

I. Specify How you supervise your agents:

- How many Agents do you have? **896**

**Our membership reflects the general rule of licensees and Board Members. About 200 of our Agents are very active, about 300 never practice, and the remainder only practice very occasionally.**

- How many offices do you have?

**We currently have 7 offices. Most of the 7 locations are convenient meeting spaces set up to host Client/Customer Meetings. The majority of our Agents work remotely. However, all training, submission of paper work, associations, finance & commission disbursements and other services are provided at our Plainview Corporate Headquarters.**

**The Plainview office maintains the licenses for 834 associated Agents. The Bayside office maintains the licenses for 12 associated Agents. The Bronx office maintains the licenses for 32 associated Agents. The Commack office maintains the licenses for 2 associated Agents. The W Sayville office maintains the licenses for 9 associated Agents. The Long Beach office maintains the licenses for 3 associated Agents. The White Plains office maintains the licenses for 4 associated Agents.**

- If more than one Office do you work out of one office in particular?

**I primarily work out of the Plainview office.**

- How often do you visit/go to the other offices?

**I get out to Long Beach and the Bronx offices monthly. We (the Office Manager, Ruth Pfeffer, or I) visit the Branch offices. Since Agents do not sit at their desks at those meeting, spaces, there is rarely a need to visit unless there is an on-site meeting, training session or we are checking on the condition of the office space.**

- Is there a Chain of Command/Hierarchy wherein other Brokers of Record or Associate Brokers (i.e., Branch Office Managers) supervise staff in other Offices?

**Other than in Plainview, we have no employee in the off-site offices. These offices are merely for agent/client meetings and for marketing purposes. There is absolutely no walk-in traffic at all, as these spaces are not storefront locations. All Agents are supervised from the Corporate office by the Broker, Manager, Office Branch Managers and several licensed staff members allocated to various areas of expertise.**

- Are there regular meetings held? How does that work?

**Yes, Every Agent must attend our New Agent Orientation, a "Power Platform" class to learn how to prepare proper paperwork and submit it to us, and a Rental/Fair Housing program. We do monthly Compliance Training which includes Agency Disclosure, Lead Paint Disclosure and other information to keep up to date. Beyond that we host a minimum of one training meeting a week (usually more). We also have a group email where we disseminate all company information. Additionally, we have a company message board where questions are answered day and night, week days and weekends.**

**The Broker and/or Office Manager prepare videos, e-mails and coordinate mass phone calls to every Agent if information has to reach our Agents in a timely manner. We employ a website where our Agents have access to a portal containing training materials, articles, memos and video-taped training programs for instant delivery.**

**See, also, Ruth Pfeffer Statement.**

- Are you accessible to all Agents? If so, how.

**My Office Manager and/or I are available at all times, (24/7), to our Agents. We provide supervision and guidance via email, mobile phone or in person, as necessary. During Business Hours we have an AGENT HOTLINE where a licensed staff member and/or the Office Manager answers Real Estate questions.**

**See, also, Ruth Pfeffer Statement.**

## II. Follow-up Interview Questions

1. What office does Edwin F. Torres work out of?

**Edwin works out of Plainview office.**

2. Do you work out of the same office?

**Yes.**

3. Do you have regular and direct dealings with Edwin F. Torres? How often?

**Edwin has been with us for at least a decade. I know him and so does my staff. He attends training regularly, calls to ask questions and comes in with closing checks.**

4. Describe the established rules or policies that help to guide your agents.

**We are all about training, education, rules, policies and compliance with all applicable Federal, State and Local Fair Housing laws. Our Agents are told from day one that they are free to brand themselves for their business but they must adhere strictly to Federal, State and Local Fair Housing laws. Additionally, they must be compliant with the DOS, NAR, NYSAR and the Local Boards. All written information for marketing and advertising must be submitted the Broker or Office Manager for approval.**

**See, also, Ruth Pfeffer Statement.**

5. Are there any Fair Housing signs posted in your office?

**Fair Housing signs are in our lobby and in our Agent Room, as well as the conference room. There signs are in our Branch Offices, as well. We recommend that our Agents display them at their Open Houses in plexi-frames, as well.**

6. Are Fair Housing concepts mentioned in Charles Rutenberg Realty Inc advertisements? If so, disclose the fashion in which the concepts are referenced.

