

# Unjust Outcomes in Lehigh Valley Landlord/Tenant Cases

## A COMPARATIVE REPORT

Lehigh Valley Justice Institute

September 15, 2022



### Abstract

We analyzed 10 years of landlord/tenant cases in Pennsylvania's Lehigh and Northampton Counties to quantify and compare the uphill legal battle that tenants face when their landlord files a case against them. Tenants rarely won cases, but Northampton County's fared better, winning 1.7% of cases compared to Lehigh County's 0.9% win rate ( $p < 0.05$ ). Having lawyers raised the proportions of tenant-won cases by 1200% and 470% in Lehigh and Northampton Counties, but few cases had them (1.3% and 2.1% respectively). Using American Community Survey data at the district level and simple linear regressions, we found that Lehigh County districts with higher proportions of Non-White and Hispanic people have lower rates of tenant wins ( $R^2 = 0.49, 0.44$ ), but not those in Northampton County ( $R^2 = 0.16, 0.03$ ). Tenants in higher per capita income (PCI) districts were associated with higher rates of lawyers, implying that poorer tenants were less likely to be represented and thus further disadvantaged ( $R^2 = 0.39, 0.29$ ). We found that tenants in 11 of 14 Northampton County and 8 of 14 Lehigh County districts have an average monthly rent greater than 30% of the district's PCI, indicating rent-burdening in these districts. These results suggest that all tenants face biases in the renting legal landscape, but poorer tenants (especially those who are members of marginalized groups) are disproportionately affected. We recommend giving tenants resources and legal information upon case filing as well as funding mediation programs to help replace evictions with settlements. This study was conducted to provide knowledge to help guide housing reform efforts and programs assisting Lehigh Valley renting families.

©2022, Lehigh Valley Justice Institute. All rights reserved.

## About the Lehigh Valley Justice Institute

---

The Lehigh Valley Justice Institute (LVJI) is an independent nonpartisan research, policy, and advocacy organization working to develop and promote a reimagined criminal justice system that is equitable and fair for all communities. The Institute employs a data-driven approach focused on the criminal justice processes within the Lehigh Valley area of Pennsylvania.

The Institute employs a three-step approach to study and reform, including:

1. **Research** - Utilizing the abundant academic resources of the Lehigh Valley and beyond, the Institute provides a solid empirical, data-driven approach to assessing the current deficiencies and inequities inherent in local criminal justice processes;
2. **Policy Development** - Building upon solid data analysis and modeling and research of innovative and best practices nationwide, the Institute develops policy and procedural recommendations for the management of the local governmental systems; and
3. **Advocacy** - The Institute promotes the adoption of its recommended policies and procedures through interaction with stakeholders, both community and governmental, public education and awareness, news media, and LVJI's media platforms.

## Contributors

---

This report was authored by Ms. Victoria Wrigley, M.S., Data Scientist for LVJI. Ms. Wrigley conducted all data analysis. This report was completed under the direction of Mr. Joseph E. Welsh, Executive Director of LVJI. We thank LVJI colleagues Ms. Halle Nelson and Ms. Nicole Levy for their thoughtful edits and contributions.

## Background

The renting landscape is bleak for tenants. Nationally rent is increasing at the fastest rate in decades,<sup>1</sup> and rental units are becoming unaffordable to more and more Americans.<sup>2</sup> With exploding rent and stagnating wages, cases filed by landlords against tenants have skyrocketed,<sup>3</sup> most of which were eviction filings.<sup>4</sup> The Lehigh Valley was not spared. In Pennsylvania, rent rose by 33% from April 2020 to April 2021.<sup>5</sup> From 2013 to 2019, Lehigh County saw a 28% increase in landlord/tenant cases and Northampton County saw a 92% increase in landlord/tenant cases (see Figure 1).<sup>6</sup> The Housing Alliance of Pennsylvania reports that Lehigh and Northampton Counties in 2021 had the third and sixth highest eviction filing rates in the state respectively.<sup>7</sup> Civil cases and evictions can lead to a host of adversities, including homelessness and physical and mental distress.<sup>8</sup> These crises have been shown to contribute to higher rates of crime and recidivism.<sup>9</sup>

In March of 2022, the Lehigh Valley Justice Institute released a report quantifying the inequities in Lehigh County's landlord/tenant legal system.<sup>10</sup> The results were solid and intriguing. They revealed deep imbalances in case dispositions that were in strong favor of landlords and suggested racial and ethnic identities were significant in determining case outcomes, further disadvantaging people in an already gloomy situation.

The dramatic findings inspired the Institute to embark on the same research in Lehigh County's neighbor, Northampton County. A comparative report allows for examination of these issues both within and between counties. We sought to recognize the demographic factors behind these disparities and their ripple effects to better understand the challenges Lehigh Valley tenants face. Addressing these challenges not only helps tenants from experiencing the devastating consequences of eviction, but also aids landlords, benefits the community, and bolsters the economy.

