

OSINT ANALYTIC ASSESSMENT

Goldtex Apartments - Post Goldtex LP - Greystar

Open-Source Litigation Intelligence for Attorney Review

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Classification	UNCLASSIFIED // OPEN SOURCE / PUBLIC RECORD
Analyst	Independent open-source research
Intended consumer	Pennsylvania-licensed counsel retained by affected tenant(s) of 315 N 12th Street, Philadelphia
Subject property	Goldtex Apartments, 315-23 N 12th St, Philadelphia, PA 19107 (OPA parcel 881519440; 163 units, 10 stories)
Subject entities	Post Goldtex LP (owner of record); Greystar Management Services, LLC / parent GREP General Partner, LLC (manager corporate chain)
Tradecraft framework	ICD 203 Analytic Standards (9 tradecraft elements); Admiralty Code (NATO STANAG 2511) for source grading; IC standard confidence lexicon
Distribution	Attorney-client work product on delivery. Derivative use subject to counsel direction.

Analytic Notice

This assessment was produced exclusively from open, publicly available sources — government portals, federal and state court dockets, federal and state agency press releases, public WHOIS/DNS records, and publicly-hosted corporate disclosures. No subscription access, no credentialed access, no private-database records, and no breach-aggregator or dark-web sources were used. Every factual claim is traceable to a primary source cited in Appendix A.

This product is an analytic assessment, not legal advice. Causes of action, class certification strategy, statute-of-limitations analysis, and interaction with already-resolved federal and multi-state settlements are matters for Pennsylvania-licensed counsel. Findings are stated with explicit confidence levels (ICD 203 Tradecraft Standard #2) and separated from assumptions (Standard #3).

Plain-English summary for the consumer. The owner entity of a 163-unit Philadelphia apartment building is operating without a valid rental license, while the building sits under two active UNFIT STRUCTURE designations and fire-alarm/suppression certifications have been out of compliance since last August. The property manager settled federal and nine-state antitrust and consumer-protection actions in 2025 covering other jurisdictions; Pennsylvania was not among them. Detailed findings, source grades, and residual

uncertainties follow.

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1. Key Judgments (Bottom Line Up Front)

The following judgments are the analyst's assessed conclusions from the collection described in §4 and fully traceable to the sources cataloged in Appendix A. Each is stated with an explicit confidence level calibrated per §3.3. Judgments are analytic — they are not findings of fact by a court.

KJ-1. HIGH CONFIDENCE

Post Goldtex LP — the owner-of-record entity for Goldtex Apartments — is **almost certainly** operating the 163-unit building without a valid Philadelphia Residential Dwellings rental license. License #602204 expired 2026-02-28 per the Philadelphia Department of Licenses & Inspections' own public record, and no renewal is reflected in the same system as of the collection date. Operating duration without license is approximately 55 days as of 2026-04-24.

Sources: Philly Carto business_licenses SQL [A1]. See F-01.

KJ-2. HIGH CONFIDENCE

Goldtex Apartments **almost certainly** has at least 13 currently open Philadelphia L&I violations, including two UNFIT STRUCTURE designations (PM15-109.1), multiple in-heating-season Heating Residential Temp violations (PM15-602.2 / 602.3) naming specific occupied units, and three fire-safety violations open since 23 August 2025.

Sources: Philly Carto violations table [A1]; five Eclipse-hosted NOV PDFs [A1]. See F-02 through F-06.

KJ-3. MODERATE CONFIDENCE

Goldtex **very likely** has the highest count of currently-open L&I violations of any property in the Post Brothers Philadelphia portfolio. This is a quantitative comparison against 20+ identified Post-owned parcels; the single-day snapshot nature of the query limits it to "very likely" rather than "almost certainly."

Sources: Philly Carto portfolio query [A1]. See F-03.

KJ-4. MODERATE CONFIDENCE

A Pennsylvania class action grounded in (a) the PA Unfair Trade Practices & Consumer Protection Law (UTPCPL, 73 P.S. §201-1 et seq.) and (b) the PA warranty of habitability (*Pugh v. Holmes*, 486 Pa. 272 (1979)) is **likely** not precluded by the three resolved 2025 Greystar enforcement actions (FTC/Colorado \$24M; DOJ RealPage consent decree; nine-state AG \$7M). Pennsylvania is independently confirmed as not one of the nine states in the AG coalition. Counsel must verify against the specific release language and the October 2025 \$141M private class settlement.

Sources: nine-state AG coalition membership independently verified across six state AG releases [B1]; FTC press release [A1]; DOJ proposed consent decree [A1]. See F-09, F-10.

KJ-5. LOW CONFIDENCE

The Post Brothers Philadelphia portfolio is organized as property-specific single-purpose LLCs and LPs that share a common mailing address block (PO Box 37014 / 1 Winding Drive, Suite 200) and a common named contact (Michael Pestronk). This pattern **may** support alter-ego / instrumentality theories under PA law for claims against the owner-of-record SPV, but supporting the theory as a matter of law requires facts not established in open source alone.

Sources: OPA parcel data aggregated across 20+ entities [A1]; rental license records [A1]. Veil-piercing analysis is for counsel.

KJ-6. MODERATE CONFIDENCE

The conduct the FTC and State of Colorado settled Greystar against in December 2025 — non-disclosure of mandatory fees and conditions at the advertised-rent / leasing-tour stage — is, on the open-source record, **likely** present at this property in at least one documented instance (pregnant prospective tenant told at the leasing office on 2026-04-14 that the AC failure had not been disclosed during their building tour). Counsel should evaluate whether that settlement's release language reaches PA conduct.

Sources: FTC December 2025 press release [A1]; contemporaneous tenant documentation of 2026-04-14 leasing-office encounter (consumer document, not part of this open-source product but provided to counsel separately) [C2]. See F-09.

What changed from v1.0. v1.0 of this assessment (23 April 2026) contained the same underlying collection but did not apply ICD 203 tradecraft structure, did not grade sources on the Admiralty scale, did not separate facts from assessments explicitly, and did not state alternative hypotheses or intelligence gaps as stand-alone sections. No factual finding has been retracted; one has been refined (KJ-3: downgraded from implied certainty to "very likely" given single-day snapshot dependency). The October 2025 private class settlement of \$141M across 26 landlords including Greystar is new to v2.0.

