

A publication of Michigan Realtors®

MICHIGAN REALTOR®

WWW.MIREALTORS.COM

MARCH 2024



CAVEAT EMPTOR
makes REAL SENSE



PLUS

Capitol Report

Fair Housing

President's Report

MICHIGAN
RPAC
2023 Major Investors

Volume 23 | Number 2

MICHIGAN REALTORS®



BROKER
SUMMIT



FAIR=HOUSING
SUMMIT

Join us in Lansing April 3-4 for a 2-day event. On April 3rd, the Michigan Realtors® Broker Summit brings together elite brokers and Realtors® from around the state to address current real estate and market trends that impact your bottom-line. Attendees will gain powerful insight about critical business strategies and tools for successfully running their brokerages. Day 2 features the Michigan Realtors® Fair Housing Summit. Fair housing is more than a list of dos and don'ts, rights and penalties, and mandatory continuing education. As stewards of the right to own, use and transfer private property, fair housing protects our livelihood and business as Realtors® and depends on a free, open market that embraces equal opportunity. Fair Housing Makes US Stronger.

www.mirealtors.com

MICHIGAN REALTORS®

ACHIEVE

Thank you, 2024 Achieve Sponsors!



Features

- 06 **What's New in Fair Housing?
Trending Caselaw and
Licensing Changes**
Ensuring that we follow the law
by Rebecca Berke, Esq.
- 08 **The Seller Disclosure Act From
The Buyer's Point Of View**
Caveat emptor makes real sense
by Gail A. Anderson, Esq.
- 12 **2023 Michigan RPAC Major Investors**

COVER STORY

MICHIGAN**REALTOR**[®]

Departments

- 02 **President's Report**
Telling our story
by Sandi Smith
- 04 **Capitol Report**
Sorting through the legislative stalemate
by Brad Ward, Esq.

{ MARCH | TWO THOUSAND & TWENTY FOUR | VOLUME TWENTY THREE | NUMBER TWO }

03.24



BY SANDI SMITH

Telling Our Story

As we near the end of the first quarter of 2024, the feeling of bringing a College Football National Championship to the state of Michigan still resonates. And while Coach Harbaugh now chases his own dream of NFL success, I still find myself reflecting on the long road to Michigan's perfect season. In some ways, I see parallels to the season that our own Realtor® team has had these past two years – and, perhaps, draw inspiration for what the future might hold for our own undertakings. The ability to stay laser focused on those areas that we can control, to pursue professionalism and excellence in the face of criticism, uncertainty and adversity will help us ultimately prevail because of that unified sense of purpose. From an aspirational perspective, I want this year and beyond to showcase that kind of resolve. I want us to be champions for our clients and our industry.

With that message fresh in my mind, I applaud all of you who attended the Achieve Conference in Ann Arbor this past January. Over 250 Realtor® Leaders and industry affiliates were in attendance for two days of knowledge, networking and to celebrate local RPAC achievements. At the President's Reception, it was a powerful moment for me to stand alongside the newly elected officers and directors as they recited their oath to serve as your 2024 leadership team. City of Ann Arbor Mayor, Christopher Taylor had the honors of commencing the installation. Christopher and I had served on the Arbor City Council together years ago, which is a fine example of the benefits of volunteerism and leadership. The opportunity to showcase my hometown and meet the future leaders of our association was a fantastic way to start the year.

Throughout the conference, the overarching theme was storytelling as entrepreneurs, to the benefit of our industry. We do so much more than sell homes. We serve as ambassadors for our communities. Local associations and major investors were recognized for their collective accomplishments during the Michigan RPAC Awards. 2024 NAR Realtor® Party Fundraising Liaison, Kitty Wallace, was our keynote speaker and reminded us of the resilience of our membership during the start of the pandemic. Check out the full list of our 2023 RPAC major investors in this magazine.

Looking ahead, our next event is the Broker Summit on April 3rd at the newly renovated DoubleTree by Hilton Lansing. This is a beneficial event for all Realtors®, but specifically Brokers and Office Managers, and there will be a legal update specific to Brokers. Additionally, we are excited to host the 2nd annual Michigan Realtors® Fair Housing Summit. Located in the same venue the following day, on April 4th, the Fair Housing Summit will feature some inspirational speakers and provide many educational resources available to you. As stewards of the right to own, use and transfer private property, fair housing protects our livelihood and business as Realtors® and depends on a free, open market that embraces equal opportunity. As I was present for the signing of Michigan Realtors® supported House Bill 4717 in 2023 (fair housing elective continuing education requirement), it was a reminder that we are making progress as an industry, but still have a long way to go. Fair Housing Makes US Stronger.

BROKER SUMMIT X FAIR HOUSING SUMMIT

April 3-4, 2024

DoubleTree by Hilton Lansing, Lansing

1-Day Passes Available

Remember that our theme is to focus on the way in which we can better showcase the value of volunteering to our colleagues. How do we get them to see themselves in our association? And by extension, how do we get them to become engaged in their Realtor® associations with a sense of purpose? One of the hallmarks of belonging to an association is to rely upon our collective strength to do great things. But our collective strength is only as powerful as the dynamic personalities and individual talents that comprise the whole. Just like a National Champion football program needs to recruit for the future, we too need to look for talent all around us.

Many of us who volunteer are here by virtue of someone's encouragement. That was certainly the case for me. So, as a gentle challenge, I ask that you seek out a few Realtors® at your local association with whom you've been impressed and encourage them to share their talents with the association. Sometimes all it takes is the invite!

I look forward to seeing you in Lansing in April. ●



PRESIDENT
Sandi Smith
 GRI, E-pro
 AAABoR

PRESIDENT-ELECT
Christopher M. Germain
 ABR, PSA, SRS
 UPAR

TREASURER
Mark Oegema
 WMLAR

CHIEF EXECUTIVE OFFICER
Robert Campau, Esq.
 RCE, CAE
rcampau@mirealtors.com

EDITOR/ADVERTISING
Joe Kras
 MBA, SAG-AFTRA
jkras@mirealtors.com

CHANGE OF ADDRESS/UNSUBSCRIBE
Kaetana Beech
kbeech@mirealtors.com

2024 Michigan Realtors® Board of Directors: District 1 Matt Hodges, (Aspire North Realtors®); District 2 Richard Adgate, (West Central Association of Realtors®); District 3 Mike VanderWoude, (Greater Regional Alliance of Realtors®); District 4 Suzzette Deaux, (Greater Kalamazoo Association of Realtors®); District 5 Kimberly Gibbs, (Jackson Area Association of Realtors®); District 6 Jodie Franklin, (Ann Arbor Area Board of Realtors®); District 7 Aaron Fox, (Greater Lansing Association of Realtors®); District 8 Michele Papatheodore, (East Central Association of Realtors®); District 9 Chelsea Cain, (Greater Metropolitan Association of Realtors®); District 10 Al Block, (Greater Metropolitan Association of Realtors®); District 11 Karen Greenwood, (Greater Metropolitan Association of Realtors®); District 12 Hassan Ahmad, (Greater Metropolitan Association of Realtors®); District 13 Deanna Coleman, (Southeastern Border Association of Realtors®); Past President Bill Milliken (Commercial Board of Realtors®); Large Office Camille Elsea Peterek, (North Oakland County Board of Realtors®); Large Office Adam Paarlberg, (Greater Regional Alliance of Realtors®); Jason Makowski (CAR Representative); Terry Bixler (CBOR Representative); Local Association Rep. Amanda Lankerd (Battle Creek Area Association of Realtors®)

Michigan REALTOR® provides information about the real estate profession and news of Michigan Realtors® and its members. Opinions expressed in signed feature articles are those of the author and do not necessarily reflect the viewpoint of Michigan Realtors®. Advertising of property, services or products herein does not imply endorsement by Michigan Realtors®.