## Methodology

Data were obtained from the Administrative Office of Pennsylvania Courts (AOPC) and contain cases filed by the landlord(s) against their tenant(s) in

### Landlord/Tenant Case Filing Trend

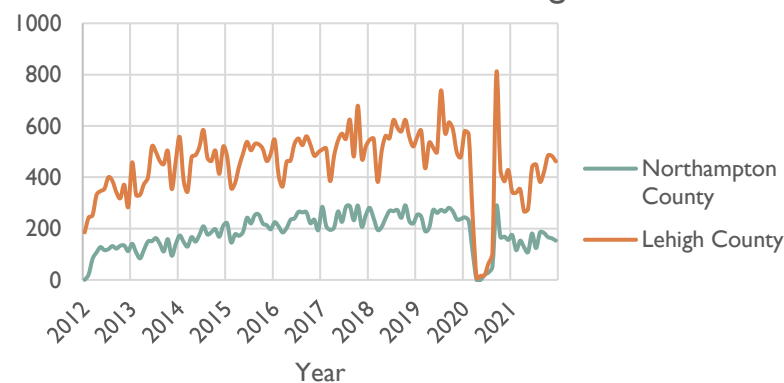


Figure 1: Number of Cases Filed by Month

Lehigh County's district courts from 1/18/2012 through 1/17/2022 and Northampton County's district courts from 2/22/2012 through 2/21/2022.

We took racial, ethnic, and economic data for both counties' Census tracts from the 2019 American Community Survey (ACS). We mapped tracts to the counties' 2022 magisterial districts. Where several tracts existed within a district, total quantities were summed. Per capita income was calculated by multiplying each tract's average household income by its total number of households to obtain the tract's aggregate income, then summing across all tracts and dividing the sum by the district's population.

Data cleaning methods were identical to those of the Lehigh County report. A case's disposition was determined as the most recent listed disposition. Some cases with multiple defendants had multiple dispositions. To give landlords the benefit of the doubt, any case with at least one disposition in favor of a tenant was marked as a win for all involved tenants. Then, a case's final disposition was determined with preference to the following order: settled, landlord win, withdrawn, dismissed.

Only closed cases were considered in the analysis. Cases with dispositions of Sent to Common Pleas were removed, and the disposition Default Judgment for Defendant was merged with Judgment for Defendant. The final Lehigh County and Northampton County datasets had 53,726 cases and 22,071 cases, respectively.

# Results

## Tenants Won Pitifully Few Cases but Won More Often in Northampton County

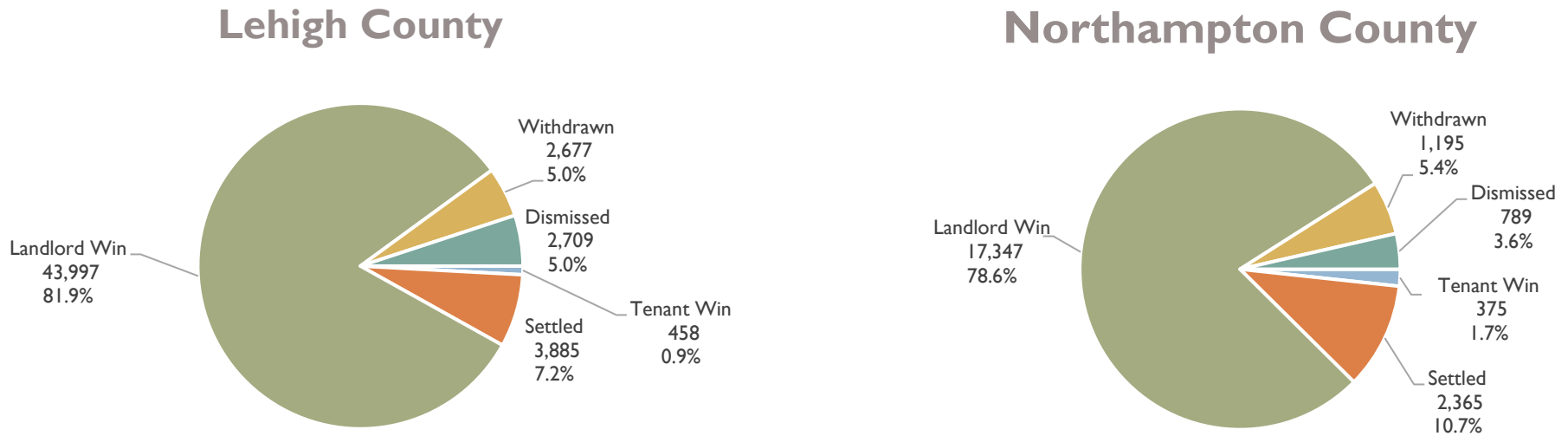


Figure 2: Distribution of case dispositions in (a) Lehigh County and (b) Northampton County

Out of the 53,726 landlord/tenant cases filed in Lehigh County, tenants won an appalling 458 cases, just 0.9%. This means that, out of 1,000 cases, only 9 were decided in favor of the tenant. Tenants in Northampton County fared slightly better. Out of the 22,071 landlord/tenant cases filed in Northampton County, 375 were decided in favor of the tenant, just 1.7%. This equates to just 17 out of 1,000 cases. Despite both counties having such small proportions of cases decided for tenants, a two-proportion z-test demonstrates that Northampton County tenants won significantly higher proportions of cases than Lehigh County tenants ( $p < 0.05$ ). Similarly, Northampton County landlords won a smaller proportion of cases than Lehigh County landlords ( $p < 0.05$ ).

