

Response from Full Circle Communities to Neighbor Questions (Submitted to Full Circle via Village Staff on 5/8/24)

TOP Critical Questions for Full Circle listed below. We would ask all answers be **full and complete** and focus on data / information in both a summarized view and links to disaggregated (source data) as support.

- 1) **Question/Request from Neighbors: Please provide a full and complete list of ALL police and emergency responses for 2021 – YTD 2024, the information should included:**
 - a) **Data for the following properties:**
 - i) **Village Brook**
 - ii) **Creekview**
 - iii) **5150 NW Highway**
 - iv) **Pearl Street**
 - v) **1212 Larkin**
 - b) **The following information:**
 - i) **Date**
 - ii) **Type of response (domestic violence, drug distribution, auto theft)**
 - iii) **Resolution in the case of serious (non-wellness / lockout) responses (e.g., if there was a call for domestic violence, how was that serious incident resolved and what became of the tenant)**
 - c) **The information should be summarized in an easily accessible view for both the Board as well as the Arlington Heights community, with detailed support available through a separate link**

Full Circle Response: Full Circle has previously provided information on this matter (please reference our more extensive question and answer documents available on the Village website at the link below¹), but to answer here as well, the Arlington Heights Police Department did their due diligence by calling Police Departments of jurisdictions with comparable permanent supportive housing (PSH) properties to determine the number of calls for service (CFS) over the last three years and shared that information at the 12/4/23 Village Board meeting.² The Village provided the number of calls for service for Pearl Street Commons (Full Circle property), Heart's Place (not owned or managed by Full Circle), Fifteenth Street Apartments (Full Circle property), Myer's Place (not owned or managed by Full Circle), 1212 Larkin (Full Circle property), and Philhaven (not owned or managed by Full Circle). The Village likely chose these properties because they are most comparable to the proposed Grace Terrace. Many of the properties average around two calls per

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https://www.vah.com/government/departments/planning_community_development/developments_projects_full_circle_communities.php

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<https://cms2.revize.com/revize/arlington/Departments/Planning%20%20Community%20Development/Developments%20%20Projects/FCC%20Full%20Circle%20Communities/Staff%20VB%20Presentation%20-%20Grace%20Terrace%20Final.pdf>

unit per year, with the exception of Philhaven, which averages more than three calls per unit per year (please note that Philhaven is not owned or operated by Full Circle).

In the Village Staff Report for the 11/8/23 Plan Commission meeting, the staff had coordinated with the Arlington Heights Police Department to inquire about the impact of an existing PSH project located in the Village (Heart's Place) and noted, "With the exception to a singular call for police service involving a firearm, over the last five years Heart's Place has not generated any additional demand on law enforcement services when compared to standard multi-family residential developments."³ Our understanding of the incident involving a firearm at Heart's Place is that a guest of a resident shot off a gun into the air (no one was injured) and the resident has since vacated the property, but again, Full Circle does not own or operate this property. As part of Full Circle's lease requirements and house rules, no firearms will be allowed on the property by residents or their guests.

5150 NW Highway and Villagebrook are not comparable to Grace Terrace. 5150 NW Highway is a 75-unit mixed-income apartment community located in Chicago, IL. Villagebrook is a multi-building complex with 189 1-, 2- and 3-bedroom apartments located in an industrial area of Carol Stream, IL. Both buildings are significantly larger than Grace Terrace and have different target populations.

In terms of specific details on the dates, types of responses, and resolution for every police call over the past three years for the five properties listed, this information is atypical to provide as part of a zoning process and it is our understanding that market-rate developers are not expected to provide this volume of information for zoning purposes. Our proposal should not be held to a different standard because it is affordable housing that is targeting vulnerable populations as this would be discriminatory.

- 2) Question/Request from Neighbors: Please provide a full and complete list of ALL evictions for 2021 – YTD 2024, the information should included:**
- a) Data for the following properties:**
 - i) Village Brook**
 - ii) Creekview**
 - iii) 5150 NW Highway**
 - iv) Pearl Street**
 - v) 1212 Larkin**
 - b) Information for each eviction:**
 - i) Date of incidence**
 - ii) Type of incidence, including any past incidence for the evicted tenant**
 - iii) Date eviction process was implemented**
 - iv) Data eviction concluded**
 - c) The information should be summarized in an easily accessible view for both the Board as well as the Arlington Heights community, with detailed support available through a separate link**

Full Circle Response: We will not provide eviction information on our tenants for privacy purposes (nor do we collect this data at an aggregated level). Furthermore, the request for the specifics about each eviction over the last three years at the five listed properties and the volume of information that would go along with that request is atypical to provide during a zoning process and it is our understanding that market-rate developers are not expected to provide this volume of information for zoning purposes. Our proposal should not be held to a different standard because it is affordable housing that is targeting vulnerable populations as this would be discriminatory.

