on all utilities.
- Credit score isn't as important as paying credit cards and other bills on time.
- If you are on section 8 or assistance, you will pay all utilities and your maximum allowed rent must be at least what the home is renting for.

# Contractors

Note: REIA of Wayne does not support or make any recommendations regarding contractors. It is up to you to do your due diligence when hiring any contractor. This is for information purposes only.

## Appliance Repair

Keith Devoy Appliance Repair.....313 689-2446

## Concrete

Nelson Concrete..... 313 212-3927

Asphalt repair, seal, top..... 248 818-5149

## Construction/Remodeling

Ideal Home Improvement.....734 624-3454

Ishtar Construction.....313 720-3556

## Electrician

King Billy's LLC.....313 333-6467

Haddix Electric Co.....313 386-7299

## Handyman

American Skilled Svc.....313 264-9579

Handyman Service Plus.....313 242-7372

## Pest Control Service

Stop Pest Control.....313 914-2981

## Plumbing

Waterwork Plumbing.....248 542-8022

Bennies Plumbing.....313 388-5561

Shaw's Plumbing.....313 285-4361

## Roofing

Jeff Williams Roofing.....734 341-3843

Kanga-Roof.....566 255-0308

## Heating and Cooling

Main Heating and Cooling.....248 650-8511

Mega Rooter H & C.....313 254-3529

Expert Heating and Cooling...734 672-1818

## Lawn Service

J & A Lawn Svc (Jason).....727 906-7958

Classic Cuts (Liz).....313 989-8713

## Locksmith

American Lock & Key.....734 281-1454

## Painting

Diamond Painting.....248 935-4514

Dante's Painting (Edmond).....586 610-1812

Sergio Guerrero.....313 282-9119

Ishtar Construction & Painting...313 720-3556

## Tub Reglaze

Surface Solutions.....734 455-0200

TNT Refinishing.....810 358-0744

Michigan Tub Refinishing.....313 304-9639

## Tree Trimming/Removal

Juan's Tree Service.....301 804-7504

Paul Harris-Tree Trimming.....734 775-6974



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E: [203k@myrehabconsultant.com](mailto:203k@myrehabconsultant.com)  
P: 877-399-203K

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**Joshua K. Sterling**  
**(734) 225-6934**  
**[www.EpicPropertyManagement.com](http://www.EpicPropertyManagement.com)**

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Southgate, MI 48195  
[josh@epicpropertymanagement.com](mailto:josh@epicpropertymanagement.com)

## Jacob Aaron Kahn

**Attorney & Counselor at Law**

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**KATHLEEN M. PARAKH**

- PRINCIPAL ATTORNEY -

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**WARRANTIES ON ALL APPLIANCES**