Michigan REALTOR® (ISSN 1053-4598, USPS 942-280) is published four times per year (January, March, August, November) by the Michigan Realtors®, 720 N. Washington Ave., Lansing, MI 48906.

Address letters, address changes and inquiries to: Michigan REALTOR®, 720 N. Washington Ave., Lansing, MI 48906: 800.454.7842: Fax 517.334.5568. www.mirealtors.com: e-mail contact@mirealtors.com. Subscription rates: \$8 per year (included in dues) for members, \$25/year nonmembers. Periodicals postage-paid in Lansing, Michigan 48924 and additional mailing offices. POSTMASTER: Send address changes to the Michigan REALTOR®, 720 N. Washington Ave., Lansing, MI 48906.

April 3-4, 2024
 Broker Summit x Fair Housing Summit
 DoubleTree by Hilton, Lansing

September 25-27, 2024
 The Convention
 Soaring Eagle Casino & Resort, Mt. Pleasant

SCAN THE QR CODE
 TO GO DIRECTLY TO
 MICHIGAN REALTORS®
 WEBSITE FOR UP-TO-DATE
 EDUCATION & EVENTS



Find Michigan Realtors® on your favorite social networking sites:





Sorting Through The Legislative Stalemate

This year's start to the legislature has been busy. However, the work being done in committee has not translated to much legislation passing out of either the House or Senate. This is due in large part to the current 54/54 Democrat/Republican split in the Michigan House of Representatives.

The House Dems started out this session, in 2023, with a 56/54 seat majority in the House. That majority came to an end when two sitting state Representatives were successful in their bids to become mayor of their respective hometowns. The House rules allow the Democrats to maintain control of the gavel as far as Speaker of the House and Committee majorities, but the Republicans are trying their best at a play for a shared power agreement. This power struggle has led to very few bills moving from the House, and the Senate is currently being respectful and not loading up a bunch of bills in the House Chamber.

This April will bring about a special election to fill the two current vacancies. Since both districts have strong Democratic bases, a return to a 56/54 split seems like a reality. However, with a statutory budget deadline of June, and August primary, and November general election in the House, the timeframe in which to get things done seems narrower by the day. In these first few months Michigan Realtors® has been able to lay the groundwork on some important legislative priorities we are “supporting,” while holding at bay issues we are “opposing.”

Opposing/ A Real Estate Transfer Tax Increase

The fight continues against the wrong-headed \$50 million increase in the Real Estate Transfer Tax, proposed by the Michigan State Housing Development Authority (MSHDA). Making all housing and commercial property more expensive in the name of government programs for affordability is counterproductive and detrimental to the supply of housing in Michigan.

Sellers already face tough financial choices when making the decision to move. They are faced with higher interest rates. Potentially higher property tax bills, especially if they've lived in their property for several years. A higher transfer tax is just one more hurdle for them to overcome. This proposal would have a chilling effect on generating inventory from Michigan's existing housing stock. Additionally, large

desperately needed commercial projects like multi-family or adaptive reuse face a huge financial burden through higher transfer taxes, jeopardizing the feasibility of these projects and the housing units they'll provide.

Not to mention, simply putting more money towards housing does nothing to address the core reasons that development is more expensive. Inflation and local/state regulations/zoning add cost and prevent many of these affordable options.

We appreciate everyone that responded to the Call for Action against this proposal. The strength of our association was truly on display.

Supporting/Regulation of Right to List Service Provision Agreements

Senate Bill 602 seeks to put consumer protections around an emerging scheme where for a one-time payment, typically \$300-1300, a seller grants a real estate brokerage the right to list their property for upwards of 40 years. In addition to the right to list, a real estate firm also secures the right to list by placing a lien on the property for let's say, 3% of the sales price.

The bill makes clear that this agreement is not a listing agreement and provides guardrails to ensure that a prospective seller has clear disclosure, a 2-year limit on the lien, and a far more reasonable cost to terminate one of these contracts (initial payment +6% for each of the 2 years). Senator Hertel's intent is to remove the predatory nature of some of these arrangements.

This bill passed through the Senate Regulatory reform committee and is currently on the Senate floor.

Supporting/ Increased Land Division Act Splits

Michigan's housing shortage did not arrive overnight and it will not go away overnight. Since there isn't one proposal that will create more and attainable housing, we need to continue to put tools in the hands of local governments and developers to chip away this problem. Senate Bill 480 is one of those tools that would allow denser and quicker development of parcels outside of the traditional platting and site condominium process, by increasing the number of splits available for the first 10 acres from 4 to 20. Additionally, the bill would allow local governments to approve splits

To get REALTOR®
PARTY MOBILE ALERTS,
text "Realtor" to 30644 .

beyond the formula in the Land Division Act to create infill development. This is an incentive that doesn't rely on government subsidies or tax breaks, it creates savings by streamlining the development process.

This change will not work for every municipality. Some may welcome the change others may not. Local government zoning and regulations will still determine the buildability of these lots. Items like lot size, setbacks, well, septic and other infrastructure will still be a factor in allowing for development by land split.

The bill passed out of the Senate in late 2023 and just received its first hearing in the House Local Government and Municipal Finance Committee.

Supporting/ Uniform Partition of Heirs Property Act

Heirs' property is property passed to a family member through inheritance without a will or estate. This legislation is a partnership between the Uniform Law Commission, the National Association of REALTORS®, and Michigan Realtors®, among other stakeholders. It is an effort to make sure that people inheriting property are given due process and fair notice to protect their property interest should a fellow relative or third-party try to force a partition through sale or court order.

A common story is where heirs have fallen prey to unscrupulous investors or family members that sell or gain control of family lands through the partition process leaving the other heirs with little to nothing for their interest. This measure would put protections in place to make sure that all heirs receive notice, a right of first refusal, and a fair appraisal of the property before it could be partitioned. This will help preserve wealth in many families.