- 3) Question/Request from Neighbors: Provide a detailed explanation for how the following convicted felons with serious and extensive criminal backgrounds were allowed to take and maintain residency in Full Circle properties; please include the following information:**
- a) Full Circle Tenants:**
 - i) [Name Redacted] – [Address Redacted]**
 - ii) [Name Redacted] – [Address Redacted]**
 - iii) [Name Redacted] – [Address Redacted]**
 - iv) [Name Redacted] – [Address Redacted]**
 - b) Information to Provide**
 - i) Full past convictions from all counties available through FOIA requests**
 - ii) Date each convict took residency with Full Circle**
 - iii) Date they were evicted or if they have maintained residency**
 - iv) Results of vetting process each went through to take residency**
 - c) The information should be summarized in an easily accessible view for both the Board as well as the Arlington Heights community, with detailed support available through a separate link**

Full Circle Response: Full Circle has previously addressed questions about its strict approach to screening tenants for criminal backgrounds which, like for all landlords, requires compliance with the Cook County Just Housing Amendment to the Human Rights Ordinance. To try to fully address community questions, Full Circle is also responding here.

Full Circle utilizes a rigorous criminal background check process and as required by law, fully complies with the Cook County Just Housing Amendment to the Human Rights Ordinance.⁴ The Just Housing Amendment places strict limitations on Cook County landlords regarding the criminal history that can be considered for tenants. Landlords can screen tenant candidates for criminal history that is less than three years old. Our criminal screening process is through a third-party and is based on data across all states for 47 different offense criteria. Qualifying for tenancy based on previous offenses is determined on an individual basis. Full Circle does reject applicants on the basis of property damage, drug offenses, sexual offenses and violent criminal offenses, as permitted by law. We abide by all federal, state and county laws and ordinances, including the Fair Housing Act, the Illinois Human Rights Act, and the Just Housing Amendment.

⁴ https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/documents/2024-01/jha_faq_for_landlords_updated_1.29.24%20%281%29.pdf

As to the specific tenants in question:

- We have redacted the names and addresses in this question for the privacy of the individuals listed (note that FOIA'd information typically redacts individuals' addresses).
- Full Circle has no record of one of the individuals listed as being a tenant at any of our properties.
- For the remaining three tenants listed, at the time of screening (vetting), the applicants' background checks, no disqualifying information was found.
- To protect tenant privacy and be consistent with the Cook County Human Rights Ordinance, the Just Housing Amendment, and the Civil Liability for Doxxing Act,⁵ Full Circle is not providing tenant home address information, specific criminal history information, housing status information, or other personally identifiable information.

4) Question/Request from Neighbors: Provide a summarized view of the types of disabilities that allowed tenants to take residency:

a) Provide for the following properties

- i) Village Brook**
- ii) Creekview**
- iii) 5150 NW Highway**
- iv) Pearl Street**
- v) 1212 Larkin**

b) Full Circle will need to work with the respective housing authority that maintains this information to provide in a blinded, aggregated view that does not violate HIPPA

c) "we cannot provide this" is not an acceptable answer as the evidence we have gathered suggests "mental health" is the main disability used to qualify tenants and the neighborhood has the right to know if the tenants would primarily be young to middle age males with "mental health issues" that are under/unemployed as many of us have small children and a heavy concentration of such tenants in a small, high density housing complex obviously represents a potential risk

Full Circle Response: Federal, state, and local law prohibits Full Circle and municipalities such as Arlington Heights from making determinations about housing (and other issues) based on tenant disabilities, including whether a tenant has a disability or a specific type of disability.⁶ All Full Circle properties are disability-neutral and do not include or exclude individuals based on specific disabilities. Full Circle cannot and will not discriminate against anyone with a disability, including people with mental health issues. Accordingly, Full Circle cannot provide an assessment of tenants based on disability type.