This difference in distribution spans all case dispositions. A Chi-Square test of homogeneity shows that proportions of case outcomes were significantly different in Northampton County ( $p < 0.05$ ). While Northampton County tenants had a greater likelihood of winning a case, the overwhelming majority of cases were decided in favor of the landlord. Moreover, many tenants who reach settlements with their landlords still don't receive justice. One University of Chicago study showed that landlords frequently do not follow through on settlement agreement conditions, as they are often unenforced or made without legal representation.<sup>11</sup>

This imbalance in outcomes already suggests that this process is difficult and unfavorable for tenants. Deeper analysis suggests the sources of those challenges.

# Lawyers Dramatically Increased Tenant Wins, More So in Lehigh County

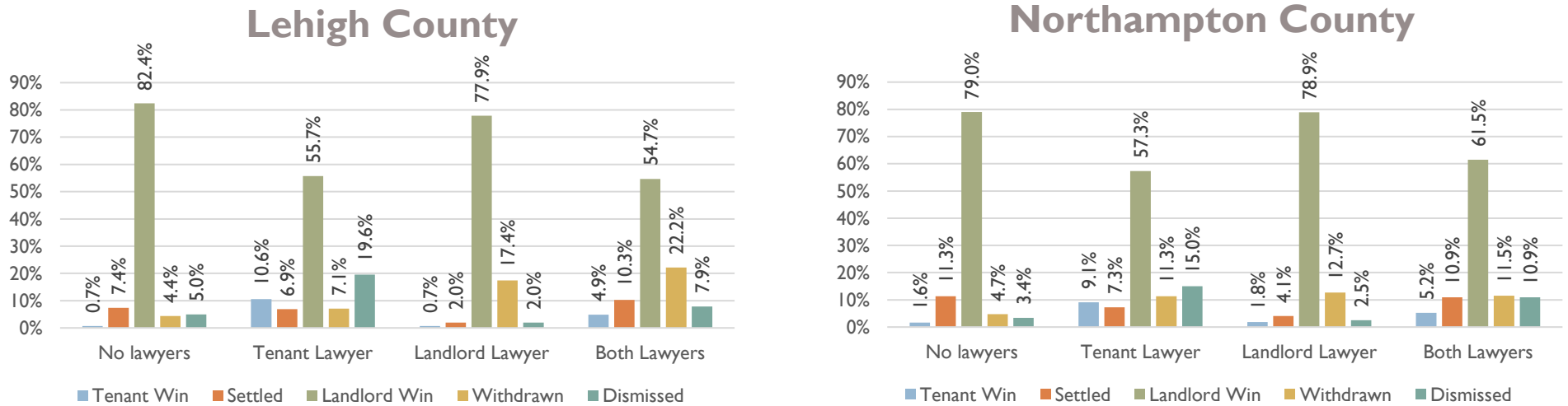


Figure 3: Distribution of dispositions by legal representation in (a) Lehigh County and (b) Northampton County

Having access to an attorney helped even the playing field. In our last report on Lehigh County, we found that when tenants had lawyers and landlords did not, the percentage of cases won by tenants increased by approximately 1200%. Northampton County saw this as well; tenant wins rose from 1.6% to 9.1% when they had a lawyer, an approximate 470% increase. In both counties, cases with tenant lawyers have larger proportions of dismissed cases. Chi-Square homogeneity tests show significant differences in case outcomes by representation in each county ( $p < 0.05$ ).<sup>12</sup> However, 94.6% of Lehigh County cases and 90.7% of Northampton County cases did not have any lawyers involved.

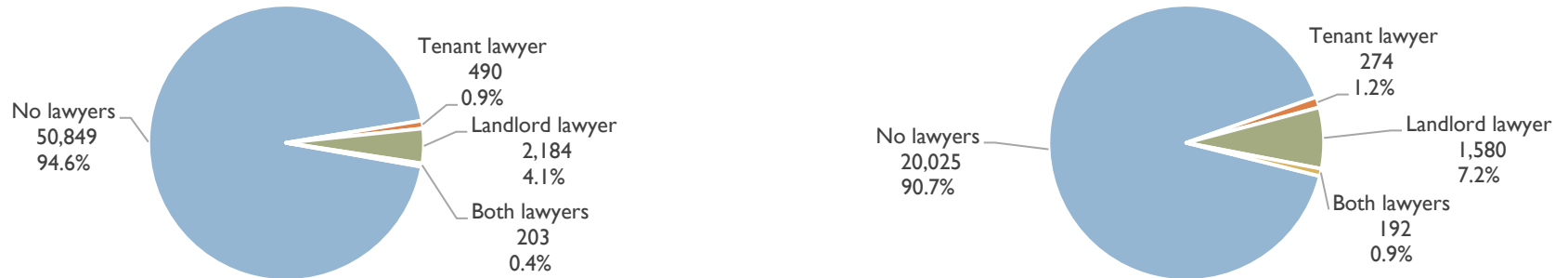


Figure 4: Distribution of legal representation in (a) Lehigh County and (b) Northampton County