The bills passed out of the House Judiciary Committee unanimously and are currently awaiting a vote on the House floor.

Supporting/ Zoning and Master Plan Grants for Local Governments

Last year Michigan Realtors® and other housing stakeholders successfully secured \$5 million dollars in the state budget to use for grants to local governments to redo their zoning and master plans to provide changes that would promote new and cheaper housing.

Last year's funding recently became available, and the program is being utilized. It is our hope to build on this success and continue funding these grants as we look to reduce local/state regulations that prevent housing development or contribute to its increasing cost.

Opposing/ Heavy-handed State Regulation and Taxation of Short-Term Rentals

Michigan Realtors® is also working to defeat a new legislation to regulate short-term rentals. These bills are significantly different than the bill we supported and passed through the House last session. This new bill package takes a heavy-handed regulatory approach (inserting state government into the shoes of local government in many instances) and creates a significant amount of new excise and Convention and Visitor Bureau (CVB) taxes on any individual that would choose to rent out their home, even for one night.

These bills do not protect the ability to rent, nor do they define short-term rentals under the zoning enabling act. Our position is Michigan needs to define the activity and protect the right to rent before discussions on taxation and registration at the state level can occur. We are not opposed to these concepts, but without protecting the right to rent, additional bans and moratoriums will strip property rights from homeowners across Michigan.

This package of bills was recently introduced in the Michigan House of Representatives but has yet to receive a hearing in committee. We continue to play a constructive role to find a landing spot with local government, lodging and tourism, and CVBS to protect the right to rent under reasonable guidelines.

Please be sure to stay up to date on all the latest goings on with Michigan Realtors Public Policy by visiting <http://www.mirealtors.com/Advocacy-Initiatives>, or subscribing to and liking our YouTube channel <https://www.youtube.com/MICHREALTORS>. ●

SCAN THE QR CODE TO GO DIRECTLY TO MICHIGAN REALTORS® WEBSITE FOR UP-TO-DATE ADVOCACY INITIATIVES





What's New in Fair Housing?

Trending Caselaw and Licensing Changes

April is just around the corner, which means that Fair Housing Month is almost upon us. In past editions of this spring publication, we've shared Fair Housing updates, Q&A's and general best practices designed to help Realtors® understand and comply with Fair Housing law. This year, we're keeping to the theme and discussing a recent Fair Housing addition to Michigan's continuing education requirements for all real estate licensees, as well as new caselaw from across the nation that involves various aspects of housing discrimination, including appraisal bias, redlining, discriminatory housing policies and reasonable accommodations.

Redlining

In *Consumer Financial Protection Bureau v. Trident Mortgage Company*, the CFPB alleged that a mortgage company (Trident) violated the Equal Credit Opportunity Act (ECOA), the Fair Housing Act (FHA) and the Consumer Financial Protection Act (CFPA) by engaging in redlining in the Philadelphia, Pennsylvania, Camden, New Jersey and Wilmington, Delaware metropolitan areas.¹

By way of background, "redlining" is a discriminatory practice in which certain services (often mortgage lending or insurance services) are denied to residents of a particular area based on the race, color, national origin (or other protected classifications) of the residents who live in that area. The denial of services is not based on an individual's actual creditworthiness or other qualifications, but instead based

solely on where that individual lives.

The complaint alleged that that Trident actively avoided providing credit services to certain neighborhoods specifically because of the race, color, and national origin of people living in those neighborhoods. The complaint also alleged that loan officers and other Trident employees exchanged work emails that contained racial slurs and referenced communities of color as "ghetto." In one email exchange, a senior loan officer wrote, "talked to [agent]...He said to stay away from sears street, its [sic] upper ghetto blocked off bad area just a heads up." Another Trident loan officer, in regard to a customer prequalification, wrote to a lead coordinator, "This one is in the ghetto, pass [sic] it along to ian. HAHAHAAHHA kidding."

Before going to trial, Trident agreed to a consent order in which the company will:

- 1) Invest \$18.4 million in a loan subsidy fund that will be used to increase credit extended in minority communities of Philadelphia;
- 2) Invest \$750,000 for development of community partnerships to provide services that increase access to residential mortgage credit in those neighborhoods;
- 3) Invest \$850,000 for advertising and outreach in those neighborhoods;
- 4) Invest \$375,000 for consumer financial education; and
- 5) Pay a civil penalty of \$4 million.

There's much to take away from this litigation. The most glaring is the

unfortunate reminder that redlining and other systemic denials of service are not bygone of the past and may still act as barriers to homeownership for some individuals. Realtors® who suspect that their clients have fallen victim to redlining, should file a complaint with their local Fair Housing Center or the CFPB at <https://www.consumerfinance.gov/complaint/>.

Appraisal Bias

In *Tate-Austin v. Miller*, Paul and Tenisha Austin, a black couple brought suit against a home appraiser. The Austins had their home appraised as part of a refinancing process. The home initially appraised at \$995,000. The Austins believed the appraisal to be too low and requested a new appraisal with a different appraiser. Before the next appraisal took place, the Austins removed any personal belongings from the home that might suggest that a black family lived in that home (family photos, artwork, books, hair products, etc.). They replaced their family photos with photos of a white family and had a white friend pose as the homeowner and greet the second appraiser. The second appraiser valued the home at \$1,450,000 – a difference of \$455,000 when compared to the first appraisal.²

The appraiser asked the Court to dismiss the case, but the Court ruled that the allegations brought forth by the Austins were enough to at least "make it plausible" that race could have been a "motivating factor" in the home valuation. After that ruling, but before proceeding to

trial, the parties agreed to a monetary settlement – the amount of which was not disclosed to the public.

This case made headlines across the nation, shining a spotlight on the rise of allegations involving disparities in home valuation based on race. Regardless of whether these claims are the result of unconscious bias, a lack of training or something more intentional (and agreeably more egregious), Realtors® must be tuned in to these issues so that they are able to recognize any red flags in the appraisal process and advocate on behalf of their clients.

What can Realtors® do when they suspect that their client's home may have been undervalued because of the client's race, color, or other protected class status? The National Association of Realtors® (NAR) suggests the following best practices:

- *Seek out the lender's policies for preventing and addressing bias in appraisals, criteria for selecting appraisers and whether they require Fair Housing and/or implicit bias training.*
- *Provide the appraiser with relevant objective property data (e.g., records of recent property updates, repairs, etc.) and be available to answer questions about the property.*
- *Educate the client about how to go about requesting a reconsideration of value from the lender if information is incorrect or if relevant comparison data was not considered during initial appraisal.*
- *If improper bias is suspected, contact the Appraisal National Complaint Hotline (877-739-0096), or file a complaint directly with HUD, the Consumer Financial Protection Bureau, state licensing board, or local housing civil rights authorities.*³

Discriminatory Housing Policies

In *Department of Fair Employment of Housing v. Vasona Management*, a San Francisco Bay Area fair housing advocacy group alleged that Vasona Management (a housing provider) discriminated against families with

children by adopting overly restrictive rules for their owned and managed apartment complexes.⁴ Vasona owns more than 30 apartment complexes and manages 48 apartment complexes in the San Francisco Bay area.⁵

The lawsuit alleged that the defendants implemented rules that prohibited outdoor play activities and required parents to supervise children under the age of 14 in all common areas. Tenants who did not adhere to these rules were threatened with eviction.

The parties entered into a settlement agreement in which Vasona agreed to:

- 1) *pay \$3 million in damages to families impacted by the discriminatory policies,*
- 2) *implement new, non-discriminatory policies subject to review by the California Civil Rights Department,*
- 3) *provide four hours of annual training to all Vasona personnel and*
- 4) *implement other corrective policies designed to prevent housing discrimination (including ways for tenants to report discrimination).*

This case serves as a good reminder to real estate professionals that when implementing housing policies, the policies should focus only on the property – not on the person who is occupying the property. Housing rules and policies should never be targeted to one specific protected classification. If a rule is only applicable to a member of a particular protected classification (e.g., families with children, individuals with a disability, etc.) then that rule is likely a violation of Fair Housing law.

To avoid these mishaps, housing providers should only implement rules that can be applied to all tenants. For example, instead of implementing a rule that prohibits parents from leaving “children’s toys” in commons spaces, the housing provider could, instead, implement a rule that prohibits all tenants from leaving “personal property” in common spaces. The modified rule has the same effect of keeping common spaces clear and tidy but

is applicable to all residents – not just families with children.

Fair Housing Continuing Education

Although we are over 50 years removed from the passage of the Fair Housing Act, the unfortunate reality (as evidenced by the above-mentioned cases) is that housing discrimination still exists in today's market. Recognizing the importance of Fair Housing education, Michigan Realtors® supported recent legislation to mandate one hour of annual Fair Housing training for all real estate licensees in the State of Michigan. Governor Whitmer signed this legislation into law in November 2023, and the new requirement took effect on February 13, 2024. The new law does not add any additional hours of continuing education to the current requirement (18 total hours per licensing cycle), nor does it modify the current legal continuing education requirement (2 hours per year). It instead carves the fair housing requirement out of the current elective hours.

Michigan Realtors® acknowledges this new education requirement as an opportunity for real estate licensees to raise the bar for the real estate industry and reaffirm their commitment to providing equal, consistent customer service to all. Realtors® who are seeking new Fair Housing education opportunities can visit www.cemiway.com to access the newest Fair Housing course developed by your Michigan Realtors® legal team. ●

- 1 *Consumer Financial Protection Bureau v. Trident Mortgage Company LP*, No. 2:22-cv-02936 (E.D. Penn. July 27, 2022) (complaint and consent order filed).
- 2 *Tate-Austin v. Miller*, No. 21-cv-09319-MMC (N.D. Cal. 2023).
- 3 “Homeowners Enter Settlement Agreement with Appraiser in Racial Bias Suit”, Retrieved, January 12, 2024, <https://www.nar.realtor/legal-case-summaries/homeowners-enter-settlement-agreement-with-appraiser-in-racial-bias-suit>.
- 4 *Department of Fair Employment and Hous. v. Vasona Property Management, Inc.*, No. RG20078727, (Alameda Cnty. Superior Ct. 2023).
- 5 “National Fair Housing Alliance Trends Report 2023”, Retrieved, January 11, 2024, <https://nationalfairhousing.org/resource/2023-fair-housing-trends-report/>.

SCAN THE QR CODE
TO GO DIRECTLY
TO THE MICHIGAN
REALTORS®
CEMIWAY WEBSITE



THE SELLER DISCLOSURE ACT FROM THE *Buyer's point of view*

BY GAIL A. ANDERSON, ESQ.

When we talk about the Seller Disclosure Act, we typically look at it from the seller's point of view. What do sellers need to disclose? When are they required to update the seller's disclosure form? Which sellers are exempt? This article will look at the statute from the buyer's point of view. Buyers should understand how and to what extent they can rely on representations made in a seller's disclosure statement. Before looking at recent case law, let's review the following basic rules:

1. *Sellers have no obligation to volunteer all relevant information about the property. A seller's only obligation is to honestly answer specific questions in the seller's disclosure statement. If a buyer or buyer's agent has questions about the property which are not covered by the seller's disclosure form, they need to ask them.*
2. *The seller's disclosure statement is not a warranty of any kind. If it turns out that the information is false, the buyers will have no claim unless they can prove that the seller knew the information was false.*
3. *It is not always the case that a buyer can terminate a purchase agreement if the buyer can show that one of the representations in the seller's disclosure form is false. The seller's only duty to amend the disclosure statement is in the event of changes to structural/mechanical/appliance items. As to other*

items, it is only necessary that the seller believed that the representations were accurate at the time the seller's disclosure statement was signed.

4. *Michigan courts do not generally protect buyers who appear to have been purposely ignorant. When issues are raised – whether in the seller's disclosure statement, in the inspection report or from the buyer's own observations – it is generally the case that a buyer has an obligation to investigate further.*

The Michigan Court of Appeals recently applied these rules of law in a case filed by the Buyers after discovering that the home they had purchased needed over \$120,000 of repairs. The trial court threw out the case against the Seller and the Buyers appealed.

Two of the many alleged defects were the presence of mold and a water meter grounding issue. The Court held that the Buyers had no claim against the Seller as to these defects for the simple reason that the seller's disclosure statement does not ask any questions about these items. Unlike in a number of other states, Michigan sellers do not have a duty to volunteer all relevant information concerning the condition of their home. In Michigan, a seller's duty is to answer specific questions honestly – whether asked in the seller's disclosure statement or by the Buyers directly. Here, there was no inquiry as to these issues and, therefore, no claim for fraud based on these defects.



Build your future.

When planning a new home construction project, it's important to choose the right lending partner. GreenStone's financing process is designed to support your project from blueprints to closing. We custom build each loan, offering both do-it-yourself and fully-contracted options.

To get started on your future home, contact your local GreenStone team today.

800-444-3276



GreenStone[®]
FARM CREDIT SERVICES

www.greenstonefcs.com

On the other hand, several of the Buyers' alleged defects in the home – water in the basement, roof leaks and drainage problems – were covered by specific representations in the seller's disclosure statement. According to the Court:

In the seller's disclosure statement, [Seller] answered "no" in response to a section asking: "Basement/ Crawl Space: Has there been evidence of water?" [Seller] also answered "no" to a question asking whether there were any roof leaks on the property. [Seller] further answered "no" to a question asking whether there were any "[s]ettling, flooding, drainage, structural, or grading problems" on the property.

These statements all turned out to be false. The Buyers claimed that the Seller had known these statements were false and, moreover, that the Seller had tried to conceal some of the damage in the basement by painting, covering the crawl space and replacing the trim.

The Court of Appeals held that even if the Buyers could prove that the Seller knew these representations were false, the Buyers here had no claim for fraud. A fraud claim, the Court said, requires not only proof of an intentional misrepresentation, but also proof that the Buyers reasonably relied upon the false statement. Here, the Buyers had hired a home inspector who had identified the alleged defects in his report. The Court said:





Buyers should understand how and to what extent they can rely on representations made in a seller's disclosure statement.

Regarding the roof and siding, [the Buyers'] pre-sale home inspection report stated that the roof would need to be replaced within a few years and that a plumbing vent below the chimney was leaking because it could not be properly flashed. It further indicated that the roof lacked additional flashings, which could cause leaks. Regarding the grading of the property around the foundation, the report stated that "[i]n the grade at the front of home rear of home left side (facing front) right side (facing front) the house is flat. We recommend a 10 degree slope away from the house to properly drain water away." Regarding water damage to the basement, the report merely stated that "[i]n here are signs of water penetration in the past. We would recommend that precautionary measures be taken to prevent future problems. Examples: (Install proper grading around the house and install gutters and downspouts to divert water away from the house.)"

Given the contents of the inspection report, the Court concluded that the Buyers did not reasonably rely on the representations of the Seller in the seller's disclosure statement. The Court held that based upon the information in their inspection report, the Buyers had had a duty to investigate and corroborate whether the Seller's representations in the seller's disclosure statement were true. Under the purchase agreement, if the Buyers were dissatisfied with the inspection report, they could have terminated the contract or asked the Seller to make repairs. Instead, the Buyers chose to close and purchase the property "as is." For these reasons, the trial court threw out the case against the Seller and the Court of Appeals agreed with that decision.

YOUR CLIENTS WILL LOVE YOU FOR IT.

Tell them about down payment assistance loans up to \$10,000 with MI 10K DPA.* Combined with a Conventional, Rural Development, or FHA home loan, they can buy the home they've been eyeing. More at Michigan.gov/Homeownership or call 1.844.984.HOME

*Terms and conditions apply.

\$10,000 DOWN PAYMENT ASSISTANCE LOANS



Equal Housing
Employer/Lender



MSHDA
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY

In another recent case decided by the Michigan Court of Appeals, the Buyers had sued the Sellers when they discovered several defects after closing, including water damage and significant improperly done repair work. It was subsequently discovered that there had been a fire in the home several years before it had been sold. While the Sellers had not specifically mentioned that fire in their seller's disclosure statement, they had answered the following question in the affirmative:

Are you aware of any of the following:

** Major damage to the property from fire, wind, floods or landslides*

unknown _____ yes X no _____

Since the Sellers had answered this question truthfully, the Court held that it had then become the responsibility of the Buyers to inspect the property to determine the nature and extent of the damage.

In this second case, the Sellers had not provided any response to the form's request for an explanation if the answer to any of the itemized questions was "yes." In fact, as noted by the Court, the explanatory statements following this line item had been "whited out." Under similar circumstances, a Texas court recently held that the Seller was required to provide an explanation after indicating "yes" to a question regarding "previous flooding into the structure." The Texas court's view was not only that an

explanation was required, but also that such explanation must be complete. It would seem unlikely that a Michigan court would reach the same conclusion. The language in the Michigan statutory form does not indicate that the explanations are mandatory. Moreover, "explanations" are generally viewed not as questions that must be answered but as an opportunity for the seller to explain why the defect should not be viewed as a deal-breaker.

Conclusion

Michigan courts have not been very receptive to buyers' lawsuits over defects that were either disclosed in the seller's disclosure statement or uncovered during an inspection. Once a seller discloses, for example, that the home has "evidence of water in the basement," generally, it is the responsibility of the buyer to investigate further. The buyer can investigate by asking more questions of the seller and/or hiring a competent inspector. What the buyer should not do is assume that the problem is a small one and rely on the protection of a court when it turns out that what the seller meant was "evidence of water in the basement every time it rains."

Finally, keep in mind that the representations in a seller's disclosure statement are based upon the knowledge of the seller at the time the form was signed. A buyer may want to condition their offer on an updated seller's disclosure statement, particularly if significant time has passed since the form was signed. ●

RPAC HALL OF FAME



Paula Arndt
2019



Randy Caltrider
2018



Robert M. Campau
2017



Dan Coffey
2013



Chris J. Courtney
2014



Matthew Davis
2019



Heather Davis
2019



Debra DeAngelo
2022



Ted Edginton
2017



Stuart Elsea
2012



Maureen Francis
2021



Carol Frick Jones
2006



Yoshiko Fujimori
2017



Karen Greenwood
2018



Carol Griffith
2018



James Iodice
2020



Daniel Jaqua
2021



Alan Jeffries
2022



Tammy Kerr
2020



David Ledebuhr
2019



Sara Lipnitz
2017



Bill Martin
2008



Rodney Martin
2021



Gordon McCann
2015



John Meesseman
2019



William Milliken
2018



John North
2019



Thomas Paarberg
2020



Ann Peterson
2022



Kimberly Pontius
2020



Nanci J. Rands
2012



Rick J. Reardon
2017



Gary J. Reggish
2014



Cathy Sherman Bittrick
2018



Johnna Struck
2018



Brenda Lee Szlachta
2020

HALL OF FAME – LEVEL II



Mark Baker
2012



Chris Dean
2015



Ryan Eashoo
2019



Dan Elsea
2010



Rebecca Williamson
2019



Kathleen Wilson
2019



Jeff Young
2020



Debbie Zalewski
2020

HALL OF FAME – LEVEL IV



Beth M. Foley
2012



John G. McArdle
2014



Michel M. Metzner
2017



Robert E. Taylor
2012



Teri Spiro
2008



Pat Vredevoogd Combs
2006



Furhad Waquad
2010



Dale Zahn
2015

Year denotes entry into RPAC Hall of Fame with a lifetime investment total of at least \$25,000.

- Level II indicates a lifetime investment of at least \$50,000.
- Level III indicates a lifetime investment of at least \$75,000.
- Level IV indicates a lifetime investment of at least \$100,000.