Also note that Full Circle does not maintain or receive information about the types of disabilities that establish eligibility for its tenants' residency based on disability. Full Circle also cannot obtain this information from the respective housing authorities, not only because it would be problematic under applicable anti-discrimination laws but also because it is not maintained in the manner that

⁵ See Cook County Just Housing Amendment Interpretive Rules, § 760.120; Illinois Civil Liability for Doxxing Act, 740 ILCS 195/1 et. seq.; *available at* <https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=4444&ChapterID=57>.

⁶ For example, the Fair Housing Act, the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, the Illinois Human Rights Act, and the Cook County Human Rights Ordinance.

the question suggests. While the housing authority conducts a final screening, i.e. a check for tenant eligibility based on disability, it is determined by individualized documentation submitted by each applicant based on evaluation by their own health care provider/evaluator and the details about the underlying disability are not contained in these materials.

25 units (20 1BR and 5 2BRs) across 3.93 acres is not “high density housing.” The development has a Floor Area Ratio (FAR) of 16.5% (across three stories). The FAR represents how much square footage of building you can fit on a parcel of land. Code for the Office-Transitional district (what the site is currently zoned as) allows up to 80% FAR, meaning the building could cover up to 80% of the 3.93 acres if it were one story and up to 40% of the site if it were two stories.

The residential density (units/acre) of Grace Terrace is 6.36. As compared to other affordable and market-rate multi-family properties in Arlington Heights, the FAR and residential density is significantly lower for Grace Terrace (please reference table below).

Property	FAR	Residential Density
Grace Terrace [Proposed] (1519-1625 S. Arlington Heights Rd)	16.5%	6.36 units/acre
Linden Place (700 E. Golf Rd)	35.5% ⁷	16.6 units/acre ⁸
Timber Court Condominiums (3420 N Old Arlington Heights Rd)	81.7% ⁹	18.8 units/acre ¹⁰
Heart’s Place (120 W Boeger Dr)	52.6% ¹¹	19.4 units/acre ¹²
Crescent Place (310 W. Rand Rd)	30% ¹³	17.2 units/acre ¹⁴
110 S. Evergreen ¹⁵	207%	47.14 units/acre
320 W Campbell ¹⁶	200%	57.14 units/acre
The Albert Goedke House (215 W. Miner St) ¹⁷	147%	96.53 units/acre

Even when comparing density to the single-family homes to the east of our property, our site has less density based on number of bedrooms. The image below shows a site area that is less than 3.93 acres (the acreage of the proposed Grace Terrace site) and contains 13 single-family homes along S. Belmont Ave. and E. Parkview Ct. with a total of 59 bedrooms, which could certainly house more people than our proposed 20 1BRs and 5 2BRs (30 total bedrooms).

⁷ <https://www.loopnet.com/property/700-e-golf-rd-arlington-heights-il-60005/17031-08103020440000/>

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https://www.vah.com/government/departments/planning_community_development/housing/index.php#collapselinks-238-20b2

⁹ <https://www.loopnet.com/Listing/3420-N-Old-Arlington-Heights-Rd-Arlington-Heights-IL/22188840/>

¹⁰ Reference footnote above

¹¹ <https://www.loopnet.com/property/120-w-boeger-dr-arlington-heights-il-60004/17031-0308100060/>

¹² Reference footnote above

¹³ [file:///C:/Users/eoconnorbrooks/Downloads/Project_Narrative%20\(2\).pdf](file:///C:/Users/eoconnorbrooks/Downloads/Project_Narrative%20(2).pdf)

¹⁴ Reference footnote above

¹⁵

<https://cms2.revize.com/revize/arlington/Departments/Planning%20&%20Community%20Development/Developments%20&%20Projects/Eastman%20Project/Staff%20VB%20Presentation%20-%20Eastman%20Web%20Site%20Version.pdf>

¹⁶ Reference footnote above

¹⁷ Reference footnote above

Property	Acreage	Bedroom Density
1519-1625 S. Arlington Heights Rd [proposed site for Grace Terrace; please reference map below]	3.93 acres	7.6 bedrooms/acre
13 Single Family Homes along S. Belmont Ave. and E. Parkview Ct. [please reference map below]	3.83 acres	15.4 bedrooms/acre