## Racial and Ethnic Makeup Are Related to Tenant Loss Rates in Lehigh County

### Lehigh County

District	Population	Poverty Rate	Case Rate	LossPct	PCI	Non-White Percent	Hispanic Percent
31101	20,985	34.8%	39.4%	99.5%	\$15,353	44.9%	69.1%
31102	19,519	22.4%	37.7%	99.2%	\$19,816	34.4%	45.1%
31103	10,065	16.8%	43.2%	99.4%	\$26,827	36.6%	37.8%
31104	26,151	19.6%	39.6%	99.8%	\$21,528	34.4%	52.1%
31105	26,992	11.4%	18.7%	99.1%	\$29,368	16.9%	23.9%
31106	13,793	14.7%	16.2%	96.7%	\$26,372	19.9%	33.1%
31107	30,768	6.3%	10.3%	95.5%	\$29,733	20.0%	19.0%
31108	20,231	12.6%	6.8%	98.8%	\$35,809	21.9%	25.6%
31201	11,781	32.8%	48.8%	99.6%	\$13,856	42.2%	64.1%
31202	36,056	4.2%	2.8%	97.3%	\$41,294	10.9%	8.4%
31203	18,056	6.7%	10.0%	95.8%	\$40,660	10.6%	8.2%
31301	26,326	7.7%	3.5%	95.7%	\$38,529	3.5%	3.5%
31302	26,500	3.8%	7.9%	98.8%	\$45,057	13.5%	7.7%
31303	31,296	3.6%	2.0%	97.9%	\$48,522	6.8%	4.7%

### Northampton County

District	Population	Poverty Rate	Case Rate	LossPct	PCI	Non-White Percent	Hispanic Percent
03104	28,020	3.7%	5.1%	99.0%	\$ 42,775	18.5%	11.5%
03201	6,656	11.2%	18.3%	95.2%	\$ 27,740	21.0%	24.9%
03203	23,921	4.0%	5.9%	97.7%	\$ 40,089	17.3%	9.3%
03204	16,623	5.3%	2.6%	97.5%	\$ 49,002	6.6%	7.4%
03205	12,037	8.1%	11.8%	98.8%	\$ 25,052	25.7%	15.5%
03206	15,967	11.5%	15.9%	98.5%	\$ 30,557	26.8%	19.2%
03208	26,395	8.0%	4.4%	99.3%	\$ 36,246	5.7%	6.7%
03209	38,892	2.8%	1.9%	98.2%	\$ 41,486	15.4%	9.6%
03210	16,065	22.9%	15.2%	98.4%	\$ 14,627	33.7%	39.9%
03211	19,055	19.7%	15.3%	97.9%	\$ 27,383	23.5%	41.3%
03212	14,783	13.8%	20.4%	99.1%	\$ 25,526	25.1%	20.1%
03301	34,006	7.7%	4.8%	99.1%	\$ 31,772	5.1%	5.3%
03302	22,923	5.4%	2.5%	98.5%	\$ 35,151	1.2%	2.0%
03303	27,466	7.4%	4.2%	97.0%	\$ 30,688	5.5%	6.5%

Table 1: District statistics in (a) Lehigh County and (b) Northampton County

While tenant race, ethnicity, and income are not recorded by the AOPC in landlord/tenant cases, we were able to investigate district trends by comparing demographic statistics from the 2019 ACS for each district. Non-White Percent represents the percentage of district residents that are not members of the White race alone; Hispanic Percent represents the percentage of district residents who self-identified as Hispanic. LossPct denotes the percentage of cases that tenants lost, and case rate is the ratio of cases to district population expressed as a percentage. Table 1 compares these statistics in each district. Columns are shaded relative to their maximum and minimum values; larger values in a column are darker and smaller values are lighter. This makes trends and relationships between measurements easily discernable.

Many of these relationships are easy to explain. Poorer districts – those with higher poverty rates and lower per capita incomes (PCIs) – have higher case rates, most likely because it is more difficult for those tenants to pay rent. Furthermore, racial and ethnic minorities tend to have lower incomes than Non-Hispanic White people, so it is not surprising that more diverse districts have higher poverty rates.<sup>13</sup>

In our previous report on Lehigh County, we found that tenants in poorer districts (those with lower PCIs) tend to lose cases at higher rates than those in wealthier districts. Notably, we also found that the proportion of cases that tenants lose, denoted by LossPct, is more strongly related to a district's racial or ethnic makeup than its PCI. Essentially, a district's diversity is a better predictor of the percentage of cases tenants lose than its income.