2. Scope & Intelligence Requirements

2.1 Scope

This assessment is limited to open-source information relevant to potential civil litigation against the owner and manager of Goldtex Apartments. It is a background and landscape product; it is not a substitute for formal discovery.

In scope:

(i) The subject property's parcel, license, permit, and L&I violation record; (ii) the owner-of-record entity Post Goldtex LP and its related portfolio-level Philadelphia entities; (iii) the manager entity Greystar and its parent corporate chain as disclosed in federal court filings; (iv) existing and resolved federal and state enforcement and private litigation against either entity; (v) preclusion posture for Pennsylvania-law claims; (vi) intelligence gaps and recommended follow-on collection.

Out of scope:

(i) Any individual tenant's personal facts (those are addressed in the separate retaliation documentation product); (ii) criminal matters not bearing on the owner/manager entities; (iii) commentary on the merits of existing litigation outside its preclusion implications; (iv) recommendations on causes of action, which are for counsel; (v) any non-public or credentialed data source.

2.2 Priority Intelligence Requirements (PIRs)

The collection was structured around the following PIRs:

PIR	Question	Addressed in
1	Is the owner entity operating the building in compliance with Philadelphia rental licensure?	F-01
2	What is the current L&I compliance posture of the property, at what severity, and for how long?	F-02, F-04, F-05, F-06
3	How does this property compare to the rest of the owner's Philadelphia portfolio?	F-03, F-07
4	What is the corporate structure of the manager, and what entity is the right defendant?	F-08
5	What legal exposure has the manager already resolved, and what is preserved for a PA action?	F-09, F-10
6	What use-permit and operational history is relevant to any disclosure-based or zoning-overlapping claim?	F-11, F-12
7	What active federal litigation might bear on strategy?	F-13

3. Methodology

3.1 Collection framework

Collection proceeded through five tiers, each with distinct reliability properties:

Tier	Sources	Typical Admiralty
1	Primary government portals (Philadelphia OPA/AIS, Philly Carto SQL tables, L&I Eclipse, federal-court PACER/CourtListener/RECAP, federal and state AG press releases)	A1 – A2
2	Corporate disclosures made on the public record (Rule 7.1 corporate disclosure statements in federal dockets; rental license filings; permit applications)	A1 – B2
3	Public commercial registries and authoritative directories (IANA/WHOIS, certificate transparency logs, DNS)	B1 – B2
4	Reputable secondary reporting (Reuters, ProPublica, Courthouse News, Multifamily Dive, major state/metro press)	B2 – C2
5	Non-authoritative directories and commercial aggregators (OpenCorporates free tier, secondary database republishers)	C2 – C3

3.2 Source evaluation — Admiralty Code

Each source is graded on two independent axes per NATO STANAG 2511 (the "Admiralty Code"): a **letter** for the reliability of the source itself, and a **number** for the credibility of the specific piece of information drawn from it. The two combine into a two-character rating such as [A1] — the strongest available.

Reliability (source)		Credibility (information)	
A	Completely reliable — known history of authenticity	1	Confirmed by other independent sources
B	Usually reliable — minor doubts only	2	Probably true
C	Fairly reliable — doubts possible	3	Possibly true
D	Not usually reliable — significant doubts	4	Doubtful
E	Unreliable — history of problems	5	Improbable
F	Cannot be judged	6	Cannot be judged

3.3 Analytic confidence lexicon

Confidence levels describe the analyst's degree of certainty in a judgment given the quality and convergence of the underlying sources. They are *not* probability estimates — those are expressed separately through the likelihood terms in §3.4.

Level	Meaning
HIGH	Multiple independent high-reliability sources converge. Strong analytic foundation. Judgment unlikely to change absent major new information.

Level	Meaning
MODERATE	Credible sourcing with gaps, a single source, or material interpretation required. Judgment could change with additional collection.
LOW	Scant, fragmented, or questionable sources. Significant inferential leap. Judgment is tentative and should be treated as a working hypothesis.

3.4 Likelihood terms

Probability of a stated event or condition is expressed using the standard IC lexicon. These terms are distinct from confidence (§3.3): a judgment can be stated with HIGH confidence that an event is "unlikely," and vice versa.

Term	Range (approx.)
Almost certainly	≥ 95 %
Very likely	80 – 95 %
Likely	55 – 80 %
Roughly even chance	45 – 55 %
Unlikely	20 – 45 %
Very unlikely	5 – 20 %
Almost no chance	≤ 5 %

3.5 Analysis of Alternatives protocol

For every judgment that rests on interpretation rather than direct documentary evidence, at least one alternative hypothesis was specified and actively evaluated against the same record, consistent with ICD 203 Tradecraft Standard #4 ("Incorporates analysis of alternatives"). The alternative hypotheses considered, and the reason each was retained or rejected, are documented in §5. Where an alternative cannot be ruled out on open source alone, the residual uncertainty is flagged in the confidence level and in §6 (Intelligence Gaps).

3.6 Legal and ethical compliance

Collection adhered to the OSINT Foundation's 2024 Professional Principles statement and applicable federal, Pennsylvania, and Philadelphia law. Specifically: no credentialed or session-protected systems were accessed; no breach-aggregator, dark-web, or stolen-data sources were used; no surreptitious recording or impersonation occurred; all queries against government portals used publicly documented interfaces (Philly Carto SQL, AIS REST, Eclipse public download URLs, CourtListener REST API). Individual privacy was considered: this product names corporate entities and individuals who appear on public rental licenses, permits, court filings, or official press releases — not non-public individuals.

3.7 Chain of custody and preservation

Every primary-source URL cited in Appendix A was reachable at the collection time stamped in that appendix. Portals with transient rendering (e.g., PhilaDox, PA Department of State entity search, UJSWeb) were noted as not-retrieved in §6 rather than substituted with cached or third-party copies. No retrieved page was altered. The L&I Eclipse NOV PDFs are hosted by the City of Philadelphia at publicly addressable URLs and may be independently verified at any time; their content as observed on the collection date is summarized in F-02.

4. Analytic Findings

Each finding below carries a unique identifier (F-NN). The finding statement is tagged by evidentiary type: **FACT** for items directly observable in the cited primary source; **ASSESSMENT** for analytic judgments; **ASSUMPTION** for operating premises that have not been tested against a primary source and should be treated as such. Source ratings are inline in [letter-number] form per §3.2.

F-01 Rental license status — Post Goldtex LP

HIGH CONFIDENCE FACT

Statement. Philadelphia Residential Dwellings rental license #602204 (Post Goldtex LP, 163 units) is marked **Expired** in the Philadelphia business-licenses registry, with an expiration date of 2026-02-28. No subsequent renewal is reflected in the same registry as of the collection date (2026-04-24).

Evidence	Source [rating]
License #602204 status = "Expired"; expiration 2026-02-28; 163 units; initial issue 2013-08-12; last issuance 2025-02-06.	Philly Carto <i>business_licenses</i> [A1]
All other Post Brothers' Philadelphia rental licenses checked (Rittenhouse Hill, 4701 Pine, One Thousand One) show Active status with future expirations, ruling out a portfolio-wide renewal pause.	Same portal [A1]

Analysis. Philadelphia Code § PM-102.1 (and related) provides that rental properties may not be operated without an active license. The fact of non-renewal is established on the primary-source public record. The *legal consequence* of that fact (per-unit / per-day exposure, interaction with Pennsylvania's 68 Pa.C.S. §250.511a rent-retention statute and the PA UTPCPL) is a question for counsel.

Implication. Operating duration without license is approximately 55 days as of the collection date and growing at one day per day. The longer the state of non-compliance persists, the wider any rent-refund / disgorgement window becomes — and the stronger the inference that the condition is not a clerical or processing issue (see §5, A-1).

F-02 Open L&I; violations at parcel 881519440

HIGH CONFIDENCE FACT

Statement. Thirteen (13) L&I violation line-items at the parcel are currently in OPEN status, spanning five separate case numbers and eight distinct code subsections. Fourteen (14) cases are in "In Violation" status. Lifetime line-items at the parcel number one hundred eighteen (118).

Evidence	Source [rating]
Full violation record pulled by SQL query against Philly Carto's <i>violations</i> table filtered on parcel 881519440.	Philly Carto SQL [A1]
Unit-level detail (Units 202, 316 floors 2/3/5/6, 612, 1018, and building-wide fire alarm) extracted from five publicly-hosted L&I Notices of Violation on eclipse.phila.gov .	L&I Eclipse NOV PDFs [A1]
Standard statutory fines cited in each NOV: \$300 per violation per day past correction deadline uncured.	Philadelphia Code §A-601 [A1]

Analysis. The distribution matters: the open violations are not concentrated in one subsystem (e.g., hallway cosmetics). They span mechanical / HVAC (PM15-603.1, 602.2, 602.3), life-safety (UNFIT STRUCTURE, PM15-109.1), and fire-safety (F-901.6, 901.6.3, 901.6.4). Individual units named in the NOVs include 202, 316 (four floors), 612, and 1018 — indicating the problem is not isolated to a single unit.

Implication. For class-scoping purposes this matters: a habitability class does not depend on building-wide uniformity of defect so long as the code sections and time windows overlap across unit members.

F-03 Goldtex has the highest open-violation count in the Post Brothers Philadelphia portfolio

CONFIDENCE **MODERATE**
ASSESSMENT

Statement. Compared across the twenty-plus Post Brothers Philadelphia parcels identified in this collection, Goldtex holds the largest number of currently open L&I violation line-items.

Evidence	Source [rating]
Portfolio query (lifetime and open violations) against Philly Carto: Goldtex 118 lifetime / 13 open; Rittenhouse Hill 168 lifetime / 2 open; 4701 Pine 88 / 0; One Thousand One 71 / 0; others all lower open counts.	Philly Carto SQL [A1]

Analysis. The reversed pattern (Rittenhouse Hill has more lifetime but fewer open violations) argues the Goldtex open count is not a function of building age or size — it reflects current operational state. This is a single-day snapshot and therefore stated at MODERATE rather than HIGH confidence (see §5, A-2).

Implication. Treats Goldtex as the Post Brothers Philadelphia outlier for compliance purposes. Relevant for selecting the most defensible anchor property in any portfolio-scope action.

F-04 Fire-safety compliance lapse since August 2025

HIGH CONFIDENCE FACT

Statement. Three fire-safety violations have been OPEN at the parcel since 2025-08-23 — correct-by date was 2025-09-26, passed roughly eight months ago as of the collection date. The violations are: F-901.6 (Fire — Inspection, Testing & Maintenance); F-901.6.3 (Fire — Records); F-901.6.4 (Fire — Periodic Testing). The NOV (case CF-2025-089778, authored by Fire Safety Central East District, 667 N Broad St) cites failure to restore the fire alarm panel to normal status and missing current fire-alarm and fire-suppression system certifications.

Evidence	Source [rating]
Eclipse NOV for case CF-2025-089778 downloaded from eclipse.phila.gov; cites F-901.6, F-901.6.3, F-901.6.4; correct-by 9/26/2025; open as of 4/24/2026.	L&I Eclipse [A1]

Analysis. The gap between the original correct-by date and the collection date, combined with the continued OPEN status in Carto, is itself a primary-source observation of sustained non-compliance. A reasonable alternative hypothesis — the NOVs have been abated but the record not updated — is evaluated and rejected in §5 (A-5).

Implication. Fire-safety compliance is a predicate requirement for ongoing residential operation of a 163-unit high-rise. This finding is directly relevant to any tenant claim that depends on the building's operating posture.

F-05 Two active UNFIT STRUCTURE designations

HIGH CONFIDENCE FACT

Statement. Two separate OPEN violation line-items at the parcel cite Philadelphia Property Maintenance Code §PM15-109.1, "Unfit Structure," both dated 2026-02-11 under different case numbers (CF-2026-012614 and CF-2026-012633).

Evidence	Source [rating]
Philly Carto violations table filtered for PM15-109.1 at parcel 881519440.	Philly Carto SQL [A1]

Analysis. The appearance of two separate UNFIT STRUCTURE line-items on the same day under different case numbers is consistent with L&I identifying multiple discrete unfit units or systems at the inspection. The open-source record does not specify which units or systems (see §6 for the intelligence gap).

Implication. PM15-109.1 is the most severe residential code designation short of evacuation order and is directly probative of habitability. The question of *which* units were deemed unfit is a priority follow-on collection item (Appendix §11 of v1.0; §7 of this report).

F-06 In-season heating violations

HIGH CONFIDENCE FACT

Statement. Four OPEN violation line-items at the parcel cite Philadelphia Property Maintenance Code §PM15-602.2 or §PM15-602.3 (Heating — Residential and Heating — Residential Temperature) between 2026-02-04 and 2026-02-11. These violations fall within the Philadelphia statutory heating season (October – April).

Evidence	Source [rating]
Philly Carto violations table for PM15-602.2 / 602.3 at the parcel.	Philly Carto SQL [A1]
NOV CF-2026-011056 (2026-02-07) names "Unit 316, floors 2, 3, 5, 6" as the location; cites the October-through-April statutory requirement. NOV CF-2026-010311 (2026-02-04) names Unit 202.	L&I Eclipse [A1]

Analysis. The naming of four separate floors within a single NOV establishes a multi-floor defect rather than an isolated unit issue. The in-season timing matters because Philadelphia's minimum-temperature regulation is statutory during this window.

Implication. Multi-floor, in-season heating defect directly supports a habitability claim theory and is a defensible factual predicate for a class spanning the named floors.

F-07 Post Brothers Philadelphia SPV structure

MODERATE
CONFIDENCE ASSESSMENT

Statement. Post Brothers operates its Philadelphia portfolio through a set of property-specific single-purpose LLCs and LPs (Post Goldtex LP, Post Rittenhouse Hill LP, Post 4701 Pine Street LP, Post 260 Property Owner LLC, Piazza Partners I LP, and others), all sharing a common mailing address block (PO Box 37014 / 1 Winding Drive, Suite 200) and a common named contact (Michael Pestronk) on rental licenses.

Evidence	Source [rating]
OPA parcel records for each of 20+ Post-named entities returned the same mailing address block.	Philly Carto <i>opa_properties_public</i> SQL [A1]

Evidence	Source [rating]
Rental license records for Goldtex, Rittenhouse Hill, 4701 Pine, and One Thousand One all list business address 1 Winding Drive Suite 200 and a named contact of Michael Pestronk.	Philly Carto business_licenses [A1]
NLRB historical d/b/a "Post Brother's Estates d/b/a Post Brother's Apartments" (cases 04-CA-105691, 04-CA-132742).	NLRB case records [A1]

Analysis. Shared mailing address and common contact are classic structural elements in a Pennsylvania alter-ego analysis. They are a *necessary* but not *sufficient* foundation — the ultimate veil-piercing inquiry also looks to capital adequacy, separateness of decision-making, and observance of corporate formalities, which are not established by open-source alone. The confidence level is MODERATE because the legal operability of the pattern has not been tested.

Implication. Counsel should evaluate whether the shared-address / shared-contact pattern, combined with any discoverable capital-flow or management-control facts, supports reaching Post Brothers Holdings, LLC or individual principals as defendants in an action nominally against Post Goldtex LP.

F-08 Greystar corporate chain

HIGH CONFIDENCE FACT

Statement. Greystar's corporate chain, per Greystar's own Rule 7.1 disclosure filed in federal court, ascends from the named defendant through Greystar Real Estate Partners, LLC to the ultimate parent GREP General Partner, LLC. Related operating entities appearing in federal captions include Greystar Management Services, LLC; Greystar Management Services, L.P.; GREP Southeast, LLC; and Ocean 650/Greystar Management Services, LP.

Evidence	Source [rating]
ECF No. 10 in <i>Mark Anthony Hall v. Greystar LLC / Greystar Management Services, LLC</i> , E.D.N.C. 5:25-cv-00740, filed 2026-03-02 — Defendant's Financial Disclosure Statement.	CourtListener RECAP [A1]
Additional entity names captured from captions in <i>Wu v. Greystar Real Estate Partners, LLC</i> (S.D. Cal. 3:25-cv-01090); <i>Rice v. Greystar Management Services LP</i> (W.D. Wash. 2:26-cv-00140); <i>Dlin v. Greystar Management Services, L.P.</i> (D. Md. 8:25-cv-01215); <i>Rodriguez v. Greystar Management Services, LLC</i> (W.D.N.C. 3:26-cv-00126); <i>Srado v. U.S. REIF / Greystar / GREP Southeast</i> (S.D. Fla. 9:26-cv-80213); <i>Glenn v. Ocean 650/Graystar</i> (D. Mass. 1:26-cv-10252).	CourtListener docket search [A1]
Greystar's Philadelphia rental-license footprint does not include Goldtex (license #935993 covers only "The Clark," 4519-45 Chestnut St). Per Philadelphia practice, the owner holds the residential rental license, not the manager. Post Goldtex LP's license record includes field "ownerismanagingagentinphilly = No," consistent with an owner-declared managing agent.	Philly Carto business_licenses [A1]

Analysis. Rule 7.1 disclosure by the party itself is the strongest available corporate-structure evidence short of formal discovery. The multiplicity of operating-entity names across jurisdictions indicates that any complaint must carefully identify the correct contracting and operating entity for the PA conduct at issue.

Implication. For any PA action, the likely primary named entity on the manager-side is Greystar Management Services, LLC (the defendant in the FTC/Colorado and DOJ/state-AG enforcement actions), with the Rule 7.1 chain preserved for reach-through allegations.

F-09 Resolved 2025 Greystar enforcement landscape

HIGH CONFIDENCE FACT

Statement. Four distinct resolved (or pending-approval) 2025 actions against Greystar or entities including Greystar have been identified in the public record: (a) FTC + State of Colorado, \$24M settlement (Dec 2025) for deceptive omission of mandatory fees from advertised rent; (b) U.S. DOJ + states, consent decree (Aug 2025, MDNC) prohibiting Greystar's use of anticompetitive pricing algorithms including RealPage; (c) Nine-state AG coalition, \$7M settlement (Nov 2025) parallel to the DOJ action; (d) Private class action by tenants, \$141M global resolution across 26 landlords including Greystar (Oct 2025).

Evidence	Source [rating]
FTC press release, 2 Dec 2025.	ftc.gov [A1]
DOJ OPA press release, Aug 2025; proposed consent decree filed in MDNC, approved by Judge Osteen.	justice.gov [A1]; CourtListener [A1]
California AG press release, 19 Nov 2025; parallel releases from AGs of Minnesota, North Carolina, Oregon, Massachusetts.	Multiple AG sites [B1]
October 2025 tenant class-action settlement: \$141M across 26 landlords (reporting in Multifamily Dive, NC-DOJ, Mass Landlords).	Secondary reporting [B2]; primary filings MDNC [A1]

Analysis. The three government actions resolve specific sets of claims within specific jurisdictions. The private class-action resolution covers claims tied specifically to the RealPage pricing algorithm. None appears to reach PA habitability, license-compliance, or non-algorithmic consumer-protection claims on its face. The October 2025 private-class release language and the FTC/Colorado release language are both items counsel must examine directly rather than rely on this assessment to summarize.

Implication. The enforcement landscape confirms a pattern-and-practice record at the manager-entity level that a PA plaintiff may offer as admissible pattern evidence, subject to Rule 404(b) analysis, for purposes of punitive-damages framing or intent under UTPCPL.

F-10 Pennsylvania posture vs. resolved actions

HIGH CONFIDENCE ASSESSMENT

Statement. Pennsylvania is independently confirmed not to be among the nine states in the 2025 AG coalition that settled with Greystar. Those nine states are: California, Colorado, Connecticut, Illinois, Massachusetts, Minnesota, North Carolina, Oregon, Tennessee.

Evidence	Source [rating]
Each of six state AG press releases lists the identical nine-state membership; PA is not listed in any.	AG press releases from CA, MN, NC, OR, MA [B1]

Analysis. Non-membership in the coalition means PA-law claims (UTPCPL, warranty of habitability, Philadelphia Code licensure, et al.) are *likely* not released by the nine-state settlement. The FTC/Colorado \$24M consumer-refund program targets Colorado consumers and release language counsel must inspect; the DOJ consent decree does not include tenant damages. The October 2025 private class is the instrument

most likely to have a broad release — counsel to evaluate.

Implication. Supports KJ-4: a PA-specific action targeting habitability, licensure, and non-algorithmic deceptive practices is likely not preempted by the federal and multi-state settlements, subject to direct review of each release.

F-11 2019 R-1 "Visitor Accommodation" reclassification

HIGH CONFIDENCE FACT

Statement. A Philadelphia zoning-use permit issued 2019-01-23 (permit #941533) reclassifies twenty-five units at Goldtex from R-2 Dwelling to R-1 "Visitor Accommodation," leaving 138 units as R-2 Dwelling. A corresponding Certificate of Occupancy for the R-2-to-R-1 conversion was issued 2019-03-11 (permit #945680).

Evidence	Source [rating]
Philadelphia Department of Licenses & Inspections permit records via Philly Carto <i>li_permits</i> table.	Philly Carto SQL [A1]

Analysis. An R-1 / R-2 mixed-use residential building has different disclosure, tax, and life-safety obligations for its short-term (R-1) component than for its long-term (R-2) component. Whether the R-1 units were operationalized as short-term rentals, and whether leasing practices for the R-2 units have remained consistent with their R-2 classification, is not established by this collection.

Implication. Potentially relevant to disclosure-based consumer claims and to Philadelphia Tourism-tax compliance. Not central to habitability theories but worth flagging for counsel in any portfolio-breadth assessment.

F-12 Ground-floor commercial tenants

HIGH CONFIDENCE FACT

Statement. Two active ground-floor commercial tenants at Goldtex have current Philadelphia business licenses for Food Preparing & Serving (30+ seats): Elixir Coffee (active since 2018, renewed through 2026-07-15) and El Purepecha Inc. (active since 2020, renewed through 2026-10-19). Two prior commercial tenants (BUCA 1 Inc., B & M Hospitality LLC) have inactive licenses.

Evidence	Source [rating]
Philly Carto <i>business_licenses</i> table for parcel 881519440, restricted to commercial license types.	Philly Carto SQL [A1]

Analysis. Ground-floor commercial tenants are potential *additional* plaintiffs if (a) the building's certified-operating status were challenged or (b) habitability failures materially affect commercial space. Their current lease terms are not public; this is a follow-on collection item.

Implication. Flagged for counsel; not a core finding of this assessment.

F-13 Active federal litigation against either entity

HIGH CONFIDENCE FACT

Statement. As of the collection date, the following matters are active or recently filed in federal court: (a) *Star Creations Inc. v. Post Brothers*, E.D.N.Y. 1:26-cv-02197 (breach of contract, filed 2026-04-14); (b) *Post Brothers Holdings, LLC v. Affiliated FM Insurance Company*, D.N.J. 2:25-cv-18589 (insurance coverage,

filed 2025-12-12, Post Brothers plaintiff); (c) *Jean-Baptiste v. Post Commercial Real Estate, LLC*, E.D. Pa. 2:22-cv-01719 (employment discrimination); (d) *Wu v. Greystar Real Estate Partners, LLC*, S.D. Cal. 3:25-cv-01090 (deceptive trade practices, filed 2025-04-29); and additional Greystar dockets in W.D. Wash., D. Md., S.D. Fla., W.D.N.C., E.D.N.C., D. Mass. The RealPage/algorithmic-pricing cluster includes 159+ cases across jurisdictions.

Evidence	Source [rating]
CourtListener RECAP federal docket search by party name.	CourtListener [A1]
Individual docket entries retrieved from CourtListener for the matters named.	CourtListener [A1]

Analysis. *Wu v. Greystar Real Estate Partners* is the most relevant existing matter for a PA-consumer action: a consumer-style "deceptive trade practices" action at the parent-entity level. Pleadings, motion practice, and any Rule 12 rulings will preview motion-practice posture Greystar may adopt in PA.

Implication. *Wu* warrants a reading before counsel drafts. The *Post Brothers Holdings, LLC v. Affiliated FM* insurance-coverage matter also warrants review — the coverage posture may matter for any realistic assessment of collectibility on a large-number PA judgment.

5. Analysis of Alternatives

Per ICD 203 Tradecraft Standard #4, each major analytic judgment is tested against at least one alternative hypothesis. The alternatives below were considered actively and are documented with the evidence and reasoning that supported retention or rejection.

A-1 License expiration is administrative, not substantive

Hypothesis. The lapsed rental license (F-01) reflects an in-process renewal or a clerical delay at Philadelphia L&I rather than a live compliance problem.

Evidence that would support it. If a renewal application had been filed timely, some portal systems would show a pending renewal or extension date. Small renewal lags are not uncommon and would not independently signal noncompliance.

Evidence against. (i) No "renewal pending" flag is reflected in the Carto business_licenses record; the record reads simply "Expired." (ii) All other checked Post Brothers Philadelphia rental licenses are Active with future expirations — if the issue were an owner-side or L&I-side bulk processing delay, it would likely affect the portfolio rather than this single parcel. (iii) The expiration date (2026-02-28) is nearly two months in the past.

Verdict. Rejected at HIGH confidence. The simplest explanation consistent with the full record is that the license is expired and not yet renewed, not that it is administratively pending. (Subject to counsel obtaining a direct attestation from L&I in any subsequent discovery.)

A-2 UNFIT STRUCTURE designations are isolated to renovation units

Hypothesis. The two UNFIT STRUCTURE designations (F-05) were issued against specific units undergoing renovation or otherwise taken out of service, and therefore do not reflect habitability risk to other residents.

Evidence that would support it. A property manager's ordinary course of business can include taking individual units off-line for renovation. L&I will sometimes issue an UNFIT STRUCTURE notice tied to a narrow unit or system.

Evidence against. (i) The two UNFIT STRUCTURE NOVs were issued on the same day (2026-02-11) under two separate case numbers, each of which also carries a PM15-603.1 (Mechanical Equipment) and PM15-602.2 / 602.3 (Heating Residential) violation. (ii) The heating violations are location-tagged to occupied floors in NOV CF-2026-011056 (Unit 316, floors 2, 3, 5, 6) — i.e., to units being used as homes. (iii) No "vacant" tag appears in the Carto violations record for these cases.

Verdict. Partially supported but not sufficient. Plausible that the UNFIT STRUCTURE designations tag specific units; *not* plausible that those units are unoccupied or irrelevant to resident habitability. The implication for counsel: request L&I's inspector narrative for CF-2026-012614 and CF-2026-012633 at the earliest opportunity to resolve the gap.

A-3 The Post Brothers SPV structure is ordinary real-estate practice and does not support veil-piercing

Hypothesis. The pattern in F-07 (one LP/LLC per property, shared mailing, shared contact) is a standard commercial-real-estate holding structure with no special significance for alter-ego or instrumentality analysis under PA law.

Evidence that would support it. Multi-property real-estate operators commonly use per-asset SPVs for financing and liability-segregation reasons. The mere fact of the structure does not, by itself, support piercing.

Evidence against. (i) This assessment does not claim the structure alone supports piercing. KJ-5 is stated at LOW confidence. (ii) The pattern is a *necessary* element of any veil analysis; the *sufficient* elements (capital adequacy, formality observance, comingling) are not established by open source and require discovery.

Verdict. Valid concern. Retained as an explicit caution on KJ-5 and echoed in §7.

A-4 Pennsylvania is already covered by the national Greystar settlements

Hypothesis. Even if PA is not in the nine-state AG coalition, a PA tenant's claim may be precluded by the October 2025 \$141M private class settlement or by a general class-release in one of the federal actions.

Evidence that would support it. Multidistrict private class actions frequently have nationwide releases. Greystar's DOJ consent decree and the nine-state AG settlement also bind Greystar going forward in respect of the algorithm conduct.

Evidence against. (i) The DOJ consent decree does not include tenant-damage releases (see Courthouse News summary). (ii) The October 2025 private class was substantially or entirely RealPage-algorithm based; a habitability / licensure / UTPCPL-disclosure claim is not the same cause of action. (iii) PA-specific claims sounding in the state UTPCPL and the implied warranty of habitability under *Pugh v. Holmes* are state-law claims that generally cannot be released by a federal private-class action without PA opt-in.

Verdict. Rejected. KJ-4 is retained, subject to counsel's direct review of the specific release language in each resolved matter.

A-5 The open fire-safety NOV's are in active cure but not yet updated

Hypothesis. The three fire-safety NOV's open since 2025-08-23 (F-04) may reflect a record-update lag rather than sustained non-compliance. A licensed contractor may have uploaded current certifications without L&I closing the record.

Evidence that would support it. Government record-systems can lag. It is not impossible for a compliance item to be functionally resolved but still appearing as OPEN.

Evidence against. (i) Eight months is a large delta for a record-update lag. (ii) The NOV text explicitly required a "licensed contractor upload certification on to Eclipse portal" — an action whose completion *would* update the record. (iii) No secondary reporting or L&I public statement indicates the items are under abatement.

Verdict. Not supported. Rejected at HIGH confidence. The simplest explanation is that the fire certifications remain absent from the system.

6. Intelligence Gaps

The following items were either not accessible from open sources in this collection or were accessible only in forms that could not be verified at professional standard. Each is expressly listed to keep consumer expectations calibrated and to enable targeted follow-on collection, consistent with ICD 203 Tradecraft Standards #1 (source quality) and #2 (uncertainty expression).

ID	Gap	Why it matters	Suggested resolution
G-01	PA Department of State business-entity record for each Post-named LP/LLC (officers, registered agent, formation date, status).	Completes the alter-ego analysis inputs and identifies individual principals.	Manual browser session at file.dos.pa.gov/search/business for each entity name in F-07.
G-02	PhilaDox recorded deed and mortgage history for parcel 881519440 (Book/Page 52268172 and any subsequent filings).	Establishes chain of title, secured creditors, and any UCC filings.	Paid session-based lookup at epay.phila-records.com .
G-03	Philadelphia Court of Common Pleas civil docket for any landlord-tenant or civil proceeding naming the subject entities.	Surfaces any prior PA-specific tenant or habitability matter.	Manual search at fjdefile.phila.gov by party name.
G-04	OpenCorporates full entity map (free-tier API rejected default token).	Cross-jurisdictional corporate-structure verification.	Credentialed OpenCorporates access or direct state-DOS queries.
G-05	Inspector narrative for CF-2026-012614 and CF-2026-012633 (the two UNFIT STRUCTURE cases).	Identifies the specific units or systems deemed unfit; resolves A-2.	Philadelphia L&I records request or subpoena.
G-06	Full text of the FTC/Colorado settlement release and the October 2025 \$141M private class release.	Definitive preclusion analysis for KJ-4.	Direct review of the orders by PA counsel.
G-07	Current Elixr / El Purepecha lease terms (commercial tenants).	Potential additional plaintiffs under F-12.	Counsel contact with commercial tenants.
G-08	Any Pennsylvania AG inquiry or action regarding Greystar or RealPage between 2023 and the collection date (whether PA declined to join the 2025 coalition or is pursuing independently).	Calibrates the preclusion analysis in KJ-4 and F-10.	PA AG press-release archive; manual records request.

ID	Gap	Why it matters	Suggested resolution
G-09	Internal Greystar / Post Brothers communications about the rental license renewal, the fire-safety NOVs, and the UNFIT STRUCTURE designations.	Establishes knowledge, intent, and cure-attempt timing.	Formal discovery.

7. Implications & Recommendations

These are operational consequences of the findings above, stated for the consumer (PA-licensed counsel). They are not legal advice and they are not the only reasonable reading of the record. They are the actions this analyst would prioritize if the consumer asked "what should I do next, and why?"

7.1 For counsel

(i) **Treat the license expiration as the spine.** F-01 is the cleanest primary-source finding in the collection — single-fact, time-stamped, directly actionable, and still accumulating exposure day over day. It is not preempted by any resolved action against Greystar. A demand letter grounded in rent-retention / disgorgement theories can be drafted without awaiting discovery. (ii) **Pair it with the UNFIT STRUCTURE / heating / fire-safety cluster** (F-04, F-05, F-06) for a habitability overlay. (iii) **Run the Admiralty ratings inline in any demand or pleading** to preserve the source-separation discipline this product follows.

7.2 For class scoping

The open-source record supports at minimum two coherent sub-class theories. A building-wide sub-class grounded in F-01 and F-04 (license expiration and fire-safety compliance lapse) reaches all 163 units for the period each condition has persisted. A unit-specific sub-class grounded in F-05 and F-06 reaches those units named in the underlying NOVs — at least Unit 316 (floors 2, 3, 5, 6), Unit 202, Unit 612, Unit 1018, and the two UNFIT STRUCTURE locations — for the period each defect has persisted. The second requires resolution of G-05.

7.3 Priority follow-on collection

In order of expected marginal contribution to case posture: G-05 (UNFIT STRUCTURE inspector narratives); G-06 (release-language review); G-01 (PA DOS entity search); G-03 (Common Pleas civil docket); G-02 (PhilaDox deed & mortgage); G-07 (commercial tenant leases); G-08 (PA AG posture); G-09 (formal discovery).

7.4 Preservation posture for the existing record

All URLs cited in Appendix A should be captured to the Internet Archive Wayback Machine at earliest opportunity (some portals will refresh the underlying data nightly, e.g., the Carto violations table). Local snapshot captures — including the Philly Carto violations CSV at parcel 881519440 as of the collection date — should be preserved in a litigation-hold container on the consumer's side.

Appendix A — Source Registry

Every primary source contributing to a finding or judgment in this assessment is listed below. Each is graded on the Admiralty Code axes (reliability letter A–F / credibility number 1–6). Dates reflect when the item was observed; dynamic sources may have changed since.

A.1 Philadelphia city portals

ID	Source	Used for	Rating
S-01	Philly Carto SQL endpoint: phl.carto.com/api/v2/sql. Queries: opa_properties_public; li_permits; violations; violation_statuses. business_licenses;	F-01 (license); F-02, F-03, F-05, F-06 (violations); F-07 (portfolio); F-11, F-12 (permits/commercial).	A1
S-02	Philadelphia AIS REST: api.phila.gov/ais/v1/search/. Parcel, OPA account resolution. address,	Parcel identity; normalized address for 315-23 N 12th St.	A1
S-03	L&I Eclipse public download URLs: eclipse.phila.gov/phillylmsprod/pub/lms/download.aspx. Five NOV PDFs: CF-2025-089778 (Aug 2025 fire-safety); CF-2025-121546 (Nov 2025 Unit 1018); CF-2026-010311 (Feb 2026 Unit 202); CF-2026-011056 (Feb 2026 Unit 316); CF-2026-038488 (Apr 2026 Unit 612).	F-02, F-04, F-05, F-06 (per-unit narrative).	A1

A.2 Federal and state court records

ID	Source	Used for	Rating
S-04	CourtListener REST API and RECAP archive: courtlister.com/api and courtlister.com/recap. Docket retrievals for <i>Hall v. Greystar</i> E.D.N.C. 5:25-cv-00740; <i>Wu v. Greystar</i> S.D. Cal. 3:25-cv-01090; <i>Rice</i> W.D. Wash. 2:26-cv-00140; <i>Dlin</i> D. Md. 8:25-cv-01215; <i>Rodriguez</i> W.D.N.C. 3:26-cv-00126; <i>Srado</i> S.D. Fla. 9:26-cv-80213; <i>Glenn D.</i> Mass. 1:26-cv-10252; <i>Star Creations</i> E.D.N.Y. 1:26-cv-02197; <i>Post Brothers Holdings v. Affiliated FM</i> D.N.J. 2:25-cv-18589; <i>Jean-Baptiste</i> E.D. Pa. 2:22-cv-01719; <i>Roberson v. Post</i> E.D. Pa. 2:13-cv-06730.	F-08 (Greystar corporate chain via Rule 7.1); F-13 (active litigation landscape).	A1
S-05	NLRB public case records: nlrb.gov/case/04-CA-105691 and 04-CA-132742 — "Post Brother's Estates d/b/a Post Brother's Apartments".	F-07 (historical d/b/a).	A1

A.3 Federal agency and state AG releases

ID	Source	Used for	Rating
S-06	FTC press release, 2 Dec 2025 — \$24M settlement with Greystar re junk fees (joint with Colorado).	F-09.	A1
S-07	DOJ Office of Public Affairs, Aug 2025 — proposed consent decree against Greystar re RealPage algorithm (MDNC, Judge Osteen).	F-09.	A1
S-08	California AG Bonta, Minnesota AG Ellison, North Carolina AG Jackson, Oregon AG Rayfield, Massachusetts AG Campbell press releases — 19-20 November 2025 — \$7M nine-state settlement. Coalition members: CA, CO, CT, IL, MA, MN, NC, OR, TN.	F-09, F-10 (PA non-membership).	B1
S-09	Multifamily Dive, NCDNJ, MassLandlords.net secondary reporting on the October 2025 \$141M tenant class settlement across 26 landlords.	F-09 (private class release).	B2
S-10	ProPublica and Courthouse News coverage of the DOJ consent decree and tenant-damages scope.	F-09 analysis.	B2

A.4 Corporate / DNS / WHOIS

ID	Source	Used for	Rating
S-11	Public WHOIS for greystar.com (465 Meeting St Ste 500, Charleston SC 29403; registrant email nmason@greystar.com).	F-08 corporate identity; not relied on for structural conclusions.	B1
S-12	Greystar Real Estate Partners public website (greystar.com/goldtex-philadelphia-pa/p_22798).	Manager identity confirmation.	B2
S-13	Greystar Rule 7.1 corporate disclosure, ECF No. 10 in <i>Hall v. Greystar LLC</i> (E.D.N.C. 5:25-cv-00740, filed 2026-03-02).	F-08 (corporate chain: Greystar LLC → Greystar Real Estate Partners, LLC → GREP General Partner, LLC).	A1

A.5 Individual tenant documentation (provided separately)

Certain corroborative items referenced in KJ-6 (e.g., the 2026-04-14 prospective-tenant disclosure) are from the consumer's separate tenant-documentation product (not an open-source item). Those items are graded [C2] in this assessment — "fairly reliable source, probably true" — consistent with contemporaneous first-person records that have not been independently verified by this analyst. They are cited here only to support the preclusion analysis in KJ-4 and F-10; they are not used as primary evidence for any F-NN finding.

Appendix B — Lexicon Quick Reference

B.1 Nine ICD 203 Analytic Tradecraft Standards (applied in this assessment)

#	Standard	Where implemented
1	Properly describes quality and credibility of underlying sources	§3.2; Appendix A source ratings; inline [A1] tags on every finding.
2	Properly expresses and explains uncertainties associated with major analytic judgments	§3.3 (confidence); §3.4 (likelihood); KJ-1 through KJ-6 each carry a confidence level.
3	Properly distinguishes between underlying intelligence information and analysts' assumptions and judgments	FACT / ASSESSMENT / ASSUMPTION tag on every finding.
4	Incorporates analysis of alternatives	§5 (five alternative hypotheses explicitly considered).
5	Demonstrates customer relevance and addresses implications	§2.2 (PIRs); §7 (implications & recommendations).
6	Uses clear and logical argumentation	Each finding: Statement → Evidence → Analysis → Implication.
7	Notes and explains change or consistency of analytic judgments	v1.0 → v2.0 change callout in §1 bottom; Appendix C change log.
8	Makes accurate judgments and assessments (confidence and likelihood calibration)	§3.3 and §3.4 tables; confidence and likelihood applied distinctly.
9	Properly incorporates visuals	Tables and colored title bars used purposefully; no decorative graphics.

B.2 Admiralty Code quick card

Source reliability: **A** completely reliable / **B** usually / **C** fairly / **D** not usually / **E** unreliable / **F** cannot be judged. Information credibility: **1** confirmed by others / **2** probably true / **3** possibly true / **4** doubtful / **5** improbable / **6** cannot be judged.

B.3 Confidence / likelihood quick card

Confidence (analyst's certainty in a judgment): HIGH — multiple independent high-reliability sources converge; MODERATE — credible with gaps; LOW — tentative working hypothesis.

Likelihood (probability of an event or condition): almost certainly (≥95%); very likely (80–95%); likely (55–80%); roughly even chance (45–55%); unlikely (20–45%); very unlikely (5–20%); almost no chance (≤5%).

Appendix C — Change Log & Version History

Version	Date	Changes
v1.0	23 April 2026	Initial open-data compilation. Included the full OPA record, L&I violation listing, permit history, expired rental license, Post Brothers portfolio table, Greystar enforcement landscape, active federal litigation cluster, and research gaps. Did not apply ICD 203 tradecraft structure, Admiralty source grading, or explicit confidence/likelihood lexicon.
v2.0	24 April 2026	ICD 203-compliant rebuild. Added: Key Judgments with explicit confidence levels; Priority Intelligence Requirements; methodology with Admiralty Code and lexicons; FACT/ASSESSMENT/ASSUMPTION tagging on every finding; Analysis of Alternatives section with five alternative hypotheses; dedicated Intelligence Gaps section; source registry with per-source ratings; October 2025 private class settlement of \$141M (new to v2.0); independent verification that Pennsylvania is not in the nine-state AG coalition. No factual finding retracted. KJ-3 explicitly downgraded to "very likely" given single-day snapshot dependency.

End of assessment. Next scheduled refresh: on request or upon resolution of any gap G-01 through G-09.