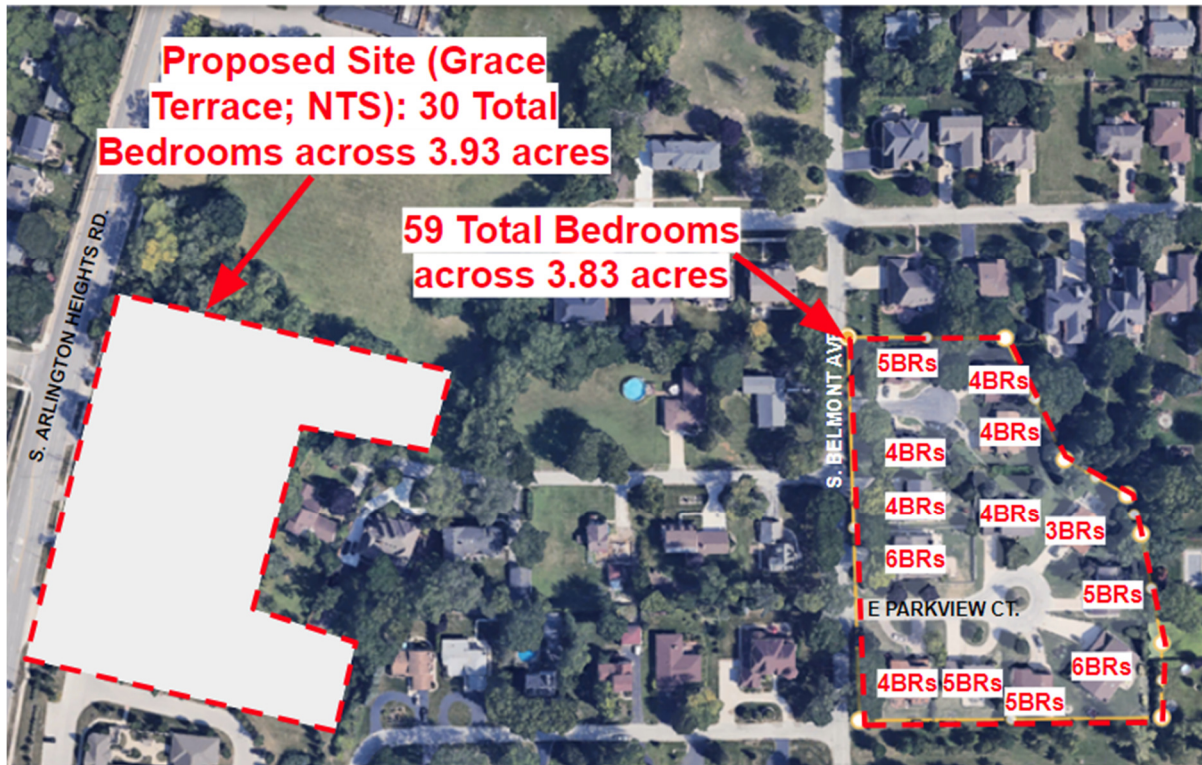


Figure 1: Map illustrating the Grace Terrace proposed site (shaded in gray) bedroom density as compared to a similar acreage of single-family homes to the west of the property (please note Google Earth was used to determine the acreage of the single-family homes along Belmont & Parkview and Redfin was used to determine the number of bedrooms/house).

5) Question/Request from Neighbors: How are rules monitored and enforced once a tenant takes occupancy? What happens when a resident commits a crime, violates the no-drug rule, or becomes a registered sex offender?

Full Circle Response: Full Circle employs a blended management approach at all its permanent supportive housing (PSH) properties. Blended management is a collaborative, team-based approach to working with residents. Blended management requires a distinct but complementary role for ownership, property management and supportive services. Communication expectations for blended management are intentionally robust so that staff can proactively resolve any issues on-site (including house rules and lease violations). Through the blended management approach, we can identify if there are any issues on-site and respond to them through both services and property management. If the offense is a material lease violation, an eviction procedure will be pursued.

In addition to having on-site staff during regular business hours, Grace Terrace will also have a robust security camera system that can be monitored remotely by our management staff 24/7.

Please note that as a landlord, we have had examples of criminal activities on and off properties where the police have shared that information with us. If the criminal activity is a lease violation, we would pursue an eviction. If criminal activity happens offsite, and police do not make us aware of the activity, then our staff would have no way of knowing as we are not constantly screening our tenants. As landlord, we are responsible for maintaining the housing and quiet environment within the community; we are not an arm of law enforcement.