We quantified this using regression  $R^2$  statistics. A model's  $R^2$  statistic is a measure between 0 and 1 of how well the model fits the data, with larger values corresponding to better fits. Values close to 1 imply a strong relationship between the two measures. The  $R^2$  values relating Lehigh County's districts' Non-White Percent and Hispanic Percent to LossPct are 0.49 and 0.44 respectively, while the  $R^2$  value relating the districts' PCI with LossPct is 0.24. **This shows that in Lehigh County a district's racial or ethnic makeup is a better indicator of case outcomes than PCI.**

Northampton County does not echo this pattern. Lehigh County's  $R^2$  values indicate that the racial and ethnic variables have reasonable associations with LossPct. In Northampton County, the  $R^2$  values for Non-White Percent and Hispanic Percent with LossPct are 0.16 and 0.03, which indicate extremely weak associations. Furthermore, the  $R^2$  relating Northampton County districts' PCI to LossPct is very nearly 0, meaning that there is no relationship between the two measures. To summarize, both counties' Non-White Percent and Hispanic Percent have stronger relationships to the percentage of cases that tenants lose than PCI, but Northampton County's are much weaker – in fact, **Northampton County's relationships are too weak for definitive evidence of racial and ethnic disparity.**

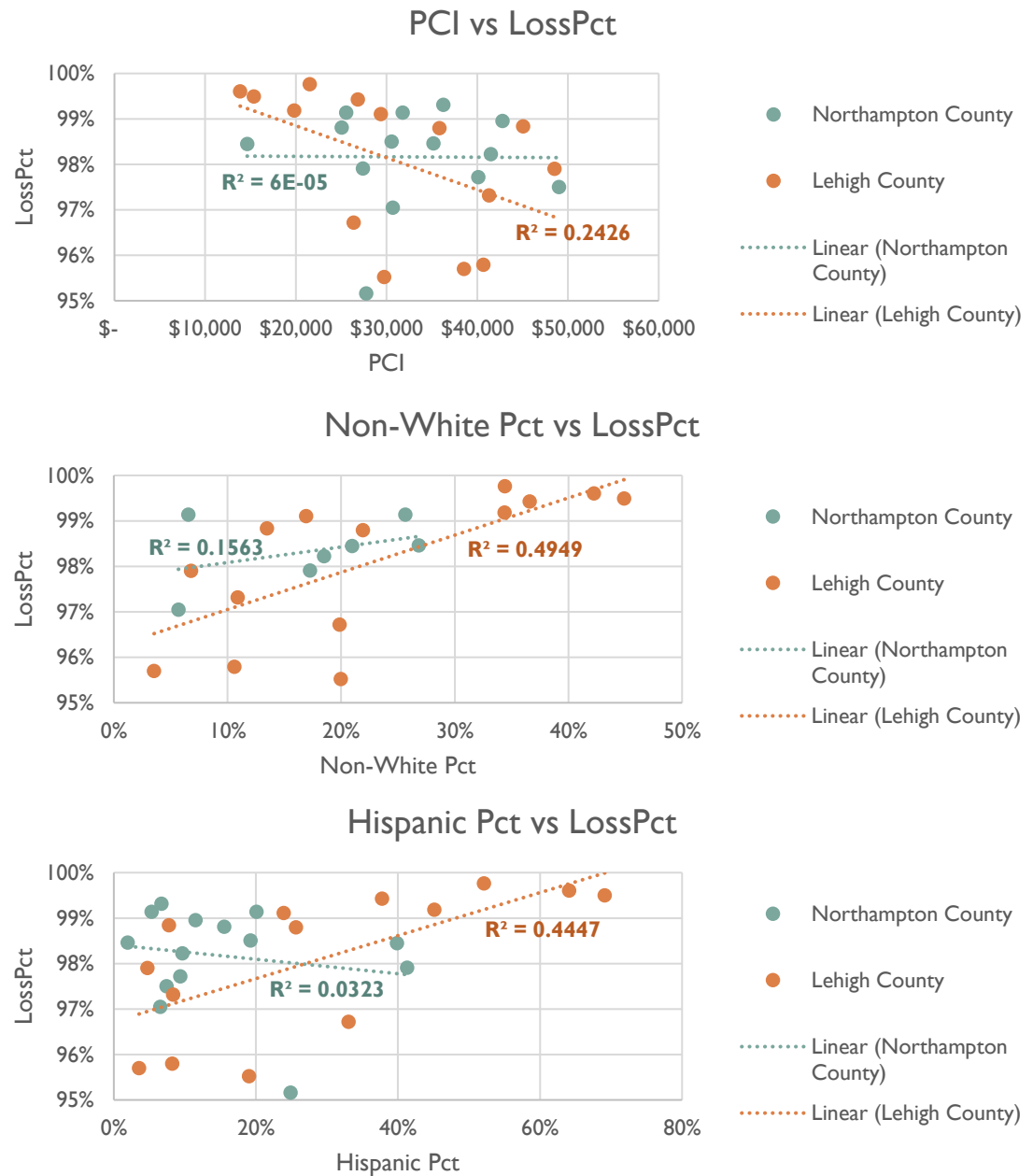


Figure 5: Scatterplots of districts' (a) PCI, (b) Non-White Percent, and (c) Hispanic Percent by LossPct

## Disparities Accumulate for Greater Disadvantage

The incredibly small tenant win rates in both counties, 0.9% in Lehigh County and 1.7% in Northampton County, suggest that landlord/tenant courts strongly, and perhaps unreasonably, favor landlords. While this already puts tenants through hardship and distress, further disparities within this system disproportionately affect marginalized groups.