**Charles Rutenberg Realty, as a corporation, does not advertise to the public directly. We do advertise to recruit Agents. We ensure that we are very inclusive in every advertising piece. Our company roster includes Agents from**

every corner of the earth, speaking over 50 languages. Our oldest Agent turned 90 in March and we have several 18-year-old Agents. Our Agents generally pay for their own advertising. Everything from business cards to website content or mailings must be reviewed and approved by the office. We always monitor for compliance.

See, also, Ruth Pfeffer Statement.

7. Discuss the way Fair Housing training and education is provided to Charles Rutenberg Inc. agents. Submit training materials (if applicable).

Fair Housing training is administered to our Agents via qualified instructors off premise. Since this is a DOS CE requirement, we cannot do the courses in house. We spend a portion of our New Agent Orientation on Fair Housing requirements. Handouts concerning appliance with Fair Housing laws and addressing Fair Housing issues are provided. We always reinforce Fair Housing at our in-house classes, whether they be for Rentals, Listing Appointments, Compliance training or any other topic.

See, also, Ruth Pfeffer Statement.

We are in the process of gathering training materials and will provide you with them when we meet again on February 7, 2020 concerning the two other agents (Giordano and Johnson).

8. Has any Fair Housing misconduct by any agent been identified and reported?

We received a report in July of 2011 that an Agent of ours had been identified by the Commission on Human Rights as having denied a tenant based on source of income, despite training in our office regarding the law. The Agent was terminated by us in September of 2011. In March of 2014 we signed a Conciliation Agreement, paid a fine of \$3000 and attended Fair Housing Training.

See, also, Ruth Pfeffer Statement.

9. Are you familiar with the housing allegations mentioned in a recent Newsday article? If so, what action(s) did you take?

I received a letter from Newsday about the allegations, well before the article was printed. I was extremely troubled by the accusations as all Agents were longstanding Rutenberg associates. I choose to visit Newsday to view the videos myself as I believe it was my supervising responsibility to do so. I did not see on the videos any violation of any of the Fair Housing laws, or any different treatment on account of race or ethnicity. Nevertheless I called each of the Agents in for an interview, to discuss the videos and address best practices. It was my opinion that beyond that, no disciplinary action was required. However, Rutenberg has implemented additional training so as to further prevent, to the extent possible, any possible Fair Housing violations.

10. Has Edwin F. Torres been actively showing listings since the publication of the Newsday article? If so, please provide listing information.

Yes. See attached.

11. Are your agents required to attend Fair Housing training seminars?

All Agents are required to take 3 hours of Fair Housing training every 2 years in order to renew their licenses. We directly advise each Agent about these requirements prior to their license renewal.

See, also, Ruth Pfeffer Statement.

12. How do you assure that your agents are compliant with Fair Housing Laws and responsibilities?

We take this responsibility seriously. We monitor all advertising from our Agents, and review listing and selling paperwork. We discuss best practices regularly on our web-chat, agent emails and in training. Updates to local and state laws are distributed and posted. We ensure that our Agents are reminded of their obligations to take CE Fair Housing training every license period. We offer Fair Housing training on our website through an on-line CE provider. Moreover, when issues come up concerning compliances with Fair Housing laws, we not only seek guidance from LIBOR's and NYSAR's legal counsel, but we have outside counsel knowledgeable about to advise us. Additionally, prior to associating with an Agent, we discuss Fair Housing issues with the Agent and require them to sign a Fair Housing issues commitment that they are aware of and will comply with these laws.

See, also, Ruth Pfeffer Statement.

13. Do you attend Fair Housing seminars?

While I am not required to attend Continuing Education as a Licensee who has been grandfathered out of CE, I have attended Fair Housing Training various times over the last few years. Additionally, the topic is covered in office training which I participate in monthly.

14. What measures do you take to ensure that your agents are acting in accordance with the Fair Housing Laws?

See, Response to #12. Moreover, most importantly, our company culture is one of diversity and inclusion. We don't just talk about equal opportunity - we provide equal opportunity to all. As indicated, repetition in training is essential. If we see any indication that an Agent is not following the law or doesn't understand the law, we immediately step in. Sometimes an unintentional mistake is made in that is the case, we provide guidance and training. If there is any indication that an Agent does not or will not follow the law, (any law), we terminate their association with us.

See, also, Ruth Pfeffer Statement.



Joe Moshe