6) Question/Request from Neighbors: How will Grace Terrace impact Crime rates in the Carefree Park Neighborhood on a per capita and aggregated basis? Please answer the following:

- a) **Current crime rate of property considered for development**
- b) **Expected crime rate based on information on Full Circle Properties mentioned above**
- c) **Current crime rate of Carefree Park Neighborhood**
- d) **Summarize in exhibit form**

Full Circle Response: Full Circle, as developers and managers of affordable housing, do not have expertise in crime statistics, and we would not be the best source to determine the current and expected crime rates for the property/neighborhood. The Village was asked a similar question in their FAQ that they published on May 17, 2024¹⁸ (question posed to Village: “*What impact on crime... do you expect the proposed Grace Terrace development to have on the neighborhood? What are the current per capita crime stats for the Carefree Park area? What impact would Grace Terrace have on these stats assume ~50 incidents and 50% being serious crimes (per the FOIA data we’ve pulled.)*”) and here was the Village’s response for reference:

“The Village cannot validate the statement above regarding calls for service (CFS) and level of calls. The Village has evaluated CFS data from Heart’s Place located in Arlington Heights. Heart’s Place is also permanent supportive housing (PSH) and has 18 units (all 2-bedroom units) and 36 bedrooms. In 2023 there were 15 police CFS at Heart’s Place. Full Circle/Grace Terrace is proposed at 25 units (5 2-bedroom & 20 1-bedroom) and 30 bedrooms. Total CFS data was also obtained from the City of McHenry, Illinois for Pearl Street Commons, a 25-unit PSH in that community, and [can be referenced in the image below].

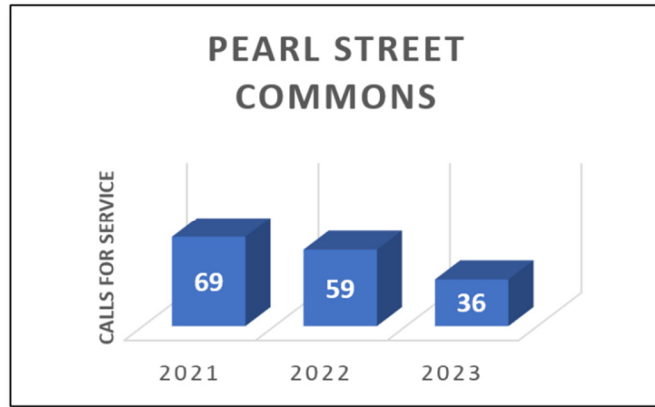
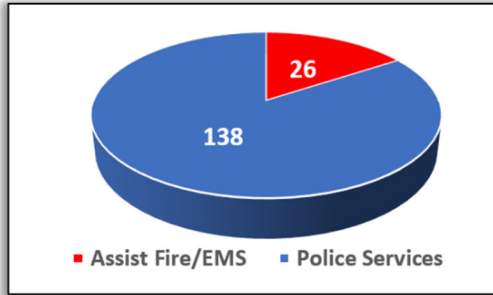
In the immediate area surrounding the proposed Grace Terrace development (police sub-beats 237 thru 240 east of Arlington Heights Road, south of Cypress, and north of Council Trail), there were 140 calls for service in 2022 and 168 in 2023. Of those calls for service approximately 6.5% (or an average of 10) were considered calls for service related to

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<https://cms2.revize.com/revize/arlington/Departments/Planning%20&%20Community%20Development/Developments%20&%20Projects/FCC%20Full%20Circle%20Communities/Village%20Response%20to%20Neighbor%20Questions%20-%20Full%20Circle%2005-17-24.pdf>

criminal activity. Nearly 25% of the total calls in the surrounding area were checks for well-being, firework complaints, public service and premise checks.”¹⁹

Pearl Street Commons located in McHenry, Illinois is a 25-unit building consisting of one and two-bedroom apartments.



This equates to an average of 2.18 calls per-unit, per-year.