We saw that tenant lawyers dramatically increased tenant win rates, but few tenants had representation. Over the past 10 years, only 466 cases (1.3%) in Northampton County and 693 cases (2.1%) in Lehigh County had lawyers representing tenants at all. These rates differed among districts.

Figure 5 graphs districts' PCIs against the rates that the tenants had lawyers. We defined a district's tenant lawyer rate as the district's percentage of cases in which tenants had representation. We counted cases in which both parties had representation in this calculation. The positive slopes of both counties' regression lines demonstrate that tenants in wealthier districts were more likely to have a lawyer represent them. Though the associations are not strong ( $R^2$  values are 0.29 for Northampton County and 0.39 for Lehigh County), the upward trend is still indicative of this relationship. This is a straightforward result, as wealthier defendants are more likely to be able to afford a lawyer. **However, as tenants with lawyers were more likely to win their cases, this disadvantages poorer tenants who do not have access to legal resources.**

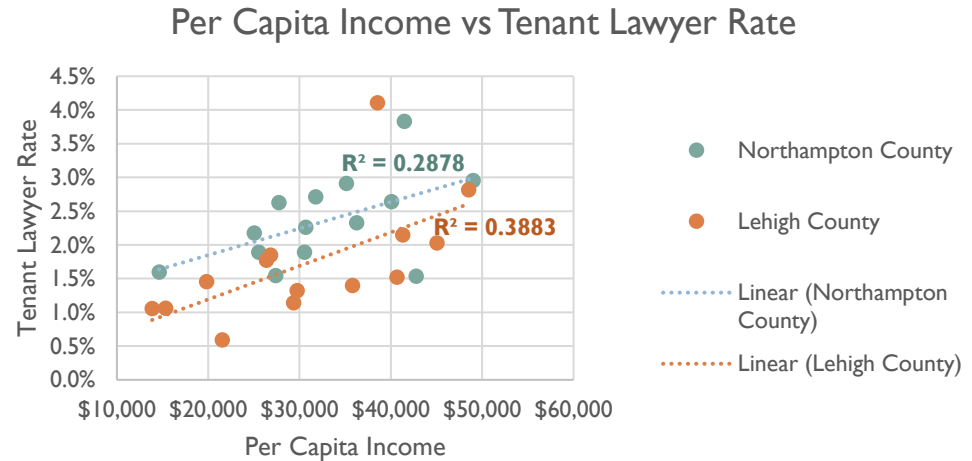


Figure 6: Scatterplots of district PCI by Tenant Lawyer Rate

	Lehigh County		Northampton County	
	Non-White Pct	Hispanic Pct	Non-White Pct	Hispanic Pct
Poverty Rate	0.84	0.94	0.42	0.82
PCI	Non-White Pct	Hispanic Pct	Non-White Pct	Hispanic Pct
	0.81	0.89	0.37	0.47
Case Rate	0.88	0.83	0.64	0.60

Table 2:  $R^2$  values between racial/ethnic variables and wealth variables in both counties' districts

This disparity is compounded further by the correlation between district wealth and diversity. Table 2 contains  $R^2$  values for Non-White Percent and Hispanic Percent with two measures of district wealth: poverty rate and PCI. These large statistics indicate strong relationships between the racial/ethnic variables and the wealth variables. These findings are consistent with nationwide studies which found that certain racial and ethnic minorities tend to earn less than Non-Hispanic White people.<sup>14</sup> Moreover, the high  $R^2$  values for Non-White Percent and Hispanic Percent with case rate indicate that more diverse districts have more cases filed. While we do not have racial or ethnic data on the tenants, **we can infer that minority groups have a greater likelihood of going through this judicial process, and as such the inequity in landlord/tenant case dispositions disproportionately affects these groups.**

## Discussion

Poorer districts probably have higher case rates because those tenants have greater difficulty paying rent. This propagates an oppressive cycle of poverty. An eviction case is extremely detrimental to a tenant's financial and mental well-being. Even if the tenant wins, the filing goes on record, and that can make obtaining housing extremely tough.<sup>15</sup> Their credit scores are negatively affected, they may need to take time off work to attend court dates, and they can become homeless.<sup>16</sup> These financial burdens can cause intense stress and anxiety and can lead to physical troubles.<sup>17</sup>

Financial experts advise that families should spend at most 30% of their income on housing to reserve funds for necessities such as transportation and food.<sup>18</sup> Tenants who spend more than this are said to be "rent burdened." To investigate rent burdening among Lehigh Valley tenant defendants, we averaged the monthly rent of each district as reported in the case files, multiplied those by 12, then divided by the district's PCI to obtain the district's average rent as a percentage of income. We found that 11 of 14 Northampton County districts and 8 of 14 Lehigh County districts had percentages greater than 30% and were strongly associated with poorer districts ( $R^2 = 0.59, 0.84$ ). Tenant defendants in poorer districts are much more likely to be rent burdened.

When they lose a case, tenants do not only owe rent in arrears but also a variety of fees, including but not limited to attorney fees, court costs, filing fees, and server fees. On average, a losing tenant pays the court \$102 in Lehigh County and \$123 in Northampton County. This is demanded of people who could not deliver rent money in the first place. It is an extra charge for being poor.