2023 Michigan RPAC Major Investors

PLATINUM DIAMOND R

PLATINUM R



Michigan Realtors®



Greater Metropolitan Association of Realtors®



Aspire North Realtors®



Realcomp



West Michigan Lakeshore Association of Realtors®



Ryan Eashoo
East Central



Ann Peterson
North Oakland County



Teri Spiro
Greater Metropolitan

GOLDEN R



Mark Baker
Lewawee County



Dawn Bertani
Grosse Pointe



Nathan Boji
Greater Metropolitan



Luke Bouman
West Michigan Lakeshore



Randi Brandt
Greater Metropolitan



Chelsea Cain
Greater Metropolitan



Robert Campau
Michigan Realtors®



Pat Vredevoogd Combs
Greater Regional Alliance



Matt Davis
Battle Creek Area



Chris Dean
Greater Lansing



Debbie DeAngelo
Greater Metropolitan



Suzette Deaux
Greater Kalamazoo



Melissa Degen
Greater Metropolitan



Ted Edginton
Greater Metropolitan



Dan Elsea
Greater Metropolitan



Beth Foley
West Michigan Lakeshore



Karen Greenwood
Greater Metropolitan



Steve Grilley
West Michigan Lakeshore



Jason Heilig
Greater Metropolitan



Matt Hodges
Aspire North



James Iodice
Greater Metropolitan



Daniel Jaqua
Greater Kalamazoo



Alan Jeffries
Southwestern Michigan



Laurie Koelling
Greater Lansing



Roger Kopernik
Water Wonderland



Rick Linnell
Linnell & Associates



Sara Lipnitz
Greater Metropolitan



Jane Lowell
Greater Metropolitan



George Lucas
Southwestern Michigan



Carol Lukity
Greater Metropolitan



John McArdle
Greater Metropolitan



John Meeseman
Greater Metropolitan



Michel Metzner
Greater Regional Alliance



John Meyer
Greater Regional Alliance



Bill Milliken
Commercial Board



Mark Oegema
West Michigan Lakeshore



Dee Dee Ohara Blizard
Greater Metropolitan



Dr. E'toile O'Rear-Libbett
Greater Metropolitan



Jeff Packer
Greater Metropolitan



Gary J. Reggish
Greater Metropolitan



Natalie Rowe
Greater Kalamazoo



Elizabeth Sawicky
Upper Peninsula



Gary Scheitler
Aspire North



Sandra Smith
Ann Arbor Area



Steve Stockton
North Oakland County



Johnna Struck
Greater Metropolitan



Bob Taylor
Grosse Pointe



Carrie Vos
Greater Regional Alliance



Furhad Waquid
Greater Metropolitan



Katie Weaver
Greater Metropolitan



Brian Yaldeo
Greater Metropolitan



Dale Zahn
West Michigan Lakeshore

CRYSTAL R



Rich Adgate
West Central



Christopher Ayers
Greater Metropolitan



Sandra Bailey-Bristol
Greater Lansing



Michael Balsitis
Greater Regional Alliance



Austin Black
Greater Metropolitan



Al Block
Greater Metropolitan



Brenda Brosnan
North Oakland County



Randy Caltrider
America's Preferred Home Warranty



Greg Carlson
Greater Regional Alliance



Dan Coffey
Southwestern Michigan



Kathleen Coon
Greater Metropolitan



Christopher Coscarelli
Lenawee County



James Cristbrook
Greater Metropolitan



Heather Davis
West Michigan Lakeshore



Gail DeVries
West Michigan Lakeshore



Laura Durham
West Michigan Lakeshore



Tammy Dykema-Halloran
Greater Kalamazoo



Lisa Faber
Greater Kalamazoo



Sam Flamont
Aspire North



Debra Floor
Southwestern Michigan



Sandi Gentry
West Michigan Lakeshore



Carol Genzink
West Michigan Lakeshore



Christopher M. Germain
Upper Peninsula



Richard Harrison
Greater Metropolitan



Shawn Huston
Water Wonderland



Mary Anne Kennedy
Greater Metropolitan



Tammy Kerr
West Michigan Lakeshore



Dean Krepis
West Michigan Lakeshore



Todd Lands
Ann Arbor Area



Vicky Livernois
Greater Metropolitan



Lana Mangiapane
Greater Metropolitan



Rodney Martin
America's Preferred Home Warranty



Alex Milshteyn
Ann Arbor Area



Lisa Moore
Southeastern Border



Adam Paarberg
Greater Regional Alliance



Rebecca Perkins
West Michigan Lakeshore



Brad Platt
Century 21 Northland



Kim Pontius
Aspire North



John Postma
Greater Regional Alliance



Rick Reardon
Jackson Area



Tom Renkert
Ann Arbor Area



Frank Rhames
Lenawee County



Tom Rich
Greater Regional Alliance



Stacey Ruwe
West Michigan Lakeshore



Kimberly Ryan
West Michigan Lakeshore



Jeffrey Samotis
Water Wonderland



Jaye Sanders
Greater Metropolitan



Kellie Sergent
Aspire North



Britt Shearer
West Michigan Lakeshore



Gene Szpeinski
Greater Regional Alliance



Nora Tan
West Michigan Lakeshore



Penny Tarwacki
Southeastern Border



Constance Thomas
Greater Metropolitan



Carrie Toretta-Partello
Upper Peninsula



Rachael Veldkamp
Greater Regional Alliance



Steve Volkers
Greater Regional Alliance



Carol Wight-Barrett
Southwestern Michigan



Kathleen Wilson
Greater Metropolitan



Jerry Yatooma
Greater Metropolitan



Jeff Young
Realtors® Property Resource

2023 TRUSTEES

Chair



Anthony Schippa
Greater Metropolitan

Vice-Chair



Randi Brandt
Greater Metropolitan

Paul Bunce
Greater Regional Alliance

Chris Dean
Greater Lansing

Tammy Dykema-Halloran
Greater Kalamazoo

Jodie Franklin
Ann Arbor Area

Terry Frewen
Greater Lansing

Karen Greenwood
Greater Metropolitan

Charles Hoats
Commercial Alliance

Stephanie Jones
Upper Peninsula

Todd Lands
Ann Arbor Area

Ben Latocki
Jackson Area

Tom Long
Southeastern Border

Joi Luckadoo-Villa
Branch County

Stacey Ruwe
West Michigan Lakeshore

Linda Shephard
Saginaw

Steve Stockton
North Oakland County

Jeff Thornton
Greater Lansing

Carrie Vos
Greater Regional Alliance

Carol Wight-Barrett
Southwestern Michigan

Dale Zahn
Association Executives

STERLING R



James Addison
Grosse Pointe



Wendy Amstutz
Greater Metropolitan



Ryan Arnt
Southwestern Michigan



Angela Averill
Greater Lansing



Shannon Bagdonas
Southeastern Border



Sandra Baker
Livingston County



Robbin Barnes
Greater Metropolitan



Nicole Bartolomucci
Livingston County



Ashley Baynham
Saginaw



Doug Beiswanger
Jackson Area



Daniella Bell
Aspire North



Nancy Bierenga
West Michigan Lakeshore



Lisa Bohlen
Livingston County



Jon Bouck
Greater Regional Alliance



Mark Brace
Greater Regional Alliance



Kevin Brennan
Grosse Pointe



Chad Brown
Aspire North



Dana Brown
Jackson Area



Jack Brown
Ann Arbor Area



Todd Buckley
Livingston County



Paul Bunce
Greater Regional Alliance



Laurie Buys
Ann Arbor Area



Kathy Byerly
Jackson Area



Tricia Carlson
West Michigan Lakeshore



Deirdre Carroll
Aspire North



Michael Childress
Greater Regional Alliance



Deanna Coleman
Southeastern Border



Jennifer Conner
Greater Regional Alliance



Mike Cosgrove
Livingston County



Collin Cote
Jackson Area



Linda Crouse
West Michigan Lakeshore



Matt Dakoske
Aspire North



David Dalfino
Greater Metropolitan



Lisa Damron
Battelle Creek Area



Eric Dean
Greater Lansing



Dave DeBruyn
Greater Regional Alliance



Daniel DeCapua
Ann Arbor Area



Michael DeFauw
Grosse Pointe



Renee DeKroub
Livingston County



Robert DeVore
North Oakland County



Jonathan Dewindt
Greater Metropolitan



James Dewling
Livingston County



Sue Dickinson
Greater Lansing



Kelly Dix
Grosse Pointe



Kimberly Dunham
Greater Lansing



Angie Eliopoulos
West Michigan Lakeshore



Ron Ellison
Jackson Area



James Fett
West Michigan Lakeshore



Brooke Finlan
Greater Regional Alliance



Jeffrey Fletcher
Ann Arbor Area



Emily Ford
North Oakland County



Aaron Fox
Greater Lansing



Maureen Francis
Greater Metropolitan



Jodie Franklin
Ann Arbor Area



Cassie Frazee
Southwestern Michigan



Terry Frewen
Greater Lansing



Erin Galinac
Ann Arbor Area



Scott Galloway
Greater Metropolitan



Thomas Gaunt
North Oakland County



Jeanee Gilson
Lenawee County



Ryan Gordon
Upper Peninsula



Bryon Gough
Jackson Area



Jamie Grace
Aspire North



Beth Graham
Greater Lansing



Duke Gray
Greater Regional Alliance



Warren Greenwood
Greater Metropolitan



Carol Griffith
Livingston County



Scott Griffith
Livingston County



Lori Gryen
Greater Regional Alliance



Margie Haaxma
Water Wonderland



Ann Hammack
Southeastern Border



Ed Hansen
Greater Regional Alliance



Shannon Harner
Southeastern Border



Lori Haueter
Jackson Area



Alan Haynes
Southeastern Border



Robin Heath
Southeastern Border



Joann Heller
Southeastern Border



Dan Hendrick
West Michigan Lakeshore



Allison Henning
Greater Metropolitan



Tracey Hernly
Greater Lansing



Ryan Hesche
Greater Regional Alliance



Fred Hetherwick
Jackson Area



John Higgins
Greater Metropolitan



Monika Hillman
Southeastern Border



Cathleen Hoppough
Greater Regional Alliance



Darrell Hudiburgh
North Oakland County



Kevin Hultgren
Greater Metropolitan



Wendy Huston
Water Wonderland



Donald Hutchins
West Michigan Lakeshore



Angela Hyde
West Michigan Lakeshore



Diane Ives
Water Wonderland



Pat Jacobs
North Oakland County



Lori Jaglois
Grosse Pointe



Sherlynn James
Greater Regional Alliance



Luke Jeffries
Southwestern Michigan



Alex Jeffries
Greater Kalamazoo



Devon Johnson
Southwestern Michigan



Stephanie Jones
Upper Peninsula



Meriem Kadi
Greater Metropolitan



Cindy Kahn
Greater Metropolitan



Francine Kanalos
Grosse Pointe



Tim Katerberg
Greater Regional Alliance



Kris Keegstra
Greater Regional Alliance



Jonathon Keller
Ann Arbor Area



Michael Kendall
Jackson Area



Don King
Greater Regional Alliance



Douglas Klaasen
West Michigan Lakeshore



David Klaf
Grosse Pointe



Brian Klingel
West Michigan Lakeshore



Aris Knitter
West Michigan Lakeshore



Benjamin Kono
Jackson Area



Mary Kopicki
Greater Metropolitan



Dennis Kozak
Greater Metropolitan



Alicia Kramer
West Michigan Lakeshore



Kim Kurtz
Jackson Area



Michael Lamb
Greater Regional Alliance



Jack Lane
Aspire North

STERLING R



Gary Langlois
West Michigan Lakeshore



Ben Latocki
Jackson Area



Lisa Lightfoot
West Central



Tom Long
Southeastern Border



Meagan Luce
Aspire North



Robert Mack
Commercial Board



John MacLeod
Livingston County



Colleen Maillette
Bay County



Rachel Major
Greater Regional Alliance



Renee Malburg
Mason Oceana Manistee



Megan Malczewski
Commercial Board



Shadia Martini
North Oakland County



Lynn Mattila
East Central



Cindy Maurer
West Michigan Lakeshore



Kristie McCleary
Southeastern Border



Duffy McClelland
Greater Regional Alliance



Marianne McCreary
Livingston County



Joe McVally
West Central



Connor Miller
Aspire North



Bryant Mitchell
Greater Regional Alliance



Susan Mohlman
Jackson



Erick Monzo
Grosse Pointe



Lynne Moon
Aspire North



Lynn Moore
Saginaw



Toni Morrison
Aspire North



Judy Moster
West Michigan Lakeshore



Sharon Mueller
Ann Arbor Area



Kendan Myers
Southeastern Border



Ingrid Nelson
Greater Regional Alliance



Erika Nita
Aspire North



Brian Ozburn
Greater Lansing



Tom Paarlberg
Greater Regional Alliance



Jordan Painter
Greater Regional Alliance



Michele Papatheodore
East Central



Linda Pell
Greater Regional Alliance



Walter Porschbacher IV
Greater Regional Alliance



Bert Peters
Southwestern Michigan



Jacob Peterson
Greater Regional Alliance



Beth Ping
Ann Arbor Area



Robin Pompey
Greater Kalamazoo



Ann Porter
Aspire North



Beth Pressler
Grosse Pointe



Louis Price
Southwestern Michigan



Holly Rachel
North Oakland County



Evidza Ramaj
North Oakland County



Marcia Randall
Lenawee County



Willie Ray
East Central



Julie Rietberg
Greater Regional Alliance



Julie Rockwell
Greater Regional Alliance



Amanda Rogers
Greater Regional Alliance



Eric Ropp
Jackson Area



Tracy Rose
Ann Arbor Area



Lisa Rossi-Brett
Aspire North



Dave Ruwe
West Michigan Lakeshore



Maryann Ryan
Ann Arbor Area



Wendy Ryder
West Michigan Lakeshore



Jason Sakis
North Oakland County



Ashley Schaefer
Greater Regional Alliance



Tony Schippa
Greater Metropolitan



Cheryl Schlehuber
Water Wonderland



Shelley Schoenher
Greater Metropolitan



Jasen Schrock
Century 21 Affiliated



Rustin Scott
Greater Regional Alliance



Ryan Servatius
Southwestern Michigan



Kristine Shacklette
Aspire North



Ashley Shaw
West Michigan Lakeshore



Karen Shelton
Southeastern Border



Linda Shepard
Saginaw



Jenni Shepard-Moore
Lenawee County



Theresa Shrader
Greater Metropolitan



Marcia Siddall
Southeastern Border



Abby Sierzputowski
Aspire North



Brooke Sines
Greater Regional Alliance



Jodi Smith
Greater Regional Alliance



Taressa Sprick
West Michigan Lakeshore



Louise St. Amour
West Michigan Lakeshore



Amanda Stickney
Greater Regional Alliance



Leonard Stickney
Greater Regional Alliance



Robin Stressman
Central Michigan



Steve Stressman
Central Michigan



Lakshmi Subbiah
Southeastern Border



David Taljonick
East Central



Melissa Tee
Jackson Area



Michelle Teitsma
West Michigan Lakeshore



Lisa Thomas
Greater Regional Alliance



Kim Thompson
East Central



Jeff Thornton
Greater Lansing



Tim Todd
Greater Regional Alliance



Gino Tozzi
Grosse Pointe



Sheila Turner
Greater Metropolitan



Dawn Van Kampen
West Michigan Lakeshore



Mike VanderWoude
Greater Regional Alliance



Robin Vilter
Aspire North



Suzanne Voltz
Aspire North



Todd Waller
Ann Arbor Area



Eric Walstrom
Greater Metropolitan



Brad Ward
Michigan Realtors*



Diana Watches
Ann Arbor Area



Mark Webberly
Greater Metropolitan



Corey Welch
Southeastern Border



Amy Jo Weller
Greater Regional Alliance



Ken Wells
Saginaw



Scott West
Greater Regional Alliance



Brian Westrin
Michigan Realtors*



Wanda Williams
Greater Lansing



Rebecca Williamson
Greater Metropolitan



Lisa Wright-Moore
Southwestern Michigan



Don Wurtzel
Ann Arbor Area



Jennifer Yarch
Midland



Jon Zickert
Aspire North



Michigan Realtors® Political Action Committee (RPAC) is the premier grassroots network promoting the real estate industry and the great American tradition of private property ownership. Investors in RPAC work together, statewide, impacting ballot proposals that affect our industry and promoting candidates for office that understand our business interests. Realtors® are a force with RPAC, effectively advocating for less burdensome regulation of our business and strong support of private property rights at the local, state, and federal levels.

THANK YOU FOR YOUR INVESTMENT

CORPORATE INVESTORS

Golden R

Commercial Alliance of Realtors®
 Greater Regional Alliance of Realtors®
 Jackson Area Association of Realtors®
 Northern Great Lakes Realtors® MLS
 North Oakland County Board of Realtors®

Crystal R

Greater Kalamazoo Association of Realtors®
 Greater Lansing Association of Realtors®
 Hillsdale County Board of Realtors®
 Mason Oceana Manistee Board of Realtors®
 Northeastern Michigan Board of Realtors®
 Real Estate Information System of Southwestern Michigan
 Southwestern Michigan Association of Realtors®
 Upper Peninsula Association of Realtors®

Sterling R

Battle Creek Area Association of Realtors®
 Central Michigan Association of Realtors®
 Clare Gladwin Board of Realtors®
 Commercial Board of Realtors®
 Delta County MLS
 Linnell & Associates, PLLC
 North Central MLS
 Southeastern Boarder Association of Realtors®
 WCR I-275 Corridor Network
 WCR Birmingham Bloomfield Network
 WCR Lake Pointe Network
 WCR Lakeshore Network
 WCR Michigan Network
 WCR Rochester Network
 West Central Association of Realtors®

NAR PRESIDENT'S CIRCLE

Wendy Amstutz
 Greater Metropolitan

Mark Baker
 Lenawee County

Dawn Bertani
 Grosse Pointe

Chelsea Cain
 Greater Metropolitan

Robert M. Campau
 Michigan Realtors®

Heather Davis
 West Michigan Lakeshore

Chris Dean
 Greater Lansing

Debra DeAngelo
 Greater Metropolitan

Melissa Degen
 Greater Metropolitan

Renee DeKroub
 Livingston County

Ryan Eashoo
 East Central

Daniel Elsea
 Greater Metropolitan

Debra Floor
 Southwestern Michigan

Beth Foley
 West Michigan Lakeshore

Karen Greenwood
 Greater Metropolitan

Carol Griffith
 Livingston County

James Iodice
 Greater Metropolitan

Daniel Jaqua
 Greater Kalamazoo

Alan Jeffries
 Southwestern Michigan

Laurie Koelling
 Greater Lansing

Roger Kopernik
 Water Wonderland

Maria Kopicki
 Greater Metropolitan

Richard Linnell
 Linnell & Associates

Sara Lipnitz
 Greater Metropolitan

Jane Lowell
 Greater Metropolitan

George Lucas
 Southwestern Michigan

Rodney Martin
 America's Preferred Home Warranty

John McArdle
 Greater Metropolitan

Michel Metzner
 Greater Regional Alliance

Bill Milliken
 Commercial Board

Alex Milshteyn
 Ann Arbor Area

Dee Dee Ohara Blizard
 Greater Metropolitan

Dr. E'toile O'Rear-Libbett
 Greater Metropolitan

Rick Reardon
 Jackson Area

Gary J. Reggish
 Greater Metropolitan

Stacey Ruwe
 West Michigan Lakeshore

Sandra Smith
 Ann Arbor Area

Theresa Spiro
 Greater Metropolitan

Johnna Struck
 Greater Metropolitan

Robert Taylor
 Grosse Pointe

Carrie Vos
 Greater Regional Alliance

Furhad Waquad
 Greater Metropolitan

Carol Wight-Barrett
 Southwestern Michigan

Jeff Young
 Realtors® Property Resource

All members that made a 2023 investment, including those at the Gold Circle, Silver Circle, and Century Circle levels, are recognized at www.mirealtors.com/Advocacy-Initiatives

This tribute is intended for viewing only by members. This is not a public solicitation.

A Matter of Trust



Defined as: *“Firm belief in someone or something’s reliability, truth, ability, or strength”*, trust is not something we take for granted.

As Realcomp celebrates its 30th anniversary this year, we express our gratitude for your continued confidence.

We know trust is *earned* over time, not given. Our commitment to retain yours remains unwavering.



Realcomp II Ltd. Real Data. Real Time. Real People.

Realcomp.MoveInMichigan.com | www.MoveInMichigan.com | www.facebook.com/realcompimls | twitter.com/realcompmls

Phone: 866.553.3003