Figure 2: Number of Calls for Service (CFS) at Full Circle's property in McHenry, IL (Pearl Street Commons)²⁰

The safety and security of our residents and staff, along with the surrounding community, is our highest priority. We foster strong relationships with first responders and have received letters of support or recommendation from many of the police departments where our properties are located. One such property is Creekview, a 25-unit senior living facility in Richmond, IL that Full Circle developed in 2017. The Chief of Police of Richmond wrote a letter testifying, “I believe the Creekview community is an excellent addition to the Village of Richmond. The Village of Richmond Police Department prides itself on the close working relationship we have with our residents and community, and I am pleased to see that Creekview similarly places such a high level of importance on this as well.” Please see Appendix I for the full letter.

In addition to fostering relationships with local first responders, residents are subject to a background check at initial occupancy [please reference question #3 for more information on our background check process]. Due to our funding sources and the corresponding federal and state regulations, our tenants and properties are subject to a higher level of initial vetting than what is required for tenants of market-rate residential or commercial spaces, along with buyers of single-family homes.

- 7) What has the mix of AMI 25% and AMI 50% typically been at comparable properties**
- a) **How many residents have no income**
 - b) **How is income status tracked post-occupancy**

Full Circle Response: 25% Area Median Income (AMI) is not a common threshold defined by the Department of Housing and Urban Development (HUD) and is not an AMI designated at Grace Terrace or the other Full Circle comparable property (Pearl Street Commons located in McHenry, IL).

¹⁹ Reference footnote above

²⁰ Reference footnote above

A property's AMI mix is driven by local housing need, the type of affordable housing it is, and the requirements of the funding sources. Grace Terrace is a permanent supportive housing (PSH) project funded primarily by the Illinois Housing Department Authority's (IHDA) PSH funds. Based on type of housing and funding type, the other comparable property in our portfolio is the Pearl Street Commons development in McHenry, IL. Grace Terrace and Pearl Street Commons have similar AMI mixes targeting PSH populations primarily at the 30% AMI level. Our third-party market study also confirmed there is a large demand for permanent supportive housing as other operators of this type of housing nearby report long waitlists.

In terms of the income of residents, there are no work requirements at Grace Terrace as that would restrict access for retired individuals or those with a disability that prevents employment. However, Full Circle requires evidence that the resident can pay for living expenses. People without employment would likely be receiving social security or disability income (SSDI) and/or assistance from relatives or friends which would help cover living expenses. Residents will also benefit from rental assistance that keeps their portion of the rent affordable. On-site services staff can also help residents increase their income self-sufficiency. Resident household income is recertified annually.

8) How do you ensure felons and sex offenders do not visit tenants?

Full Circle Response: All guests are subject to property lease and property rules and must abide by federal, state and local laws. Per the house rules, guests are not allowed to pose a threat to any resident or property staff, disturb the peace and quiet comforts of other residents, and/or interfere with management or maintenance of the property. Also, as part of our house rules, if it is discovered that the household allowed any registered sex offender to live in the unit, the resident must understand that they are no longer qualified to live on the property. If a guest violates the lease and/or house rules, the resident is responsible for the guest's behavior and therefore would be subject to eviction proceedings.

We should also note that the above rules provide for a stricter regulation of guests visiting the property as compared to single family homes that have no way of monitoring who their neighbors bring into the community. It should also be pointed out that under the current Office-Transitional zoning, a law office that serves felons and/or sex offenders could be built on the property.

Please also reference our response to question #5 for additional information on our blended management and robust security system.

Appendix I

Recommendation Letter from the Chief of Police of the
Richmond (IL) Police Department



RICHMOND POLICE DEPARTMENT

5600 Hunter Drive • Richmond, Illinois • 60071

815.678.2351

www.richmondilpolice.com

Chief Ciro Cetrangolo



June 18, 2018

Ms. Cecilia Serritella
Creekview Apartments
5615 Liberty Street
Richmond, IL 60071

Dear Ms. Serritella:

I am writing to let you know that I and the police officers of the Richmond Police Department very much enjoyed the recent Coffee with the Chief event at your location, and wanted to thank you for your gracious hospitality and the very warm reception we received.

Since that event, I have also had the occasion to meet more of your tenants and our new residents and wanted to comment that I believe the Creekview community is an excellent addition to the Village of Richmond.

The Village of Richmond Police Department prides itself on the close working relationship we have with our residents and community, and I am pleased to see that Creekview similarly places such a high level of importance on this as well.

In safety,

Ciro Cetrangolo
Chief of Police

CC/ga