Having a lawyer increased the probability of winning, but the chances were still slim. Few tenants secured a lawyer, so this competitive advantage was infrequent.

We found that poorer districts have higher populations of Non-white and Hispanic people. It follows that these groups are disproportionately affected, as they navigate this complex process more than Non-Hispanic White people.

Even with advantages and disadvantages within certain groups, tenants as a whole face an unforgiving renting atmosphere. Tenants won just 0.9% and 1.7% of cases in Lehigh and Northampton Counties, respectively. With these statistics, an eviction filing risks criminalization for being poor. Homelessness is a cause of criminal recidivism, so addressing alternative dispute resolution is a crucial branch of criminal justice reform.

We echo the recommendations from our March 2022 report. Giving tenants information on representation and rental assistance programs before their hearing would help them navigate the complicated legal process and stay in their homes. We recommend that tenants be provided with this information and other resources upon the court's acceptance of the landlord's complaint, or before the acceptance. Furthermore, a settlement mediation program would help both parties reach mutual agreements. We recommend funding mediation programs focusing on equitable settlements that avoid and prevent evictions. These programs should have legal experts involved to ensure both parties adhere to settlement conditions.

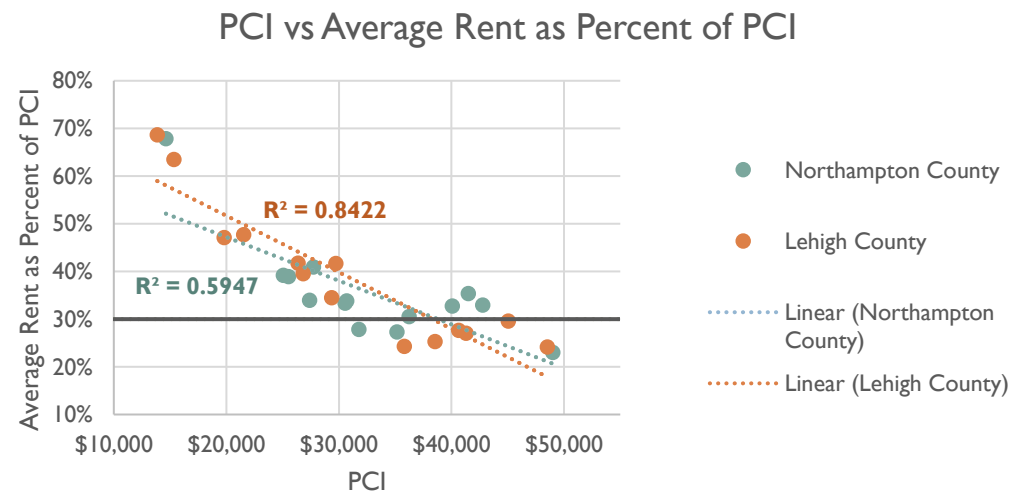


Figure 7: Scatterplots of district PCI by average rent as a percent of PCI



## Limitations

---

This study was observational, so causal conclusions cannot be drawn from these results. This does not invalidate the findings of the study.

Some cases with multiple defendants had varied dispositions. For ease of analysis, only one disposition was used per case. Final dispositions were selected with the approach described in Methodology. This may have skewed the proportions of tenants who win cases to be more than it is. As these proportions are already extremely small, we do not believe the potential skew to be significant.

AOPC does not record tenants' income information or racial or ethnic identity, so more precise relationships between these variables and case data could not be drawn. Nevertheless, we are confident that a district-level picture using ACS data provides valuable results.

## Future Work

---

This study builds on our March 2020 report, Legal Landscape for Lehigh County Renters, and provides a bigger picture of the Lehigh Valley by comparing its two counties. While this study illuminates many obscured and cumulative issues in the Valley's renting landscape, there is still more work to be done to get a complete picture. Analysis of cases filed by tenants against their landlords is imperative to put these results into context and to understand the challenges, advantages, and atmosphere that tenants encounter. It would also help clarify the landlord's perspective in renting disputes of all natures. Just as settlements in cases are preferable to evictions, this examination may help ease tensions between landlords and tenants and may help local lawmakers design mutually beneficial solutions.

The Institute is currently planning several projects to explore housing and its relation to criminal justice. We intend to examine how stable housing and re-entry programs reduce recidivism by assisting convicts after being released from incarceration. Secondly, we aim to investigate how the Department of Housing and Urban Development's Fair Housing Act's exception of a felony drug manufacturing conviction in rental prohibition perpetuates racism, income inequality, housing inequality, and recidivism.<sup>19</sup>

## Conclusion

---

Ten years of landlord/tenant case data in the Lehigh Valley expose the uphill battle that tenants fight when their landlord files a case against them. The probability of winning the case is 0.9% in Lehigh County and 1.7% in Northampton County. These chances increased significantly by 1200% and 470% respectively when the tenant had a lawyer, but tenants in poorer districts were less likely to secure legal representation. Combine this with the fact that poorer districts had higher proportions of Non-white and Hispanic people and the disparities accumulate to imply that tenants who are poor and those who are members of racial/ethnic minority groups struggle through this complex judicial system more than wealthier tenants. With the average rent of defending tenants being greater than 30% of their district's PCI in nearly two-thirds of Lehigh Valley districts, and cases being massively favored for landlords, it is clear that Lehigh Valley tenants face an unfriendly and unforgiving renting landscape that propagates a repressive cycle of poverty, housing instability, and homelessness. These conditions have been proven to produce crime and increase recidivism nationally.

