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January 12, 2023

VIA CERTIFIED MAIL:

Stonegate Meadows Apartments LLC
c/o Elite Management Group LLC
200 Boulevard of the Americas, Suite 101
Lakewood, NJ 08701

REGISTERED AGENT:

Avraham Lapine
313 E Brandon Rd
Columbia, MO 65203

VIA CERTIFIED MAIL:

Stonegate Meadows LP
9666 Olive Blvd, Suite 690
St. Louis, MO 63132

REGISTERED AGENT:

COGENCY GLOBAL INC.
9666 Olive Blvd, Suite 690
St. Louis, MO 63132

RE: Unsafe, Unsanitary, and Uninhabitable Conditions at Stonegate Meadows

Dear Stonegate Meadows Apartments LLC, Stonegate Meadows LP, and Elite Management Group LLC:

The Heartland Center for Jobs & Freedom, together with a group of tenant leaders, write to address housing conditions at Stonegate Meadows Apartments (“Stonegate”). As you are aware, Stonegate is rife with dangerous, unsafe, unsanitary, and uninhabitable living conditions. Our preliminary investigation revealed substandard conditions property wide. Tenants are forced to live in homes infested with roaches, rodents, and other pests. Building-wide plumbing and structural problems result in serious leaks, standing water, black mold, and collapsed ceilings. Residents lack heat in frigid winter months and air conditioning during summer heat waves. And Stonegate’s general disregard for the property, grounds, and common areas creates an unsafe living environment where trash accumulates; unauthorized individuals are able to live in unsecured, vacant units and common areas; and a general lack of security endangers all community members.

The conditions at Stonegate Meadows are the direct result of years of neglect, disregard, and a deliberate indifference to the wellbeing of Stonegate tenants, and local, state, and federal law.

Stonegate Meadows Apartments LLC and its related entities have refused to meaningfully address these problems despite years of complaints, failed inspections, and overwhelming notice. Tenants have complained to Stonegate management and ownership in person and via writing for years, to no avail. Healthy Homes conducted at least 178 inspections, and documented over 500 violations, between October 29, 2019 and June 27, 2022. The Kansas City Health Department suspended Stonegate’s rental license on at least two occasions due to failed inspections, tenant complaints, and management/ownership noncompliance. Local housing authorities have put Section 8 recipients’ homes into abatement, pulled vouchers, and stopped issuing new vouchers to Stonegate tenants entirely. Multiple news reports have documented unsafe and unsanitary living conditions. Websites—including Google Reviews and Apartments.com—are littered with one-star reviews, detailed complaints, and tenants’ horror stories.

Even though Stonegate fails to adequately invest in or care for the property, it attempts to extract every penny from its tenants. While tenants' maintenance requests go unanswered Stonegate plasters tenants' doors with rent demands and eviction lawsuits, and pays tens of thousands of dollars to evict tenants en masse. In 2022 alone, Stonegate filed 64 eviction lawsuits against its tenants. Stonegate files eviction lawsuits indiscriminately, with complete disregard for the fact that it seeks rent from tenants whose homes are unlivable, including those who have had their Section 8 vouchers pulled because Stonegate failed to keep the property habitable.

Stonegate tenants have consistently notified property management and ownership of the issues in their homes to no avail. With conditions deteriorating further each passing year, they are now banding together to fight collectively for property-wide changes. In a good faith effort to seek change, the undersigned tenants make the following demands.

1. **Roach/bug treatment and prevention:** Stonegate must develop and implement a preventative roach/bug treatment program, where all buildings and units are treated preventatively, in accordance with industry best practices. Stonegate will provide tenants written notice, including with the date and specific time for all preventative treatments so tenants can plan accordingly. Stonegate will also promptly respond to all reports of roaches and provide treatment, in accordance with industry standards and best practices, to promptly and safely address the issue.
2. **Rodent/pest treatment and prevention:** Stonegate must promptly respond to all reports of rodents and pests on the property and do so according to industry standards and best practices. Treatment must be carried out so as to remove rodents/pests from the entire building, not just an individual unit.
3. **Bed bug treatment:** When bedbugs are reported, the issue will be investigated immediately and treated according to industry standards and best practices. Tenants will not be charged for treatment should bed bugs be discovered. Any charges to tenants for past bad bug treatment (as well as any related charges, such as late fees that may stem from a treatment charge) shall be removed from the respective ledger and tenants shall be reimbursed for those charges.
4. **Structural/physical inspections and repairs:** Every building, including its roof, foundation and individual units, must be evaluated for structural issues, including the structural integrity of the building/roof and ceilings, leaks, flooding, waterproofing, and plumbing issues. Stonegate will develop and implement a rehabilitation program to promptly make all needed repairs according to industry standards and best practices.
5. **Mold inspection and treatment:** When a tenant reports mold, the suspected mold will be tested and treated according to industry standards and best practices.
6. **HVAC:** All HVAC systems will be inspected to insure they are up to date and in working order, and all repairs will be conducted according to industry standards and best practices.
7. **Maintenance process:** Stonegate will develop and implement a maintenance request and status process, where tenants can submit and track the status of maintenance requests online. Stonegate tenants will also have the option to call, write, or submit in person complaints, all of which will be recorded by office staff and added to the maintenance portal for tracking and fulfillment.

The conditions at Stonegate violate the warranty of habitability and state consumer protection law. Tenants simply want Stonegate to fix and properly maintain the property, and are open to avoiding the cost and difficulty of litigation if Stonegate responds appropriately. If Stonegate brings the property into compliance with local, state, and federal law in a timely fashion it will be to the benefit of all.

We would like to meet in person to negotiate these issues and seek a commitment and agreed-upon timeline for changes to be made. We request a written response to this letter no later than ten days from today's date, and an in person meeting no later than February 13, 2023. Because the undersigned tenants below are now represented by counsel, please direct all future communications to johnbonacorsi@jobsandfreedom.org and ginachiala@jobsandfreedom.org.

Sincerely,

Stonegate Tenants' Counsel




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Stonegate Tenants



cc:

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