Definitive action is imperative to confront these issues and to help tenants and their families stay in their homes instead of on the street or in jail. Providing tenants information on representation and rental assistance programs would help them avoid potential conflicts, navigate the complex process, and keep their homes. Additionally, settlement mediation programs would resolve disputes with positive solutions for both the landlord and the tenant. Addressing this issue would not only assist tenants but would also help landlords maintain consistent income and support the community by reducing homelessness and crime. As these goals improve economic development, increase property values, and save taxpayer money, solving these challenges benefits everyone in the Lehigh Valley, not just renters.

## Endnotes

---

- <sup>1</sup> Zilber, Ariel. 2022. "US rent prices highest in decades — and they aren't coming down." *New York Post*, February 1. <https://nypost.com/2022/02/01/us-rent-prices-highest-in-decades-and-theyre-not-coming-down-data-shows/>.
- <sup>2</sup> McCarthy, Niall. 2019. "Rent Is Becoming Unaffordable For Many U.S. Workers." *Statista*, June 25. <https://www.statista.com/chart/18485/housing-wage-compared-to--median-hourly-wages/>.
- <sup>3</sup> Riquier, Andrea. 2019. "The eviction crisis is starting to look a lot like the subprime mortgage crisis." *MarketWatch*, March 30. <https://www.marketwatch.com/story/the-eviction-crisis-is-starting-to-look-a-lot-like-the-subprime-crisis-2019-03-26>.
- <sup>4</sup> McKenna, McCausland & Murphy, PA. n.d. "The Top 5 Reasons Tenants Get Evicted." Accessed June 2, 2022. <https://litigationadvocates.com/2019/10/29/reasons-for-eviction/>.
- <sup>5</sup> Leckie, Jon. 2022. "Rent Report May 2022." *Rent.com*. May 13. <https://www.rent.com/research/average-rent-price-report/>.
- <sup>6</sup> The number of cases filed by month utilized active, inactive, and closed cases.
- <sup>7</sup> The Housing Alliance of Pennsylvania. 2022. "Revealing Opportunities and Challenges: An Analysis of Eviction Filings in Pennsylvania." <https://housingalliancepa.org/eviction-data-report/>.
- <sup>8</sup> Burrowes, Kimberly. 2020. "Can Housing Interventions Reduce Incarceration and Recidivism?" *ShelterForce*, March 9. <https://shelterforce.org/2020/03/09/can-housing-interventions-reduce-incarceration-and-recidivism/>.
- <sup>9</sup> Jacobs, Leah, and LauraEllen Ashcraft. 2019. *Residential Instability, Homelessness, and Criminal Recidivism*. January 18. Accessed June 3, 2022. <https://sswr.confex.com/sswr/2019/webprogram/Paper35722.html>.
- <sup>10</sup> Read our Lehigh County report "Legal Landscape for Lehigh County Renters" on our website at <https://www.lvji.org/resources>.
- <sup>11</sup> Summers, Nicole. 2019. "The Limits of Good Law: A Study of Housing Court Outcomes." *University of Chicago Law Review, Forthcoming* 87: 145. Available at SSRN: <https://ssrn.com/abstract=3387752>.
- <sup>12</sup> In both Chi-Square homogeneity tests, some expected counts were 5 or less, so the results may not be accurate.
- <sup>13</sup> PK. 2021. "Income by Race: Average, Top One Percent, Median, and Inequalities." *DQYDJ*. Accessed February 22, 2022. <https://dqydj.com/income-by-race/>.
- <sup>14</sup> United States Census Bureau, "Hispanic Origin," Last modified October 8, 2021, <https://www.census.gov/topics/population/hispanic-origin.html>; The Census Bureau defines Hispanic as an ethnicity rather than a race. Therefore, citizens mark their race and Hispanic ethnicity separately, and Non-White does not imply non-Hispanic
- <sup>15</sup> n.d. *I have an eviction on my record. Is there anything I can do to get it off?* Accessed June 3, 2022. <https://www.communitylegalaid.org/node/1309/i-have-eviction-my-record-there-anything-i-can-do-get-it>
- <sup>16</sup> Landon, Heather Leigh. n.d. "The Consequences of Eviction." *Sapling*. Accessed June 3, 2022. <https://www.sapling.com/8012467/consequences-eviction>.
- <sup>17</sup> Merrefield, Clark. 2021. "Eviction: the physical, financial and mental health consequences of losing your home." *The Journalist's Resource*, October 15. <https://journalistsresource.org/economics/evictions-physical-financial-mental-health/>.
- <sup>18</sup> McCarthy, "Rent is Becoming Unaffordable."
- <sup>19</sup> Read about the Fair Housing Act guidelines here: [https://www.hud.gov/sites/documents/HUD\\_OGCGUIDAPPFHASTANDCR.PDF](https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF).