

NO. 141-370402-25

WEINSTEIN MANAGEMENT CO., § IN THE DISTRICT COURT OF
INC. AND WMCI DALLAS X, LLC, §
Plaintiffs and Counter-Defendants, §
v. § TARRANT COUNTY, TEXAS
§
KATHRYN COPELAND, § 141ST JUDICIAL DISTRICT
Defendant and Counter-Plaintiff. §

**Defendant's Emergency Motion to Vacate Temporary Injunction
and Enter Affirmative Relief by Submission
(ADA/FHA – Fraud on Court – Constructive Eviction)**

TO THE HONORABLE JOHN P. CHUPP, JUDGE OF SAID COURT:

Defendant/Counter-Plaintiff Kathryn Copeland files this Emergency Motion pursuant to TRCP 683 and 684, the ADA, the FHA, the DTPA, and the Court's inherent equitable powers to correct an order obtained through material misrepresentations and to prevent imminent, irreparable harm to her health, housing, and property.

I. INTRODUCTION AND EMERGENCY NATURE

Defendant respectfully seeks emergency correction of an injunction entered on an incomplete and inaccurate record. Plaintiffs' own licensed assessments—BioTex (June 18, 2025) and Dallas Mold Consultants (September 8, 2025 – only recently obtained on October 23, 2025 despite ongoing requests)—found the apartment unfit for human occupancy, documented *apartment-wide contamination* including Chaetomium and elevated Aspergillus, and required licensed, state-noticed remediation with negative air and clearance. Plaintiffs concealed or omitted these findings while attributing “new” damage to Defendant. Narrow relief by written

submission will prevent irreparable harm and reduce total cost: prepaid ADA-effective housing, neutral MAC-supervised preservation with no-disposal, licensed-only remediation with clearance, targeted document production in 7 days, and an adequate bond.

II. SUMMARY OF RELIEF REQUESTED

Defendant asks the Court to enter the attached Proposed Order Granting Emergency Interim Relief and Setting Submission, which:

1. Stays and modifies enforcement of the October 16, 2025 Temporary Injunction.
2. Orders Plaintiffs to provide ADA/FHA-compliant temporary housing comparable to Defendant's prior accommodations, at a cost not to exceed \$22,000 per month, or a per-diem reflecting her verified current expense of approximately \$683/day, inclusive of rent, utilities, furnishings, and pet accommodations.
3. Directs reinstatement of prescribed home-health and therapy care at Plaintiffs' expense.
4. Orders preservation of property with no-disposal terms and production of remediation records.
5. Appoints a neutral, licensed Mold Assessment Consultant (MAC) to oversee contents classification and remediation compliance.
6. Authorizes a \$5,000 immediate necessities fund for essential clothing and items destroyed or contaminated by mold exposure.
7. Provides an \$80/day food per diem and a \$30/day local transport stipend.
8. Provides Replacement Cost Value for all of Defendant's contaminated property.
9. Sets targeted document production within 7 days and increases bond under TRCP 684.
10. Sets all pending matters for decision on written submission, consistent with ADA process accommodations, unless the Court later sets limited oral argument.

III. FACTUAL BACKGROUND AND NEW EVIDENCE

1. BioTex Inspections (June 18, 2025) declared Defendant's apartment at 405 Crawford St., Apt. 2145, Fort Worth, "unfit for human occupancy" due to toxic mold contamination.
2. Dallas Mold Consultants Protocol (September 8, 2025) (DMC) documented "heavy Chaetomium and elevated Aspergillus throughout;" identified "no negative pressure" on the containment; required licensed, state-noticed remediation, HVAC remediation/sealing, and clearance criteria; noted flooring components slated for

removal/disposal due to damage; and that *all contents in the apartment should be considered contaminated.* (Exhibit A)

3. Plaintiffs nonetheless filed suit on September 19, 2025, asserting Defendant obstructed remediation and caused new damage, while omitting or concealing the licensed DMC findings.
4. On October 16, 2025, a Temporary Injunction issued after Defendant's procedural exclusion from the Zoom hearing. Defendant was online and sent email to court coordinator at 10:30 AM, but log in was not successful until 10:34-10:35 AM. (Exhibit B)
5. Plaintiffs have stated they will end hotel funding on October 26, 2025, despite the unit's uninhabitability and no Certificate of Mold Remediation. (Exhibit C)
6. Verified invoices hotel invoices and dog-boarding costs show displacement costs averaging approximately \$683/day, exceeding Plaintiffs' earlier \$554/day baseline. (Exhibit D)
7. The licensed record contradicts Plaintiffs' core narratives that Defendant caused contamination, obstructed remediation, or caused new HVAC water damage. Containment deficiencies, pre-existing flooring damage, and required licensed remediation/clearance predate Plaintiffs' allegations. Narrow, lower-cost relief is available now: prepaid ADA-effective housing; neutral MAC-supervised preservation with no-disposal; licensed-only remediation with compliance certification; targeted production in 7 days; and an adequate bond.

IV. DEFECTS UNDER TRCP 683–684

The October 16, 2025 Temporary Injunction is defective and must be vacated or modified because it fails to:

1. State the reasons for its issuance with specificity.
2. State the irreparable injury to be suffered.
3. Define the injury and describe the acts restrained in reasonable detail.
4. Set forth reasons why the bond amount is proper and adequate.
5. Comply with signature/date and specificity requirements.

Any one omission merits vacatur; together they warrant vacatur or modification with affirmative relief to prevent imminent harm and restore a lawful status quo.

V. FRAUD ON THE COURT AND MATERIAL MISREPRESENTATIONS

Plaintiffs obtained the October 16, 2025 injunction through **concealment of material evidence—the September 8, 2025 Dallas Mold Consultants (DMC) protocol**, which documented apartment-wide contamination, “no negative pressure,” and the need for licensed remediation and clearance. These licensed findings **directly contradict** Plaintiffs’ sworn statements that Defendant caused “new” damage, obstructed remediation, or interfered with compliant containment.

To assist the Court in identifying the most serious discrepancies, Defendant has prepared **Exhibit A-1 (Plaintiffs’ Misrepresentations Chart)**, summarizing each false or misleading assertion, the contradictory licensed evidence, and the targeted corrective relief required.

On **October 14, 2025**, Defendant wrote to Plaintiffs’ counsel, **Glynis Zavarelli**, asking for clarification and test results:

“I also noticed an invoice referencing testing from the apartment, but I have not received those results. Please provide a copy of the findings. They are medically

significant and necessary for understanding the extent of exposure and appropriate next steps for my treatment.”

(Exhibit F, October 14 Email to Plaintiffs’ Counsel.)

Despite this explicit written request—and while in possession of the DMC protocol and corresponding laboratory data—Plaintiffs refused to disclose these materials to either Defendant or the Court. The concealed evidence directly affects Defendant’s ongoing medical care and **proves that Plaintiffs’ narrative was false when presented.**

Concealing known contamination while accusing Defendant of causing it constitutes **fraud on the court** and a clear violation of counsel’s **duty of candor**. The Texas Supreme Court defines such conduct as “egregious misconduct that undermines the integrity of the judicial process.” *King Ranch v. Chapman*, 118 S.W.3d 742 (Tex. 2003).

Defendant therefore provides **notice of intent to seek disqualification of Plaintiffs’ counsel and sanctions** for misrepresentations and suppression of material evidence critical to both the Court’s rulings and Defendant’s health. Plaintiffs’ concurrent **Motion for Protective Order Regarding Defendant’s Written Discovery** (filed October 10, 2025), seeking to withhold these same records, underscores the deliberate nature of this concealment and its unconscionable impact.

VI. ADA/FHA VIOLATIONS AND SUBMISSION ACCOMMODATIONS

Denying Defendant safe housing and effective participation constitutes **unlawful exclusion** under the ADA and FHA, 42 U.S.C. §§ 12132 and 3604(f)(3)(B). Written submission with defined reply windows is a reasonable accommodation that ensures equal access while conserving judicial resources. Plaintiffs’ refusal to provide ADA-compliant, stable housing

continues to endanger Defendant's health and violate federal law. Defendant has identified suitable short- and long-term rentals meeting ADA/FHA standards and seeks **Replacement Cost Value** for personal property confirmed contaminated by Plaintiffs' own September 8, 2025 mold-assessment report. (*See Exhibit E.*)

VII. CONSTRUCTIVE EVICTION, CONTINUING TORT, AND RETALIATION

Under Tex. Prop. Code §§ 92.052–056 and § 92.331, Plaintiffs' concealment of unsafe conditions and retaliation for protected complaints triggered **continuing statutory duties** beyond lease expiration. Constructive eviction occurred when the unit became uninhabitable and Defendant vacated on **July 14, 2025**. Once premises are uninhabitable, a tenant's duty to pay rent is **suspended until cure**. *See Kamarath v. Bennett*, 568 S.W.2d 658 (Tex. 1978). Plaintiffs' plan to end hotel accommodations on **October 26, 2025** compounds these violations, as a tenant wrongfully deprived of habitable housing bears **no rent obligation** arising from the landlord's breach.

VIII. ECONOMIC EFFICIENCY AND PUBLIC INTEREST

Plaintiffs' "status-quo spend" on hotels and dog boarding (\$85/night) averages approximately \$683/day. (Exhibit D) Ordering an ADA-effective furnished placement with a cap not to exceed \$22,000/month preserves or reduces total cost, stabilizes medical care, and prevents cost-shifting to Medicaid/STAR+Plus. Equity favors maintaining payments that minimize public and private harm pending trial.

IX. REQUESTED FINDINGS AND ORDERS

Defendant respectfully requests that the Court make the following findings and enter corresponding orders:

1. **Judicial Notice.** The Court shall take judicial notice of the licensed inspection records: the June 18, 2025 BioTex report (declaring the premises unfit for human occupancy) and the September 8, 2025 Dallas Mold Consultants protocol (documenting apartment-wide contamination and required licensed remediation).
2. **ADA/FHA-Compliant Housing.** Plaintiffs shall fund and maintain furnished housing that meets Defendant's medical and functional needs—including accessible bathing, kitchen for anti-inflammatory diet, in-unit laundry, hypoallergenic filtration, and therapy access—with a monthly cap not to exceed **\$22,000** inclusive of rent and utilities, administered as prepaid rent or direct pay.
3. **Per-Diem and Essentials Support.** Plaintiffs shall provide an **\$80/day food per diem**, a **\$30/day local transport stipend**, and a **\$5,000 necessities fund** within 48 hours for replacement of contaminated clothing and essential personal items.
4. **Reinstatement of Care.** Plaintiffs shall reinstate prescribed **home-health and therapy services** at their expense to ensure medical continuity.
5. **Preservation and Neutral Oversight.** No building materials or personal property shall be altered, cleaned, treated, or disposed without written notice to Defendant and authorization by a **neutral, court-appointed Mold Assessment Consultant (MAC)**. The MAC shall classify contents by porosity, maintain weekly photo inventories, and certify that all remediation complies with the Texas Mold Assessment and Remediation Rules (TMARR) and the DMC protocol.
6. **Targeted Production (7 Days).** Within seven (7) days, Plaintiffs shall produce:
 - i. All TDLR mold notices and vendor licenses/insurance;
 - ii. Containment, negative-air, and HVAC operation logs (Sept. 1–Oct. 16, 2025);
 - iii. All protocol versions and clearance criteria;
 - iv. Air and surface sampling results;
 - v. Chain-of-custody inventories with photographs and locations of all removed property; and
 - vi. Communications authorizing vendors to pack, move, test, or remediate Defendant's property.
7. Failure to produce may warrant an adverse inference.
8. **Licensed-Only Work.** All remediation and rebuild work shall be performed exclusively by licensed contractors with TMARR compliance and verified clearance before encapsulation or reconstruction.
9. **Bond.** The Court shall set or increase bond under **TRCP 684** to reflect the scope of Plaintiffs' ongoing control of Defendant's housing and property.
10. **Submission Setting.** Consistent with ADA accommodations, all pending matters shall be determined by **written submission** with defined reply deadlines unless the Court later sets limited oral argument.

11. **Replacement Cost Value.** Plaintiffs shall compensate Defendant at full **Replacement Cost Value** for all personal property confirmed contaminated or destroyed by the toxic exposure, consistent with insurance and DTPA recovery principles.
12. **Further Relief.** The Court may grant any additional equitable relief necessary to prevent irreparable harm and preserve the lawful status quo.

X. PRAYER

Defendant **respectfully prays** that the Court grant this Motion, **stay and modify** the October 16, 2025 Temporary Injunction consistent with the foregoing orders, **enter the attached Proposed Order Granting Emergency Interim Relief and Setting Submission**, and award such further relief, at law or in equity, to which she is justly entitled.

Respectfully submitted,



KATHRYN COPELAND
405 Crawford St. #2145
Fort Worth, Texas 76104
Tel: (817) 789-8498
K.M.Copeland@tcu.edu
Defendant and Counter-Plaintiff

UNSWORN DECLARATION PURSUANT TO TEXAS CIVIL PRACTICE & REMEDIES CODE 132

“My name is Kathryn Marie Copeland, my date of birth is June 28, 1985 and my current address is 405 Crawford Street #2145, Fort Worth, TX 76104 in the United States of America. I declare under penalty of perjury that the foregoing is true and correct. Executed in Tarrant County, State of Texas, on October 23, 2025.”



KATHRYN COPELAND

CERTIFICATE OF CONFERENCE

Defendant certifies that a conference with opposing counsel was not held prior to filing this Emergency Motion due to the time-sensitive nature of the relief requested and the imminent risk of irreparable harm. Defendant has previously conferred with Glynis Zavarelli and Michelle Sortor regarding related matters, and further efforts to resolve these issues without court intervention would be futile.

Accordingly, this motion is submitted for immediate consideration.



Kathryn Copeland

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was served on counsel of record this 23rd day of October 2025 in accordance with the Texas Rules of Civil Procedure.

Via Electronic Service

Glynis Zavarelli
gzavarelli@wandzlaw.com

Michelle Sortor
msortor@wandzlaw.com



KATHRYN COPELAND

Exhibit Index

- A. Dallas Mold Consultants Protocol (September 8, 2025) – containment, negative air, HVAC remediation, clearance
 - i. Exhibit A-1 – Plaintiffs’ Assertions vs. Sept. 8 Record Chart with pinpoint cites
- B. Exhibit B – October 16, 2025 email from Defendant to Court Coordinator at 10:30 AM
- C. Exhibit C – October 16, 2025 email from Plaintiffs’ counsel regarding 10/26/25
- D. Exhibit D – Hotel invoice
- E. Exhibit E – ADA/FHA accommodation emails (showing need for effective housing)
- F. Exhibit F – October 14, 2025 email from Defendant to Plaintiffs’ counsel regarding request for protocol

Subject: Re: Follow-Up on September 8 Mold Assessment Report
Date: Thursday, October 23, 2025 at 12:05:13 PM Central Daylight Time
From: Dayna Boor
To: Katie Copeland
Attachments: Weinstein-090425_Mold_Remediation_Protocol.pdf, Weinstein-090425_Reinspection_Report.pdf, Weinstein-090425_Air_Samples_Full_Lab_Report.pdf, Weinstein-090425_Tape_Lift_Full_Lab_Report.pdf, Weinstein-090425_Entry_Surface_Swab_Sample_Full_Lab_Report.pdf

Katie,

Please see attached reports. The remediation protocol was sent on 9/8. I was not initially made aware of the area by the front door but did go back and do an inspection of that area on 10/17. My swab sample collected by the front door on 10/17 did not find any Stachybotrys or anything unusual. I've attached my re-inspection report of that area. I did suggest that the baseboards and drywall in that area could be removed to further inspect.

For the contents - the remediation protocol calls for the contents to be packed-out of the apartment and cleaned according to EPA guidelines. The contents needed to be moved out so that the remediation company had room to perform a full environmental cleaning on the entire apartment.

I hope this information is helpful to you.

Dayna

On Thu, Oct 23, 2025 at 12:23 AM Katie Copeland <quinnandpoppy@gmail.com> wrote:
Ms. Boor,

I hope you're doing well. I received what appears to be your September 8, 2025 Mold Assessment and Remediation Protocol for Weinstein Properties – Unit 2145, Bowery at Southside.

Could you please confirm that this is your report? If so, would you prefer to provide a cleaner version with all components, including lab results, so I can be sure I'm reading it accurately?

Do your records indicate when and to whom the report was delivered? I assume it was shortly after completion, but I want to make sure I understand the timing correctly.

Your report notes that the client requested the assessment following a water loss from the HVAC condensation drain line affecting the mechanical closet and guest bedroom. Were you provided with or made aware of any prior mold assessments or lab findings from BioTex Inspections in June 2025, particularly results showing Stachybotrys or other toxic mold near the front door?

Finally, does your remediation protocol specify that licensed mold remediation is

required and that contents should not be removed until clearance testing confirms safety? The area of contents cleaning is a bit foreign to me so I want to get an understanding of how my belongings are meant to be handled.

I appreciate your time and professionalism. I'm not asking for confidential opinions—just confirming a few factual details for accuracy.

Sincerely,
Katie Copeland
817-789-8498

From: Katie Copeland <quinnandpoppy@gmail.com>
Date: Thursday, October 2, 2025 at 9:07 PM
To: Dayna Boor <dayna@dallasmoldconsultants.com>
Subject: Re: Mold Assessment and Protocol

Yes, but I will try again.

Sincerely,
Katie Copeland
817-789-8498

From: Dayna Boor <dayna@dallasmoldconsultants.com>
Date: Thursday, October 2, 2025 at 6:03 PM
To: Katie Copeland <quinnandpoppy@gmail.com>
Subject: RE: Mold Assessment and Protocol

Katie,

I can only release reports to the client who hired me. In this case, the property management company. Have you asked them for it?

Dayna

Sent from my T-Mobile 5G Device

----- Original message -----
From: Katie Copeland <quinnandpoppy@gmail.com>
Date: 10/2/25 12:58 PM (GMT-06:00)
To: office@dallasmoldconsultants.com
Subject: Mold Assessment and Protocol

Hello,

I am the tenant at at 220 E. Broadway #2145, Fort Worth, TX 76104.
May I please have a copy of the mold assessment report, lab results, and protocol completed in early September? I am especially curious about the findings of the lab tests on my belongings.

Sincerely,
Katie Copeland
817-789-8498

--
Dayna Boor
Dallas Mold Consultants
www.dallasmoldconsultants.com
972-945-MOLD office
214-606-1330 cell

PROJECT INFORMATION

Weinstein-090425
220 E Broadway Ave #2145
Fort Worth, Texas 76104
Project No.: Not Provided

This test report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ

Air Exam Chain of Custody

Test Code 1: Spore Trap-fungal limited

Analysis Method: ASTM Designation D7391-17 (Modified)

DALLAS MOLD CONSULTANTS
(972) 945-6653
10440 N Central Expressway
STE 800
Dallas, Texas 75231

Company name	Dallas Mold Consultants			FM-17 External 10 Line					
Address	8080 N. Central Expy Ste 1700	City	Dallas	State	TX	ZIP	75206	Submitted By:	Dayna Boor
Project name	Weinstein - 090425			Cell phone	214-606-1330				
Project address	220 E Broadway Ave #2145, Ft. Worth, TX			Turnaround Time					
Project/functional				Email address:	dayn@dallasmoldconsultants.com				
Sample Date	09/04/2025			CC:					
MOLD									
Test Codes	Air Samples			Surface Samples			ASBESTOS		
Sample # or ID	1. Open trap, mold only 2. Open trap, mold & other particle			3. Open trap, mold only, stirring 4. Open trap, mold & other particle, stirring			5. Open trap, mold only, stirring 6. Open trap, mold & other particle, stirring		
Sample Name/Location or Description	Temp	R.H.%	Test code	Time on (application to air temperature min)	Time off (application to air temperature max)	Total Vol. (ml)	Sample Type (Type, Temp., humidity, etc.)	No. of Containers	
1. 090425-01 Guest Bedroom, Tape Lift	76	63	3	—	—	—	Type	1	
2. 090425-02 HVAC Closet, Drywall Tape Lift	76	63	3	—	—	—	Tape	1	
3. 00010444 HVAC Closet, Hallway	76	63	1	11:39am	11:49am	75L	air	1	
4. 00010785 Guest Bedroom	76	63	1	11:45am	11:50am	75L	air	1	
5. 00010449 Living Room	76	63	1	11:52am	11:57am	75L	air	1	
6. 00010704 Master Bedroom	76	63	1	11:58am	12:05pm	75L	air	1	
7. 00010650 Outside Baseline	92	43	1	12:05pm	12:10pm	75L	air	1	
8.									
9.									
10.									
Payment options	<input type="radio"/> Invoice to account	<input checked="" type="radio"/> Process credit card on file	<input type="radio"/> Enclosed check	Released by (print/signature) By signing this document, you are certifying that no samples were sent to another lab while your test was in progress. If so, list the lab(s) and contact info below: Time _____ Date: _____			Received Date Stamp		
Field Notes:							By:	D E C E N T E D SEP 04 2025	
Special Instructions:									
Tracking #:									

Lab Job # **25-111919** Lab Job No. **25-111920**

Rev. 7, Issue Date: 3/24/2022

2501 Mayes Rd. Ste. # 110 | Carrollton, TX 75006 | info@moldlab.com | 1-800-410-6653

Page **1** of **1**

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 9/4/2025 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111919 | Technician: Steven Reese

Results apply only to samples as received and tested. Results may not be reported or reproduced except in full without written approval of Moldlab. All samples were received in acceptable condition unless noted in the Tech Notes section. Field blank correction of results is not applied. An estimate of measurement uncertainty is provided upon request. Moldlab assumes no responsibility for sample collection or handling prior to receipt at the laboratory. This report does not express or imply interpretation of the results contained herein. LAB0137 by the Texas Dept. of Licensing and Regulation, AIHA LAP, LLC EMLAP Accredited ID No. 154782. Report Approved by Kristina Rucker

Approved by:

Kristina Rucker, Lab Director



moldlab
2501 Mayes Rd #110
Carrollton, Texas 75006
P - (972) 820-9373
Toll Free (866) 410-6653
Website - www.moldlab.com

Page 1 | 1

PROJECT INFORMATION:

Weinstein-090425

220 E Broadway Ave #2145

Fort Worth, Texas 76104

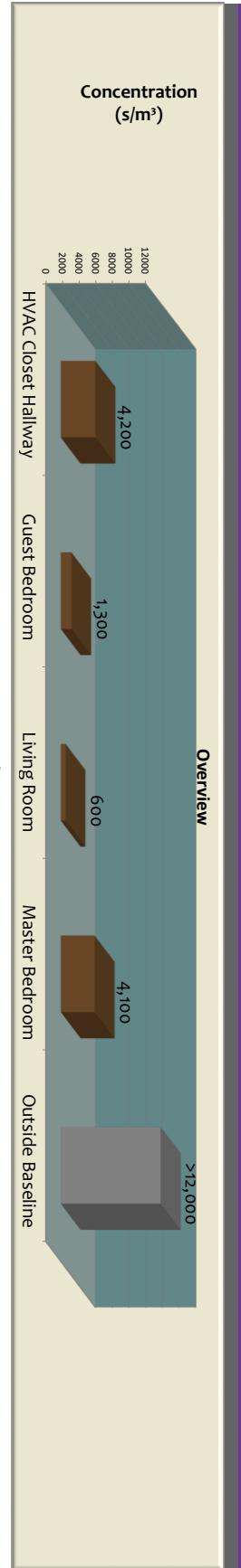
Project No.: Not Provided

This report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ.

Snapshot

Test Code 1: Spore Trap-fungal limited
Analysis Method: ASTM Designation D7391-17 (Modified)

STE 800



Location to Reference Comparison

Identification	HVAC Closet Hallway	Guest Bedroom	Living Room	Master Bedroom	Compares	Outside Baseline
	Sample Number	00010444	00010785	00010449	00010704	00010650
Volume (L)	75	75	75	75	75	75
	Raw	s/m³	Raw	s/m³	Raw	s/m³
Alternaria	-	-	-	1	43	43
Ascospores, non-specified	1	43	1	43	-	-
Aspergillus/Penicillium-like	71	3,000	12	510	2	85
Basidiospores, non-specified	-	-	-	1	43	-
Bipolaris/Dreschlera/Helminthosporium/Exserohilum	-	-	1	43	-	-
Cercospora	-	-	-	-	1	43
Chaetomium	15	640	7	300	-	5
Cladosporium	3	130	7	300	7	67
Curvularia	-	-	-	-	-	-
Fusarium	-	-	-	-	-	-
Hypothal Fragments	7	300	2	85	1	43
Mixomycetes/Periconia/Smut/Rust	-	-	-	1	43	16
Nigrospora	1	43	-	-	1	43
Pithomyces	-	-	-	-	-	-
Yeast-like fungi	-	-	-	-	-	-
Total Fungal Structures	98	4,200	30	1,300	14	600
Non-Microbial Debris Field Rating	Light	Light	Light	Light	Light	Light

Submitted By: Dayna Boor | Submittal Date: 9/4/2025 11:30:00 PM | Report Date: 9/5/2025 | Lab Job No.: 25-111919 | Analyst: Steven Reese
If a structure is not listed, or listed with a (-), it was not observed in the sample(s) submitted. Debris rating estimates the total non-fungal particle load on the sample. Ratings of None Detected, Trace (>0 to 5%), Light (>5% to 25%), Moderate (>25% to 75%), Heavy (>75% to 90%), and Occulted (>90%) are used. A rating of Light or higher may have a higher number of structures present than indicated. The higher the rating, the greater the negative bias. A rating of Occulted makes quantitative results impossible; instead, any structures detected will be marked as Detected.

Concentrations are rounded to two significant figures. The 'total field' may not add up to sum of individual types due to this rounding. The maximum raw count is 100 due to stopping rules. The calculated concentration for a 100 raw count will vary depending on the traverse in which the stopping rule was applied. Sample volumes are provided by the customer and impact the validity of structure concentrations. Yellow highlighted concentrations are higher than the reference. Samples received and analyzed by Moldlab, Ltd.



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2501 Mayes Rd #110
Carrollton, Texas 75006
Toll Free (866) 416-6653
Website - www.moldlab.com

 **DALLAS MOLD
CONSULTANTS**
(972) 945-6653
10440 N Central Expressway
STE 800

PROJECT INFORMATION

Weinstein-090425
220 E Broadway Ave #2145
Fort Worth, Texas 76104
Project No.: Not Provided

Analysis Method: ASTM Designation D7391-17 (Modified)

This test report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ.

Report

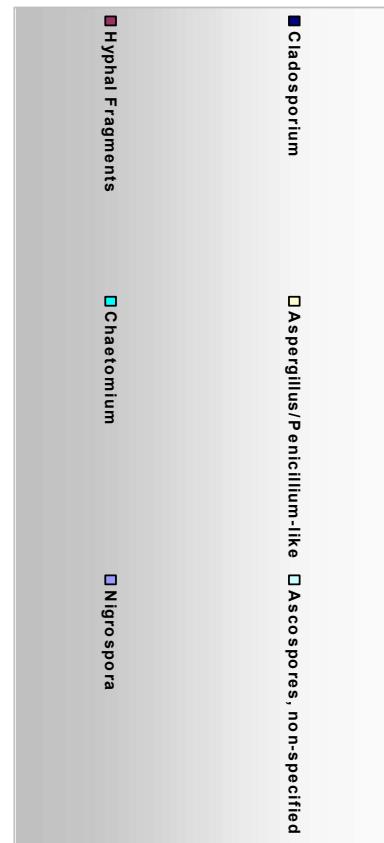
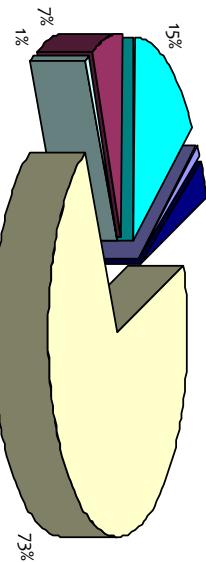
Test Code 1: Spore Trap -fungal limited
(972) 945-6653
10440 N Central Expressway
STE 800
Dallas, Texas 75231

Sample No:	00010444	Sample Type:	Allergenco D	Analysis Date:	9/5/2025	Sample Start Time:	11:39
Location:	HVAC Closet Hallway	Volume (l):	75	% Sample Analyzed**:	31.25%	Sample Stop Time:	11:44
Identification	Raw Count	Concentration (\$/m³)*	Analytical Sensitivity (\$/m³)*	Identification	Raw Count	Concentration (\$/m³)*	Analytical Sensitivity (\$/m³)*
Ascospores, non-specified	1	43	43	Aspergillus/Penicillium-like	71	3,000	43
Chaetomium	15	640	43	Cladosporium	3	130	43
Nigrospora	1	43	43				
Hyphal Fragments	7	300	43				
Total Fungal Structures/m³*:		4,200					

Total Fungal Structures/m³*:



Non-Microbial Debris Field Rating



Relative Mold Type Concentration

Tech Notes:

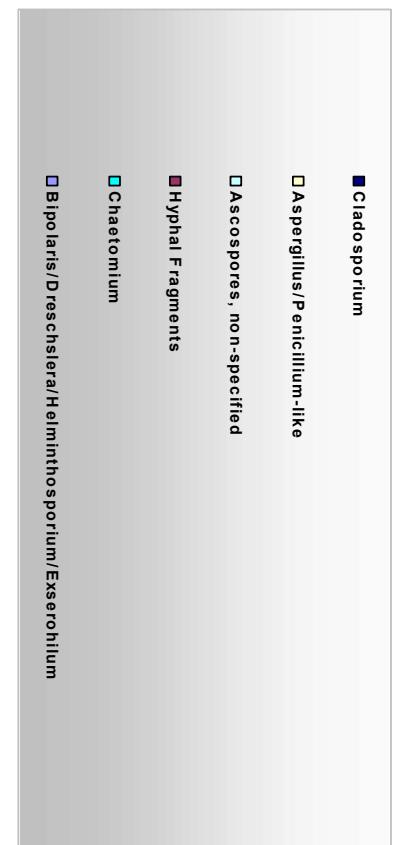
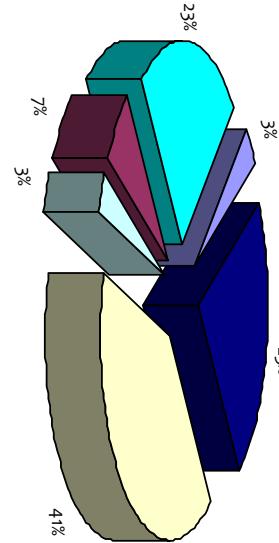
Submitted By: Dayna Boor | via Hand Delivered | Submittal Date: 4/9/2025 13:13 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111919 | Technician: Steven Reese

This test report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ.

Sample No: 00010785	Sample Type: Allergenco D	Analysis Date: 9/5/2025	Sample Start Time: 11:45
Location: Guest Bedroom	Volume (L): 75	% Sample Analyzed**: 31.25%	Sample Stop Time: 11:50

Identification	Raw Count	Concentration (s/m^3)*	Analytical Sensitivity (s/m^3)*	Identification	Raw Count	Concentration (s/m^3)*	Analytical Sensitivity (s/m^3)*
Ascospores, non-specified	1	43	43	Aspergillus/Penicillium-like	12	510	43
Bipolaris/Dreschslera/Helminthosporium/ Cladosporium	1	43	43	Chaetomium	7	300	43
Hyphal Fragments	2	85	43				
Total Fungal Structures/m³:		1,300					

Non-Microbial Debris Field Rating



Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 4/9/2025 13:13 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111919 | Technician: Steven Reese

This test report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ.

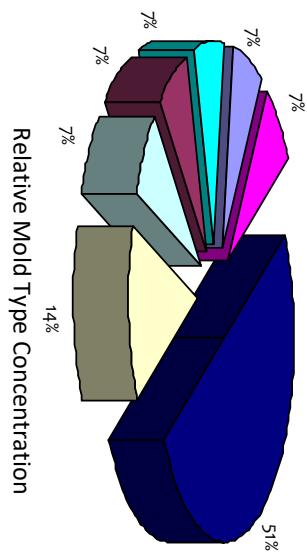
Sample No: 00010449	Sample Type: Allergenco D	Analysis Date: 9/5/2025	Sample Start Time: 11:52
Location: Living Room	Volume (L): 75	% Sample Analyzed**: 31.25%	Sample Stop Time: 11:57

Identification	Raw Count	Concentration (s/m^3)*	Analytical Sensitivity (s/m^3)*	Identification	Raw Count	Concentration (s/m^3)*	Analytical Sensitivity (s/m^3)*
Alternaria	1	43	43	Aspergillus/Penicillium-like	2	85	43
Basidiospores, non-specified	1	43	43	Cladosporium	7	300	43
Myxomycetes/Periconia/Smut/Rust	1	43	43	Nigrospora	1	43	43
Hyphal Fragments	1	43	43				
Total Fungal Structures/m^3*:	600						

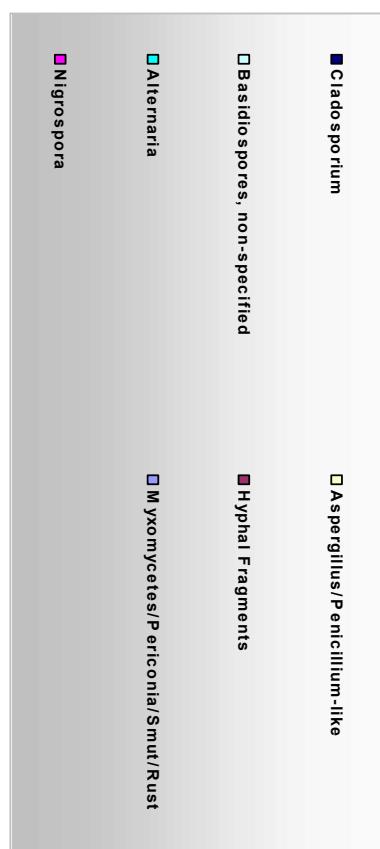
Total Fungal Structures/ m^3 *:



Non-Microbial Debris Field Rating



Relative Mold Type Concentration



Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 4/9/2025 13:13 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111919 | Technician: Steven Reese

This test report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ.

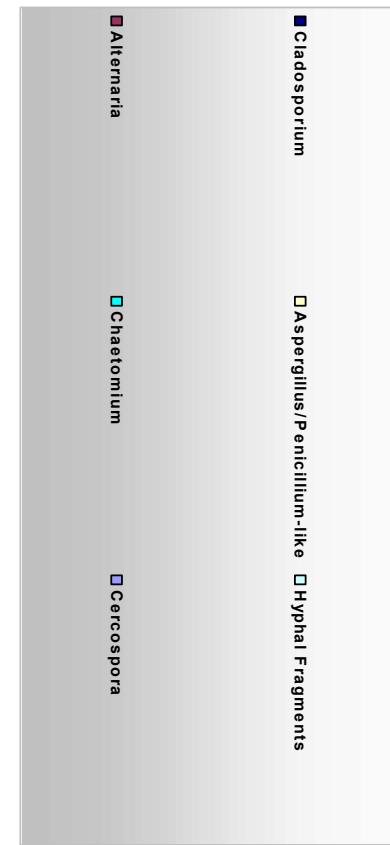
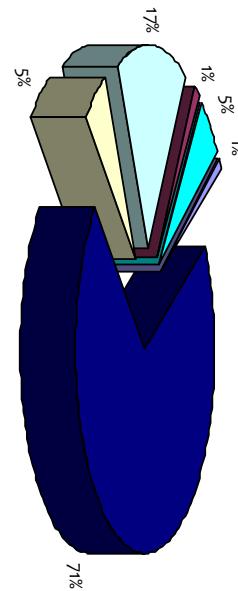
Sample No: 00010704	Sample Type: Allergenco D	Analysis Date: 9/5/2025	Sample Start Time: 11:58
Location: Master Bedroom	Volume (L): 75	% Sample Analyzed**: 31.25%	Sample Stop Time: 12:03

Identification	Raw Count	Concentration (s/m^3)*	Analytical Sensitivity (s/m^3)*	Identification	Raw Count	Concentration (s/m^3)*	Analytical Sensitivity (s/m^3)*
Alternaria	1	43	43	Aspergillus/Penicillium-like	5	210	43
Cercospora	1	43	43	Chaetomium	5	210	43
Cladosporium	67	2,900	43				
Hyphal Fragments	16	680	43				
Total Fungal Structures/m^3*:		4,100					

Total Fungal Structures/ m^3 *: 4,100



Non-Microbial Debris Field Rating



Relative Mold Type Concentration

Tech Notes:

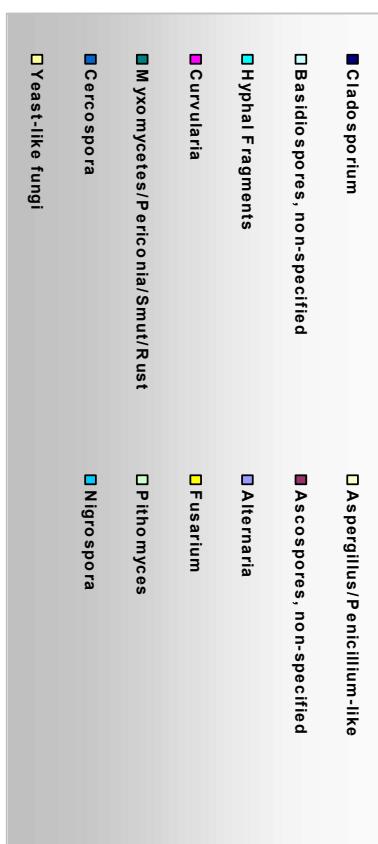
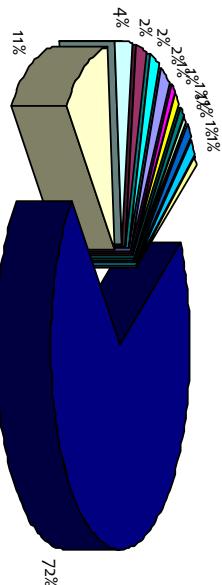
Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 4/9/2025 13:13 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111919 | Technician: Steven Reese

This test report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ.

Sample No: 00010650	Sample Type: Allergenco D	Analysis Date: 9/5/2025	Sample Start Time: 12:05
Location: Outside Baseline	Volume (L): 75	% Sample Analyzed**: 31.25%	Sample Stop Time: 12:10

Identification	Raw Count	Concentration (s/m^3)*	Analytical Sensitivity (s/m^3)*	Identification	Raw Count	Concentration (s/m^3)*	Analytical Sensitivity (s/m^3)*
Alternaria	7	300	43	Ascospores, non-specified	7	300	43
Aspergillus/Penicillium-like	30	1,300	43	Basidiospores, non-specified	12	510	43
Cercospora	4	170	43	Cladosporium	>100	>8,500	85
Curvularia	2	85	43	Fusarium	4	170	43
Myxomycetes/Periconia/Smut/Rust	2	85	43	Nigrospora	4	170	43
Pithomyces	2	85	43	Yeast-like fungi	2	85	43
Hyphal Fragments	6	260	43				
Total Fungal Structures/m^3*: >12,000							

Non-Microbial Debris Field Rating



Relative Mold Type Concentration

Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 9/4/2025 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111919 | Technician: Steven Reese

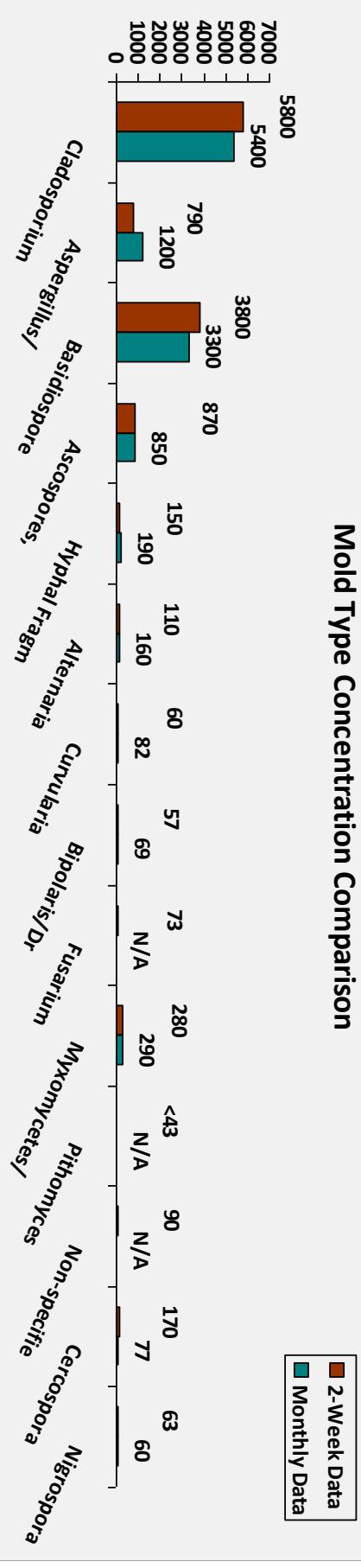
If a structure is not listed, it was not observed in the sample(s) submitted. Debris rating estimates the total non-fungal particle load on the sample. Ratings of Non Detected, Trace (>0 to 5%), Light (>5% to 25%), Moderate (>25% to 75%), Heavy (>75% to 90%), and Occluded (>90%) are used. A rating of Light or higher may have a higher number of structures present than indicated. The higher the rating, the greater the negative bias. A rating of Occluded makes quantitative results impossible: any structures detected will be marked as Detected. Concentrations are rounded to two significant figures. The 'total' field may not add up to the sum of individual types due to this rounding. The maximum raw count is 100 due to stopping rules. The calculated concentration for a 100 raw count sample will vary depending on the traverse in which the stopping rule was applied. Sample volumes are provided by the customer and impact the validity of structure concentrations. * s/m^3 is structures/ m^3 . A structure is the analyte of interest chosen by the client. **Refers to percent of sample in which structures are enumerated. If you have any questions regarding count rules, please call the lab. Samples received and analyzed by Moldlab, Ltd. LAB0137 by the Texas Dept. of Licensing and Regulation. AIHA LAP, LLC EMLAP Accredited ID No. 154782.



flashback

2-Week Average Outdoor Data		September Historical Average Outdoor Data	
Identification	Concentration (s/m³)	Identification	Concentration (s/m³)
Alternaria	110	Alternaria	160
Ascospores, non-specified	870	Ascospores, non-specified	850
Aspergillus/Penicillium-like	790	Aspergillus/Penicillium-like	1,200
Basidiospores, non-specified	3,800	Basidiospores, non-specified	3,300
Bipolaris/Drechslera/Helminthosporium/Exserohilum	57	Bipolaris/Drechslera/Helminthosporium/Exserohilum	69
Cercospora	170	Cercospora	77
Cladosporium	5,800	Cladosporium	5,400
Curvularia	60	Curvularia	82
Fusarium	73	Fusarium	190
Hyphal Fragments	150	Hyphal Fragments	290
Myxomycetes/Periconia/Smut/Rust	280	Myxomycetes/Periconia/Smut/Rust	60
Nigrospora	63	Nigrospora	
Non-specified spore	90		
Pithomyces	<43		

Mold Type Concentration Comparison



Report Date: 9/5/2025 | Sample Date: 9/4/2025

2-Week average Outdoor Data is from 8/21/2025 - 9/4/2025. September Historical Average Outdoor Data is the mean Calculated Concentration for outdoor samples from selected clients from selected zip codes considered by MoldLab to be part of the DFW area. Contact the lab for a complete list of zip codes. Data may not be applicable to areas outside of these zip codes. Outdoor data begins in 2015 and ends in 2024, and is exclusive to the month listed. This report is not intended as a replacement for an outdoor reference sample. Mold types that were not listed in the historical average outdoor data were not detected, or were detected at a level <22 spores/m³. Mold types that were not listed in the historical average outdoor data were not detected, or were detected at a level <43 spores/m³. No correction for statistical significance or uncertainty of measurement has been applied. Mold Types listed as "N/A" in the Mold Type Concentration Comparison chart were not detected at a statistically significant level. MoldLab assumes no responsibility for sample collection or handling prior to receipt at the laboratory. This report does not express or imply interpretation of the results contained herein in LA0137 by the Texas Dept. of Licensing and Regulation.

PROJECT INFORMATION

Weinstein-090425

220 E Broadway Ave #2145

Fort Worth, Texas 76104

Project No.: Not Provided

Test Code 1: Spore Trap -fungal|limited
Analysis Method: ASTM Designation D7391-17 (Modified)

STE 800
Dallas, Texas 75231

This test report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ.

*** Diagnosis of health effects should be left to a medical professional. Moldlab is not a clinical laboratory and does not have medical professionals on staff.

Health effects in general are not well studied, and dosage, exposure, and sensitivity thresholds are not well known and can potentially vary tremendously depending on various conditions and on the particular individual. Effects can also vary from species to species within a particular mold genus. The EPA, OSHA, NIOSH and other occupational health related associations in the U.S. have not yet established permissible exposure levels (PEL), recommended exposure limits (REL), or other limit values for aerallergens.

Please realize that the evaluation of one's specific results in terms of potential health hazards and subsequent courses of action are beyond the scope of the laboratory analysis.

Pictures / images are for *illustration* purposes only and are NOT of the samples tested.

Terminology:

Allergen- the most common effect, and can range from hay fever and asthma, to a very particular reaction in certain organs or tissues.

Contaminant- something that is present without injuring or benefiting the host; does not cause infection.

Opportunistic pathogen- Causes infection only when the weak or injured condition of the person gives the agent opportunity to infect; rarely infect persons who are otherwise healthy.

Definition	Images
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Alternaria (all-tur-nair'ee-uh)

Classification: Common Allergen / Contaminant / Opportunistic Pathogen (rarely)

Possible Health Effect: It is an important allergen and common agent of hay fever, asthma, and other allergy related symptoms, including sinusitis.

Macroscopic Morphology: The mold can appear gray / white at first than become greenish / black or brown with a lighter border over time.

Environment: Soil, Plants, Commonly found indoors on food and textiles.

Ascospores, non-specified (ass-co'-spores)

Classification: These are a very large category of spores.

Possible Health Effect: Because so few of the Ascomycetes will grow in the laboratory setting, very little is known about their health effects on humans.

Macroscopic Morphology: Most will appear as specks or spots or bumps on leaves and wood.

Environment: Leaves, Wood. Also, most are plant saprophytes playing the role of "recyclers". Spores are produced in sac-like structures called asci.



(972) 945-6653
10440 N Central Expressway
STE 800
Dallas, Texas 75231

Tech Notes:

Definition

Images

Aspergillus/Penicillium-like (as-per-jill-us) / (pen-uh-sill'ee-um)

Classification: Allergen / Contaminant / Opportunistic Pathogen

Possible Health Effect: Aspergillus is common on tape lift samples and air samples, but its spores are indistinguishable from Penicillium spores in most cases. There are a few exceptions, but the species ID must be made from culture, and is still a difficult job. Health effects vary by species, but many are listed as allergens. Some species can produce toxins that may have significant health effects in humans. Aspergillus is listed as one of the most infectious types of mold, but infections are not common in normal healthy immune systems. However, if you are immune suppressed or compromised this should be discussed with your physician.

Macroscopic Morphology: Aspergillus can appear in a wide range of colors from white to purple, yellow to green, see images next to text.

Environment: Commonly found in the environment around the world.

Basidiospores, non-specified (ba-sid-ee-oh'-spores)

Classification: Allergen / Contaminant. Another large general class of spores formed on a structure called a basidium, mushrooms belong to this group.

Possible Health Effect: Allergen and possible poisoning if certain species are ingested.

Macroscopic Morphology: Mushrooms, puffballs and bracket fungi.

Environment: This category of spores is found in the outdoor air make up. This is a common cause of Wood Rot. High concentrations in an indoor air sample might be indicative of water damage or too high humidity. Often abundant at night or pre-dawn hours when there is high humidity.

Bipolaris/Dreschlera/Helminthosporium/Exserohilum types (by-e-pole-air-us)(dresh-lair'-uh) /

Classification: Contaminant / Opportunistic pathogen

Possible Health Effect: Allergenic and the most common agent for allergic fungal sinusitis. Various but uncommon infections of the eye, nose, lungs and skin in debilitated hosts.

Macroscopic Morphology: The mold will appear brownish / black with a black matted middle and a raised lighter color periphery.

Environment: The fungus is a saprophyte and can be found in soil.

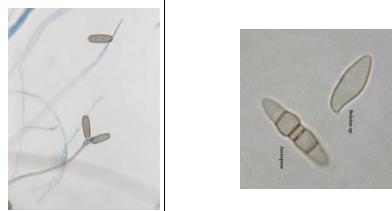
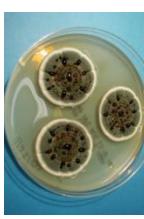
Cercospora group (sir-ko-spore-'ra)

Classification: Contaminant / Plant Pathogen

Possible Health Effect: None found at this time

Macroscopic Morphology: reddish-brown to gray-black/woolly

Environment: Plants -cause of leaf spot on sugar beets



Tech Notes:

Definition	Images
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Chaetomium (kay-toe-me-um)

Possible Health Effect: Rarely involved in systemic and cutaneous disease and sometimes reported to be allergenic. Some species can produce toxins, and there is some research interest on whether these toxins can cause cancer.

Macroscopic Morphology: The surface of the mold is cottony, spreading and becomes tan or gray with age. With close examination the surface sometimes will appear to have little black specks like pepper.

Environment: Chaetomium is one of the few Ascomycetes that will grow and produce spores indoors. It prefers to grow on cellulose for example paper and wood. Primary IAQ importance is that it will grow in the same conditions as Stachybotrys (wet cellulose) and sheetrock paper. Colonies of Chaetomium and Stachybotrys will be growing on top of one another. Also, found in soil and hay.

Cladosporium (clad-oh-spore-ee-um)

Classification: Common Allergen/ Contaminant

Possible Health Effect: Rarely pathogenic, it is a common agent of hay fever and asthma and other allergy related symptoms.

Macroscopic Morphology: Surface of the mold is greenish brown or can appear black in color with age and have heap or folded appearance.

Environment: Cladosporium can be found in most air samples most of the time. It is very common. Cladosporium is one of the types of mold found growing on HVAC vent covers and grills. It can grow on leaves, textiles, wood, paper, and decaying vegetation.



Cladosporium sp.

Curvularia (curve-you-lair'-ee-uh)

Classification: Contaminant / Opportunistic Pathogen

Possible Health Effect: Some sources site it as an allergen. Rare infections of the cornea, nail and sinuses primarily in immunocompromised individuals.

Macroscopic Morphology: The mold appears as olive green to brown or black with a pink wooly surface.

Environment: The mold is common in the air and in the soil as a saprophyte and in textiles and decaying vegetation.



Curvularia sp.

Fusarium (few-sahr-ee-um)

Classification: Contaminant / Opportunistic pathogen

Possible Health Effect: Associated with eye infections and occasionally skin and nail. Produces a variety of toxins mainly important when ingested particularly through contaminated grain products. Reports of infections in burn victims and compromised hosts.

Macroscopic Morphology: It grows quickly and is at first white and cottony but will turn pinkish with age.

Environment: Found on fruit and grains and common in soil. Indoors it can sometimes contaminate humidifiers.



Tech Notes:

Definition	Images
Hyphal Fragments (hy-full)	
Classification: N/A	
Possible Health Effect: N/A	
Macroscopic Morphology: Not a type of mold. A hyphal fragment is a small piece or portion of 'root'-like structure called hyphae/mycelia. Hyphal fragments are common in air samples. Mold type cannot be identified by the hyphae alone.	
Environment: N/A	
Mixomycete / Periconia / Smut (mix-oh'-my-seat) / (pare-i-con-e-ee-uh) / (smut)	
Classification: Generally a plant pathogen	
Possible Health Effect: Generally plant pathogens. Some allergenic properties have been reported but generally pose no health concerns to humans.	
Macroscopic Morphology: N/A	
Environment: This group is associated with living and decaying plants as well as decaying wood. Sometimes can be found indoors.	
*myxomycete is technically not a mold but we have included it in this group due to morphological similarities.	
Nitsospora (nih-grow-spore-uh)	
Classification: Saprophyte, not known to be pathogenic.	
Possible Health Effect: Rarely Reported	
Macroscopic Morphology: Wooly, white then gray with age.	
Environment: Worldwide in soil, parasitic and saprophytic on plants.	
Pithomyces (pith-oh-mycees)	
Classification: Contaminant	
Possible Health Effect: No reports of allergies or infections.	
Macroscopic Morphology: Light to dark brown and cottony, sometimes showing tufts of distinct fluff in the middle of colony.	
Environment: Worldwide, soil, plant materials, saprophyte, rarely found indoor, but can grow on paper.	
Yeast-like fungi	
Classification: This is a category we assign to spores that have morphological characteristics similar to yeast. Examples of yeast like mold are Acremonium and Exophiala	
Tech Notes:	
Submitted By: Dayna Boor via: Hand Delivered Submittal Date: 9/9/2025 13:13 Sample Date: 9/4/2025 Analysis Date: 9/5/2025 Report Date: 9/5/2025 Lab Job No.: 25-111919 Technician: Steven Reese	
Results apply only to samples tested. Results may not be reported or reproduced except in full without written permission from Moldlab. All samples were received in acceptable condition unless noted in the Tech Notes section. Field blank correction of results is not applied. Moldlab assumes no responsibility for sample collection or handling prior to receipt at the laboratory. This report does not express or imply interpretation of the results contained herein. Samples received and analyzed by Moldlab, Ltd. LAB0137 by the Texas Dept. of Licensing and Regulation, AIHA LAP, LLC EMLAP Accredited ID No. 154782. Report Approved by Kristina Rucker.	
Page 4 4	

PROJECT INFORMATION

Weinstein-090425

220 E Broadway Ave #2145

Fort Worth, Texas 76104

Project No.: Not Provided

Air Exam FAQ

Test Code 1: Spore Trap-fungal limited

Analysis Method: ASTM Designation D7391-17 (Modified)


**DALLAS MOLD
CONSULTANTS**
(972) 945-6653
10440 N Central Expressway
STE 800
Dallas, Texas 75231

This test report contains the following sections: Cover Letter, Snapshot, Report, Flashback, Glossary, and FAQ.

How do I know if the air sample results are normal?

The general guideline is that the concentration and types of mold in the inside sample should be similar to or lower than the concentration in the Outside sample. Currently there are no dose response relationship statistics for allowable or safe levels of aeroallergens.

What is the Air Calculated Concentration?

The Calculated Concentration is a measure of the concentration of mold spores in the air, and is listed as spores per cubic meter of air. It is useful for comparing samples and understanding how many spores are in a given section of air. This is calculated based on the air flow rate of the pump, the time the pump was run for, the proportion of the sample enumerated, and the raw count. It is calculated as $((100/\text{Proportion of Sample Analyzed}) / (\text{Air Flow Rate} * \text{Pump Run Time})) * (\text{Raw Count})$. This number is then rounded to two significant figures. The calculated concentration is useful for comparing samples with different volumes, sample types, and counting methods. It is also useful for understanding how many spores there are in a given section of air. If you believe that the air flow rate and pump run time may be incorrect for some or all of your samples, please contact the lab and we can correct this for you.

The 'raw' count is how many spores the technician actually viewed on your sample while looking through the microscope. We use this number to generate the calculated concentration. Moldlab stops counting spores at 100 and reports the raw count as >100'.

Can you tell me a little more about mold air samples?

This type of sample is a non-cultured air sample, which means the lab did not grow the samples in a Petri dish, and is commonly referred to as a "snapshot" of the air at the exact time of sampling. The test works by pumping a controlled volume of air through a collection container called a spore trap. The spore trap has a sticky substance on its surface which captures any particles from the air, including mold spores. Test results account for both live and dead spores.

What is the 'debris field rating'?

The 'debris field rating' is a visual estimate made by the technician of how much non-fungal debris there is on the sample. The rating includes all non fungal particulate (fibers, debris, pollen, insects, skin, etc.). The scale includes ratings of 'None Detected', 'Trace', 'Minor', 'Moderate', 'Heavy', and 'Occluded'. None Detected indicates no sample was detected on the sample (possibly due to a bad sample). Trace indicates trace amounts of debris are present. Minor indicates small amounts of debris are present. Moderate indicates an average amount of debris is present. Heavy indicates a high concentration of debris articulate. Lastly, Occluded indicates the amount of particulate on the sample is so concentrated that the technician could not see through it to count and identify spores accurately. The higher the debris rating, the greater the negative bias of results.

What is a 'significant figure'?

Significant figures are used in science to give a better representation of the accuracy of a number. All non-zero digits in a number are significant. Additionally, any digits to the right of a decimal are significant, whether they are zero or not, and all digits in between two non-zero digits are also significant. Significant figures give an understanding of what decimal place a number is accurate to. For example, if 43 is given as 43.0, it is assumed that the "true" value is somewhere between 42.95 and 43.049. If it is given as 43.00, it is assumed the "true" value is somewhere between 42.995 and 43.0049, which is much more precise. Similarly, if 431 is shown as 431, it is assumed that the analysis is accurate to between 430.5 and 431.49, while if it is given as 430, it is only assumed to be accurate to between 425 and 434.9. In this report, all calculated numbers such as the minimum reporting limit and the calculated concentration are rounded to two significant figures. All numbers that were not calculated are given without rounding.

What is the 'minimum reporting limit'?

A minimum reporting limit is exactly what it sounds like- the minimum number that must be reported for the calculated concentration if any spores are detected. This is calculated as $(100/\text{Proportion of Sample Analyzed}) / (\text{Air Flow Rate} * \text{Pump Run Time})$. This number is essentially the amount a single spore increases the calculated concentration by. All spore types that are not listed as having a raw count of 1 or greater have a calculated concentration of less than the minimum reporting limit. It cannot be said based upon a raw count of zero that the true concentration of that spore type is 0, however, because the testing procedure is not sufficiently precise. For this reason, the minimum reporting limit gives a useful measure of the minimum detectable concentration of mold types. Bear in mind that any negative bias due to the debris field rating IS NOT accounted for in this minimum reporting limit.

Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 9/9/2025 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111919 | Technician: Steven Reese

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LAB0137 by the Texas Dept. of Licensing and Regulation, AIHA LAP, LLC EMLAP Accredited ID No. 154782. Report Approved by Kristina Rucker.

PROJECT INFORMATION

Weinstein - 090225
220 E Broadway Ave. #2145
Fort Worth, Texas 76104
Project No.: Not Provided

This test report contains the following sections: Cover, Report, FAQ, and Glossary

Direct Exam Chain of Custody

Test Code 3: Direct Exam -fungal limited
Analysis Method: Internal SOP M-3

DALLAS MOLD CONSULTANTS
(972) 945-6653
10440 N Central Expressway STE 800
Dallas, Texas 75231

Company name	Dallas Mold Consultants			State	TX	Zip	75206	Moldlab
Address	8080 N. Central Expwy Ste 1700 City Dallas			FM-17 External 20 Line e Chain of Custody Form				
Project name	Weinstein - 090225			Submitted By Dayna Boor				
Project address	220 E Broadway Ave. Ft. Worth, TX			Cell phone 214-606-1330				
Project#(optional)				Email address: dayna@dallasmoldconsultants.com				
Sample Date	10/17/2025	3HR	6HR	24HR	48HR	3DAY	5DAY	CC:
	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Test Codes	Air Samples	MOLD				ASBESTOS		
Sample # or ID	1. Open tape mold only 2. Open tape mold & other particle	3. Tape/mold/both mold only strings	4. Tape/mold/both mold & other particle strings	5. Tape/mold only - vial ²	6. Specimens mold & other particles - vial ²	7. Firm	8. End point count	
1. 090225-01	Entry Drywall	79	58	3	Time on (specimens to air samples only)	Time off (specimens to air samples only)	Total (vial Aborigines, etc.)	
2.							≤ 4.9.6 /	
3.								
4.								
5.								
6.								
7.								
8.								
9.								
10.								
Payment options	<input checked="" type="radio"/> Invoice to account <input type="radio"/> Precess credit card on file <input type="radio"/> Enclosed check	Released by (your signature) <i>Dayna Boor</i>	Received Date Stamp: RECEIVED BY C.A. OCT 17 2025					
Field Notes:								
Special Instructions:								
Tracking #:	25-113841							
Rev. 7, Issue Date: 3/24/2022	2501 Mayes Rd. Ste. #110 Carrollton, TX 75006 info@moldlab.com 1-866-416-6653							
	Page ____ of ____							

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 10/17/2025 | Sample Date: 10/17/2025 | Analysis Date: 10/18/2025 | Report Date: 10/18/2025 | Lab Job No.: 25-113841 | Technician: Deisy Regalado

Results apply only to samples as received and tested. Results may not be reported or reproduced except in full without written approval of Moldlab. All samples were received in acceptable condition unless noted in the Tech Notes section. Field blank correction of results is not applied. An estimate of measurement uncertainty is provided upon request. Moldlab assumes no responsibility for sample collection or handling prior to receipt at the laboratory. This report does not express or imply interpretation of the results contained herein. LAB0137 by the Texas Dept. of Licensing and Regulation. AIHA LAP, LLC EMLAP Accredited ID No. 154782. Report Approved by Kristina Rucker

Approved by:



Kristina Rucker, Lab Director



moldlab
MICROBIOLOGY LABS
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Website - www.moldlab.com

Lab ID #: 154782

PROJECT INFORMATION

Weinstein - 090225
220 E Broadway Ave. #2145
Fort Worth, Texas 76104
Project No.: Not Provided

This test report contains the following sections: Cover, Report, FAQ, and Glossary

Report

Test Code 3 : Direct Exam -fungal limited
Analysis Method: Internal SOP M-3


**DALLAS MOLD
CONSULTANTS**
(972) 945-6653
10440 N Central Expressway STE 800
Dallas, Texas 75231

Sample No:	101725-01	Analysis Date:	10/18/2025	Sample Type:	Swab
Location:	Entry Drywall				

	Identification	Rating
Alternaria		Minor
Ascospores, non-specified		Minor
Bipolaris/Dreschslera/Helminthosporium/Exserohilum		Minor
Curvularia		Minor
Myxomycetes/Periconia/Smut/Rust		Minor
Nigrospora		Minor
Non-specified spore		Minor
Pithomyces		Minor
Hyphal Fragments	Minor	

Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 10/17/2025 | Sample Date: 10/17/2025 | Analysis Date: 10/18/2025 | Report Date: 10/18/2025 | Lab Job No.: 25-13841 | Technician: Desy Regalado

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PROJECT INFORMATION

Weinstein - 090225
220 E Broadway Ave. #2145
Fort Worth, Texas 76104
Project No.: Not Provided

This test report contains the following sections: Cover, Report, FAQ, and Glossary

Direct Exam FAQ

Test Code 3: Direct Exam -fungal limited
Analysis Method: Internal SOP M-3



DALLAS MOLD CONSULTANTS
(972) 945-6653
10440 N Central Expressway STE 800
Dallas, Texas 75231

What does the rating system mean?

Mold is a normal part of our environment, and mold spores can settle out of the air into accumulated dust. This can cause 'minor' ratings of several different types of mold to appear even in a typical house dust sample, and these may not necessarily be a cause for concern. However, a 'heavy' rating may indicate that the sample was taken from a source of mold. Below are the exact criteria for each rating:

- 'No mold detected' means that the sample submitted did **not** contain a detectable level of mold.
- 'Minor' means that the technician observed 1 or fewer structures of mold per field of view under the microscope.
- 'Moderate' means 1 to 3 structures of mold were detected per field of view.
- 'Heavy' means greater than 3 structures were detected per field of view.

Always take into consideration the sample as a whole when interpreting results. It is important to also consider the types of mold detected and the location the sample was taken.

How do I learn more about the types of mold listed on my report?

Each report comes with its own mold dictionary, called the Glossary. Simply scroll to the Glossary section of your report and each mold type is listed alphabetically. There you'll find helpful information about each mold type.

Do I have the Black Mold?

How do I get rid of it?

Many molds are allergens and some may be toxicogenic. Disturbing the mold with cleaning methods increases the chances of exposure to the particulate. Mold clean up and disposal methods vary greatly from company to company. A good rule of thumb is that if the contaminated area is small and the material is non porous, such as metal, it can be cleaned by traditional methods, taking care to use personal protective equipment. Porous materials on the other hand, such as wood, textiles, or sheetrock, are difficult to clean because of the microscopic holes in the material. The 'root-like' structures of the mold called hyphae/mycelia can grow down into the holes and make it hard to clean effectively. The surface will appear clean but as soon as conditions are favorable the mold can start to grow again. Here is a link to the EPA mold help guide: <https://www.epa.gov/mold/brief-guide-mold-moisture-and-your-home>

Can we still live here?

There are no established 'safe' levels of mold, just as there are no established unsafe' levels of mold, and individuals have different resistances and reactions to mold. Persons that are most likely to be adversely affected by mold exposure are: children, elderly, immunocompromised, and persons with respiratory disorders. If you suspect you are experiencing adverse health effects as a result of mold, please consult a medical professional. Please note that Moldlab, Ltd is not a medical, or clinical laboratory and we do not offer medical consulting or advice.

Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 1/17/2025 12:16 | Sample Date: 10/17/2025 | Analysis Date: 10/18/2025 | Report Date: 10/18/2025 | Lab Job No.: 25-13841 | Technician: Desy Regalado

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Page 1 | 1
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PROJECT INFORMATION

Weinstein - 090225

220 E Broadway Ave. #2145

Fort Worth, Texas 76104

Project No.: Not Provided

This test report contains the following sections: Cover, Report, FAQ, and Glossary

***Diagnosis of health effects should be left to a medical professional. Moldlab is not a clinical laboratory and does not have medical professionals on staff.

Health effects in general are not well studied, and dosage, exposure, and sensitivity thresholds are not well known and can potentially vary tremendously depending on various conditions and on the particular individual. Effects can also vary from species to species within a particular mold genus. The EPA, OSHA, NIOSH and other occupational health related associations in the U.S. have not yet established permissible exposure levels (PEL), recommended exposure limits (REL), or other limit values for aerodollergens.

Please realize that the evaluation of one's specific results in terms of potential health hazards and subsequent courses of action are beyond the scope of the laboratory analysis.

Pictures / images are for *illustration* purposes only and are NOT of the samples tested.

Terminology:

Allergen- the most common effect, and can range from hay fever and asthma, to a very particular reaction in certain organs or tissues.

Contaminant- something that is present without injuring or benefiting the host; does not cause infection.

Opportunistic pathogen- Causes infection only when the weak or injured condition of the person gives the agent opportunity to infect; rarely infect persons who are otherwise healthy.

Definition

***Alternaria* (al'-tur-nair'-ee-uh)**

Classification: Common Allergen / Contaminant / Opportunistic Pathogen (rarely)

Possible Health Effect: It is an important allergen and common agent of hay fever, asthma, and other allergy related symptoms, including sinusitis.

Macroscopic Morphology: The mold can appear gray / white at first than become greenish / black or brown with a lighter border over time.

Environment: Soil, Plants, Commonly found indoors on food and textiles.

Images



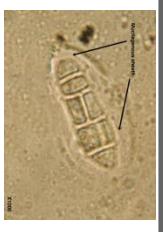
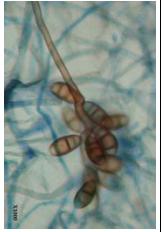
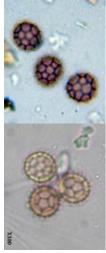
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Direct Exam Glossary

Test Code 3: Direct Exam-fungal limited
Analysis Method: Internal SOP M-3

Tech Notes:

Submitted By: Dayna Boor | via Hand Delivered | Submittal Date: 1/17/2025 12:16 | Sample Date: 10/17/2025 | Analysis Date: 10/18/2025 | Report Date: 10/18/2025 | Lab Job No.: 25-113841 | Technician: Daisy Regalado

Definition	Images
<p>Ascospores, non-specified (ass-co'-spores)</p> <p>Classification: These are a very large category of spores.</p> <p>Possible Health Effect: Because so few of the Ascomycetes will grow in the laboratory setting, very little is known about their health effects on humans.</p> <p>Macroscopic Morphology: Most will appear as specks or spots or bumps on leaves and wood.</p> <p>Environment: Leaves, Wood. Also, most are plant saprophytes playing the role of "recyclers". Spores are produced in sac-like structures called ascii.</p>	 
<p>Bipolaris/Dreschlera/Helminthosporium/Exserohilum types (bye-pole-air-us)(dresh-lair'-uh)/</p> <p>Classification: Contaminant / Opportunistic pathogen</p> <p>Possible Health Effect: Allergenic and the most common agent for allergic fungal sinusitis. Various but uncommon infections of the eye, nose, lungs and skin in debilitated hosts.</p> <p>Macroscopic Morphology: The mold will appear brownish / black with a black matted middle and a raised lighter color periphery.</p> <p>Environment: The fungus is a saprophyte and can be found in soil.</p>	
<p>Cyrenaria (curve-yoo-lair'-ee-uh)</p> <p>Classification: Contaminant / Opportunistic Pathogen</p> <p>Possible Health Effect: Some sources site it as an allergen. Rare infections of the cornea, nail and sinuses primarily in immunocompromised individuals.</p> <p>Macroscopic Morphology: The mold appears as olive green to brown or black with a pink wooly surface.</p> <p>Environment: The mold is common in the air and in the soil as a saprophyte and in textiles and decaying vegetation.</p>	 
<p>Hyphal Fragments (hy-full)</p> <p>Classification: N/A</p> <p>Possible Health Effect: N/A</p> <p>Macroscopic Morphology: Not a type of mold. A hyphal fragment is a small piece or portion of 'root'-like structure called hyphae/mycelia. Hyphal fragments are common in air samples. Mold type cannot be identified by the hyphae alone.</p> <p>Environment: N/A</p>	 
<p>Myxomycete / Periconia / Smut (mix-oh'-my-seat) / (pare-i-cone-ee-uh) / (smut)</p> <p>Classification: Generally a plant pathogen</p> <p>Possible Health Effect: Generally plant pathogens. Some allergenic properties have been reported but generally pose no health concerns to humans.</p> <p>Macroscopic Morphology: N/A</p> <p>Environment: This group is associated with living and decaying plants as well as decaying wood. Sometimes can be found indoors.</p> <p>*myxomycete is technically not a mold but we have included it in this group due to morphological similarities.</p>	 

Tech Notes:

Definition	Images
------------	--------

Nigrospora (nigh-grow-spore-uh)

Classification: Saprophyte, not known to be pathogenic.

Possible Health Effect: Rarely Reported

Macroscopic Morphology: Wooly, white then gray with age.

Environment: Worldwide in soil, parasitic and saprophytic on plants.



Non-specified spore

The spore is NOT Stachybotrys, and could not be identified as any of the other mold types this lab identifies. It may be an unusual mold type that is not identifiable microscopically, or the spore may be damaged. However, the spore was definitely fungal.

Classification: N/A

Macroscopic Morphology: N/A

Environment: N/A

Pythomyces (pith-oh-my-cess)

Classification: Contaminant

Possible Health Effect: No reports of allergies or infections.

Macroscopic Morphology: Light to dark brown and cottony, sometimes showing tufts of distinct fluff in the middle of colony.

Environment: Worldwide, soil, plant materials, saprophyte, rarely found indoor, but can grow on paper.



Tech Notes:

Submitted By: Dayna Boor | via Hand Delivered | Submittal Date: 10/19/2025 12:16 | Sample Date: 10/17/2025 | Analysis Date: 10/28/2025 | Report Date: 10/29/2025 | Lab Job No.: 25-13841 | Technician: Delsy Regalado

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MOLD REMEDIATION PROTOCOL

**Project No: Weinstein-090225
Inspection Date: 09/02/2025
Remediation Protocol Date:
09/08/2025**

Prepared By:

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Written By:

Dayna Boor

Licensed Mold Assessment Consultant - TDLR # MAC1687, Exp. 02/27/2026
Licensed Mold Remediation Contractor - TDLR # MRC1602, Exp. 04/02/2027

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Section 1.0 Project Background

1.1 Site Description

Building Type: Residential, Multi-Family, Apartment, 1st Floor, Slab Foundation

Age: 2019

Scope: Demolition, Content Cleaning, Environmental Cleaning, HVAC System and Duct Cleaning

1.2 Initial Observations and Findings

Clients requested a mold inspection and remediation protocol write-up after a water loss related to the HVAC condensation drain line caused water damage to the mechanical closet and guest bedroom of this unit.

At the time of inspection the humidity is ~63% Rh and there is visible growth on the inside of the utility closet, behind baseboard in the hallway, and behind baseboard in the guest bedroom behind the utility closet.

The laminate flooring surrounding the area has elevated moisture readings.

Remediation workers put up some containment. There is no equipment on site and no negative pressure on the containment.

Air samples were collected in the mechanical closet hallway, guest bedroom, living room, and master bedroom for comparison with an outdoor air sample.

Tape lift samples were collected from visible growth on the drywall in the hallway and in the guest bedroom for lab analysis.

FINDINGS and RECOMMENDATIONS:

The indoor air samples show contamination with *Aspergillus* and *Chaetomium* mold spores throughout the apartment. *Chaetomium* mold is associated with long-term water damage on building materials.

Due to elevated molds in the air samples, all contents in the apartment should be considered contaminated.

See lab results on next page.

See pictures on pages 12-14.

Recommending mold remediation, content cleaning, environmental cleaning, and HVAC cleaning as outlined in this protocol on **pages 7-11**.

STATE NOTIFICATION

The material to be removed and cleaned is greater than 25 square feet which requires state notification and a 5-day waiting period before remediation can begin. The total of all material removal specified in this protocol is based on areas of visible mold growth, elevated moisture levels, and visible water damaged material observed during the mold inspection performed on 09/02/2025.

Section 1.3

Initial Microbial Sampling Results

Air samples collected using Zefon Bio-Pump with Air-O-Cell cassette at a flow rate of 15 LPM.

Baseline outdoor sample collected and indoor air samples collected in the mechanical closet hallway, guest bedroom, living room, and master bedroom.

Surface tape lift samples collected from visible growth in the hallway and in the guest bedroom behind the baseboards.

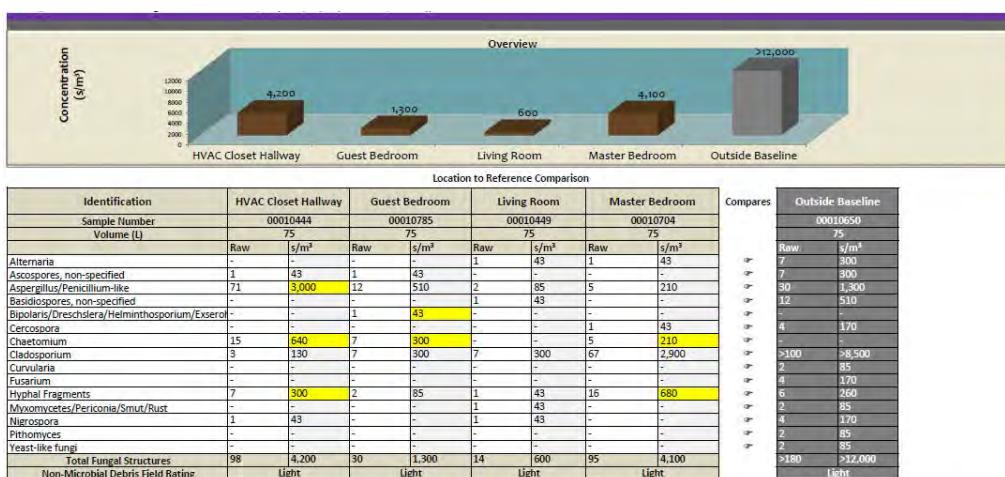
RESULTS: The indoor air samples identified elevated *Aspergillus* mold spores in the mechanical closet hallway and the presence of *Chaetomium* mold spores in the hallway, guest bedroom, and master bedroom air samples.

The tape lift sample from the drywall in the guest bedroom identified a **heavy concentration** of *Chaetomium* mold spores and a **minor concentration** of *Aspergillus* and *Cladosporium* mold spores.

The tape lift sample from the drywall in the utility closet hallway identified a **heavy concentration** of *Chaetomium* mold spores.

See Lab Snapshots below and Full Lab Reports for more information

Air Samples



Surface Tape Lift Samples

Sample No:	090425-01	Analysis Date:	9/5/2025	Sample Type:	Tape /Bio-tape
Location:	Guest Bedroom Tape Lift	<u>Identification</u>			
<u>Rating</u>					
	Aspergillus/Penicillium-like	Minor	Medium	Heavy	
	Chaetomium	Minor	Medium	Heavy	
	Cladosporium	Minor	Medium	Heavy	
	Hyphal Fragments	Minor	Medium	Heavy	
Sample No:	090425-02	Analysis Date:	9/5/2025	Sample Type:	Tape /Bio-tape
Location:	HVAC Closet Drywall Tape Lift	<u>Identification</u>			
<u>Rating</u>					
	Chaetomium	Minor	Medium	Heavy	
	Hyphal Fragments	Minor	Medium	Heavy	

Sample collection and analyses were performed according to Minimum Work Practices and Procedures for Mold Assessment of the Texas Mold Assessment and Remediation Rules. Microbial samples collected by Dallas Mold Consultants are submitted under chain of custody to The Moldlab, a Texas licensed lab (TDSHS license #LAB0137). If samples were collected, full lab report will be sent as a separate attachment.

Section 1.4

Reliance

This protocol is for the exclusive use of the client for the project being discussed. This protocol is not a certificate, assurance, warranty or guarantee of future conditions or performance, but is specific to the conditions present and detected on the date of the mold inspection. This protocol is valid for 60 days from the day it was written.

The Texas Department of Licensing and Regulation regulates mold remediation in the state by administering the Texas Mold Assessors and Remediaters Occupations Code and Administrative Rules. Additional information regarding the Texas Mold Program and the state mold statute can be found on their homepage at www.tdlr.texas.gov/mld/mld.htm.

Anyone who believes a company or individual has violated the rules can file a complaint with TDLR. For information on this process, call 1-800-803-9202, or complete the online complaint form.

Texas Department of Licensing and Regulation

Enforcement Division

P.O. Box 12157

Austin, TX 78711

enforcement@tdlr.texas.gov

www.tdlr.texas.gov/complaints

Section 2.0

Regulations and Notices

2.1 Texas Mold Assessment and Remediation Regulations

It is critical that licensed, trained, and qualified mold remediation professionals perform the clean-up work. Mold Remediation should be performed to the standards found in IICRC S520, Standard and Reference Guide for Mold Remediation, and in accordance with the laws of the state of Texas. In accordance with the Texas Mold Assessment and Remediation Rules (Rules), 16 Tex. Admin. Code, Chapter 78, if a licensed Remediation Contractor is doing the mold remediation, a Mold Remediation Protocol is required.

According to the Texas Department of Licensing and Regulation (TDLR) Texas Mold Assessors and Remediators Administrative Rules, state notification is required if more than 25 contiguous square feet of mold contaminated material is affected in any one area. This notification requires a five (5) business day waiting period between the notification date and the remediation start date. This client is encouraged to work with a licensed Mold Remediation Contractor to ensure minimal project disruption and down time should this remediation effort exceed the state mandated limits and have to be registered.

Contaminated materials should be removed using appropriate containment and removal practices in accordance with the TMARR. Proper engineering controls must be in place to prevent the further spreading of airborne mold spores.

2.2 TAHPR - Texas Asbestos Health Protection Rules

The current Texas Asbestos Health Protection Rules require that an asbestos survey be performed by Department of State Health Services licensed persons prior to the commencement of renovation or demolition activities that could disturb asbestos-containing materials within a public building. Materials such as drywall, drywall texture and joint compound, ceiling texture/acoustical materials, flooring materials, ceiling tiles, as well as vinyl flooring products and adhesives can contain asbestos.

2.3 Lead Based Paint

Pre-renovation education requirements:

Firms that perform renovations for compensation in residential houses, apartments, and child-occupied facilities built before 1978 are required to distribute EPA's lead hazard information pamphlet "Renovate Right" before starting renovation work.

The firm must document compliance with this requirement; EPA's pre-renovation disclosure form may be used for this purpose.

Training, certification, and work practice requirements:

Firms are required to be certified, their employees must be trained in the use of lead-safe work practices (either as a certified renovator or on-the-job by a certified renovator), and lead-safe work practices that minimize occupants' exposure to lead hazards must be followed.

Examples of lead-safe work practices include:

Work-area containment to prevent dust and debris from leaving the work area.

Prohibition of certain work practices like open-flame burning and the use of power tools without HEPA exhaust control.

Thorough clean up followed by a verification procedure to minimize exposure to lead-based paint hazards.

Section 3.0 Containments and PPE

Section 3.1 Containment

Pack-out contents for cleaning. Build a single-stage containment around the affected walls in the bedroom, living room, mechanical closet, and hallway. Establish negative pressure using air scrubbers with CLEAN HEPA-rated filters. **Vent outside through a window to remove organic vapors.**

Place air scrubbers outside the containment to clean up contamination from scattered mold spores.

Maintain 4 air changes per hour.

Utilize dehumidifiers to maintain humidity between 30-50% Rh.

Seal HVAC supply vents and/or return air vents in remediation area(s)

Signs advising that a mold remediation project is in progress shall be displayed at all accessible entrances to remediation areas. The signs shall be at least eight 8 inches by ten 10 inches in size and shall bear the words "NOTICE: Mold Remediation Project In Progress" in black on a yellow background. The text of the signs must be legible from a distance of ten 10 feet.

Section 3.2 Personal Protective Equipment (PPE)

Minimum PPE

FULL PPE REQUIRED

Gloves

Disposable Full Body Clothing

Head Gear

Foot Coverings

Full-Face Respirator with HEPA Filter

The remediation contractor shall insure that OSHA appropriate personal protective equipment (PPE) is worn while remediating all containment areas.

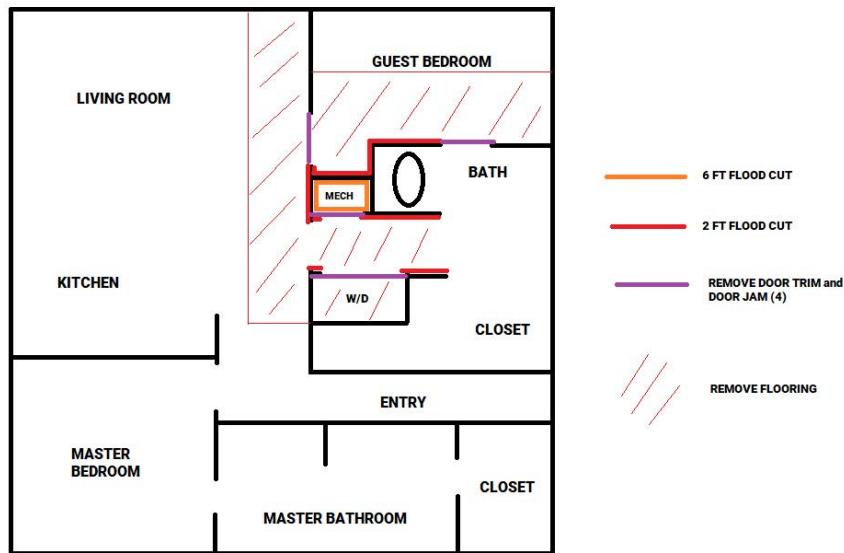
Use professional judgment, consider potential for remodeler exposure and size of contaminated area. Contractor assumes all responsibility for PPE compliance.

The EPA Guidelines for Remediation of Building Materials with Mold Growth by Clean Water requirements for PPE should be followed. The complete table is included at the end of this document in U.S. EPA Cleaning Methods, Table 2.

Note: Professional judgment should always play a part in PPE decisions. The EPA guidelines are based on the total surface area contaminated and the potential for remodeler and/or occupant exposure, not on the basis of health effects or research showing there is a specific method appropriate at a certain number of square feet. The guidelines have been designed to help construct a remediation plan. The remediation contractor will then use professional judgment and experience to adapt the guidelines to particular situations.

Section 4.0 Specific Remediation Requirements

Section 4.1 Project Diagram



- Follow all Containment Procedures in **Section 3.1**
- Remove door trim and door jams on 4 doors as indicated in PURPLE (W/D, Mechanical, Guest Bedroom, Guest Bathroom)
- Detach HVAC unit and remove platform
- 6 FT flood cut inside mechanical closet as indicated in ORANGE - approx 60 sq ft
- Cut out approx 9 sq ft CEILING in Mechanical Closet
- Remove 16 LF baseboard and 2 ft flood cut walls indicated in RED - approx 68 sq ft
- Remove 6 x 3 laminate flooring and underlayment in hallway
- Remove 3 x 6 laminate flooring and underlayment in W/D area
- Remove approx 11 x 4 section of laminate flooring in living room as indicated
- Remove approx 12 x 4 section of carpet in guest bedroom as indicated
- Follow all Cleaning Procedures in **Section 4.2** on next page

Section 4.0 Specific Remediation Requirements

4.2 Cleaning Procedures

- Follow all Containment Procedures in **Section 3.1**
- **CONTENTS:** Pack-out and clean contents according to **Table 2: EPA Cleanup Methods** at the end of this document.(HEPA vacuum/damp-wipe/steam clean) All washable soft contents (clothing, bedding, etc) should be washed according to manufacturer's instructions.
- **Cleaning Procedures For Demolition:**
 - Remove all insulation and other porous materials in wall cavities and thoroughly HEPA vacuum all dust and debris
 - Clean framing with HEPA vacuum and a grease cutting soap solution or an EPA approved mold cleaning product used according to the manufacturer's instructions. For wood framing, use a sander to remove the top layer of discoloration from the wood and HEPA vacuum all dust.
 - **DO NOT ENCAPSULATE FRAMING WITHOUT APPROVAL FROM THE MAC** -If any framing in not able to be adequately cleaned/sanded to remove mold growth or staining, please text post-cleaning pictures to 972-945-6653.
 - Inspect wall cavities for signs of contamination, hidden water damage and/or mold growth. Semi-porous building materials (framing, studs, joists, sub-floors, etc.) which cannot be adequately cleaned of fungal growth or containing rotten wood should be removed and disposed. If the integrity of any support structure is questionable, it should be replaced. Any materials removed should extend at least 24" past the last signs of water damage or visible mold growth.
 - Dry all wet materials. Wood moisture content should not exceed 15% after cleaning is performed. Air movers and dehumidification equipment should be utilized to dry the structure as needed.
 - HEPA vacuum and damp-wipe all surfaces in the contained area until there is no visible dust or debris
 - Dispose of all mold containing materials in double 6 mil poly and wipe the outside
- **HVAC:** Have a licensed HVAC professional clean the inside of the HVAC unit - coils, blower fans, plenums, etc. Visually inspect supply plenum for visible microbial growth and replace if necessary. Clean HVAC ducting under negative pressure with HEPA filtration. Change all filters and clean registers.
- **ENVIRONMENTAL CLEANING THROUGHOUT ENTIRE UNIT FOLLOWING DEMOLITION:** HEPA vacuum all surfaces. Damp-wipe all horizontal and dust collecting surfaces using a mild detergent solution. HEPA vacuum carpets multiple times in a criss-cross pattern followed by steam cleaning. Dry carpets thoroughly. Place an air scrubber in each bedroom and in the living room/kitchen area.
- **Air wash with fans and allow air scrubbers to run for 48 hours prior to clearance testing**

**The use of EPA registered disinfectants, biocides and antimicrobial coatings may be used; however, if the remediation contractor wishes to use an antimicrobial encapsulant prior to post remediation assessment, the assessment consultant must be contacted for discussion and approval of application areas prior to proceeding. Mold assessment consultant will require visual and/or photo confirmation from the remediation contractor regarding the area(s) in question prior to encapsulation being applied.*

NOTE: The steps outlined here are the minimum steps required for remediation. A remediation contractor may take additional or varied steps as dictated by their judgment and/or operating procedures to adequately abate the mold contamination. However, should significant variance from the above recommendations be required or other issues regarding remediation arise, the remediation contractor should first obtain concurrence from the Mold Assessment Consultant.

Section 5.0

Post Remediation Assessment and Clearance Criteria

Once the remediation has been completed, for the contaminated area(s) to achieve Clearance, a Post Remediation Inspection must be performed along with the collection and analysis of an appropriate number of samples.

Dallas Mold Consultants must be provided with a copy of the Remediation Contractor's Work Plan for the Mold Assessment Consultant to determine whether the remediation has been completed in accordance with this protocol.

Prior to obtaining final clearance the owner/agent must have repaired the underlying cause of the mold, so that it is reasonably certain that the mold will not return from the same cause.

The Mold Assessment Consultant shall perform a visual, procedural, and analytical evaluations in the impacted area(s) to determine whether the remediation has been performed according to the Remediation Protocol provided for this project.

5.1 Visual Inspection

A thorough visual inspection of the containment area(s) or remediation areas will be performed. All areas should be left dry and visibly free of all visible microbial contamination and debris.

Under no circumstances should any encapsulant and primers be applied to any surfaces prior to the Post-Remediation, Inspection and Clearance Testing unless approved by the Mold Assessment Consultant.

Containments must remain in place until Clearance Lab Results.

5.2 Sampling

The sample analysis must reveal no mold growth on any surface sampled and airborne mold counts must be statistically similar to outdoor air for corresponding mold types and total indoor air mold spore concentrations must be generally lower than outdoor mold spore concentrations. IICRC S520 Clearance Standards apply.

1. One air sample from inside each containment or work area where mold was previously detected (one per area).
2. One indoor control air sample from inside the property outside of the containment(s) or work area(s).
3. One to two surface sample(s) per affected area where mold growth was previously observed.
4. At least one outdoor air sample required as a baseline for the Lab.

5.3 Clearance Criteria

The Clearance Investigation and Testing is conducted when mold remediation and cleanup efforts are completed but before containment is removed and renovation activities have begun.

The purpose of the clearance investigation is to ensure that remediation activities have been completed as outlined in the Remediation Protocol, containment has been maintained, all dust and debris have been removed from the containment areas, and no malodors or visible mold is present.

Clearance testing consists of a visual assessment for mold problems in area(s) of remediation activities and the collection/analysis of a tape lift sample and an air quality test in these designated area(s).

Clearance is defined as tape and air samples collected indoors being quantitatively equal to or less than outdoor samples, and qualitatively similar. There are no exposure limits for the swab or tape lift sample.

As a general rule acceptable clearance of a containment area is reached when the genus of fungi collected from indoor air are equal to or less than outdoor air. Marker spores such as Chaetomium or Stachybotrys that are measured at more than 2 spores in the air test will result in the area not being cleared. Total average spore counts in the containment area should not exceed 2,000, and a single spore category should not exceed 1,000. In addition, the rank order and type of organism identified may indicate interior contamination and related need for additional action.

If the containment area has dust, debris, breached containment, lack of quality control related to remediation specifications the inspector will not conduct further clearance activities. The client will be informed of observed project deficit concerns for communication with the Mold Remediation Contractor. In addition, if visible mold is present, a tape lift and swab sample is collected for lab analysis.

NOTICE to CLIENT:

Part of the clearance process is ensuring that the source of the problem has been addressed to ensure the problem doesn't reoccur. As the homeowner, you agree to address all sources of water intrusion. Once the restoration/remediation efforts have commenced, you agree and understand that it is NOT SAFE for you to re-enter the contained space until a clearance has been achieved. By doing so you may breach the containment, cross-contaminate the other parts of your home and delay the process. If clearance is not achieved on the first attempt, the contractor will be required to re-clean and let the air scrubbers run for an additional time. After the first clearance test, subsequent clearance inspection costs will be at the restoration contractor's expense, UNLESS it is found that the client has entered and breached the containment area during clearance efforts.

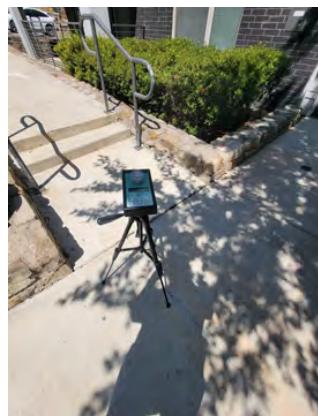
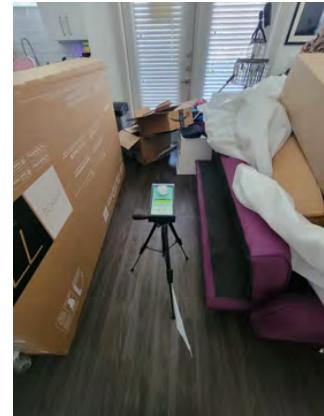
By engaging this project, the contractor also agrees to these terms.

Client's Initials: _____

Section 6.0

6.1 Photographic Documentation

Air Samples - Temperature - Humidity Readings



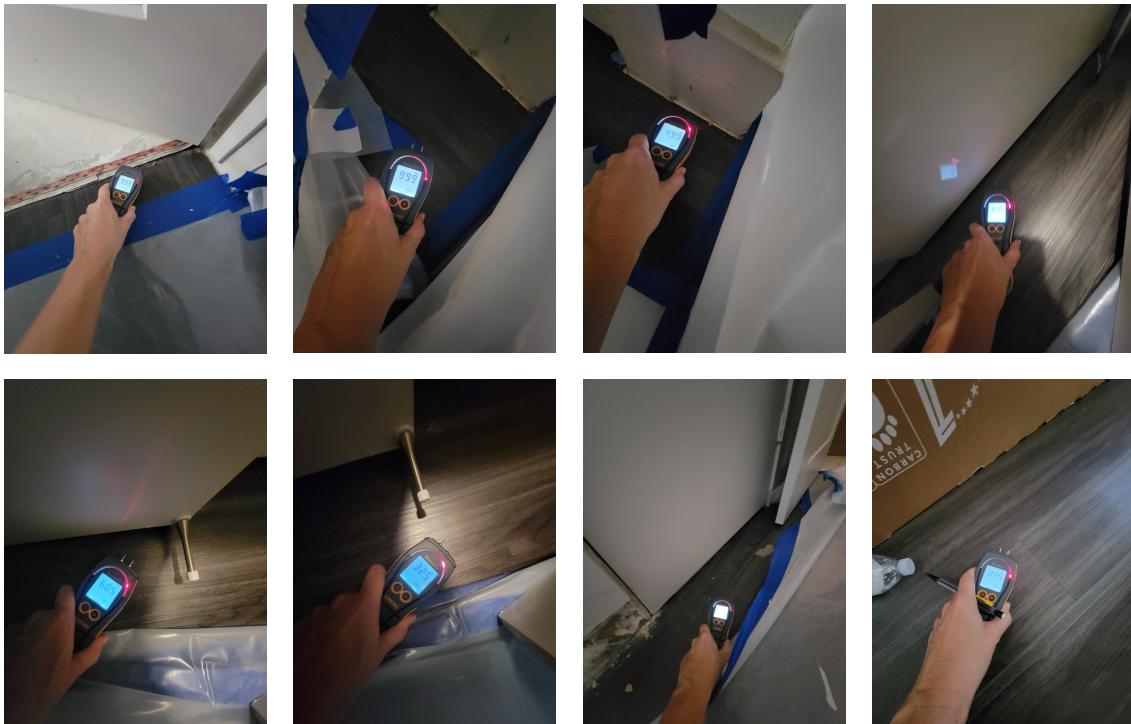
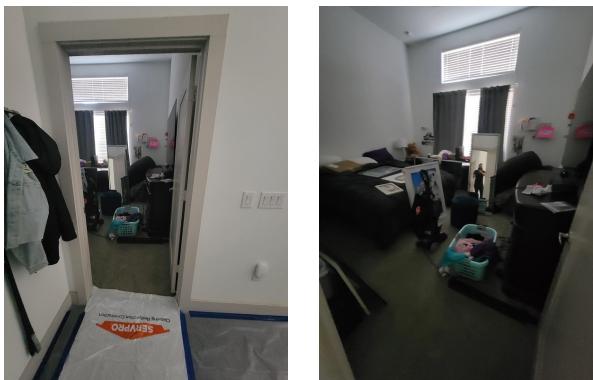
Guest Bedroom Drywall
Tape Lift Sample



Utility Hallway Drywall Tape
Lift Sample

6.1 Photographic Documentation (Continued)





Section 7.0 Credentials

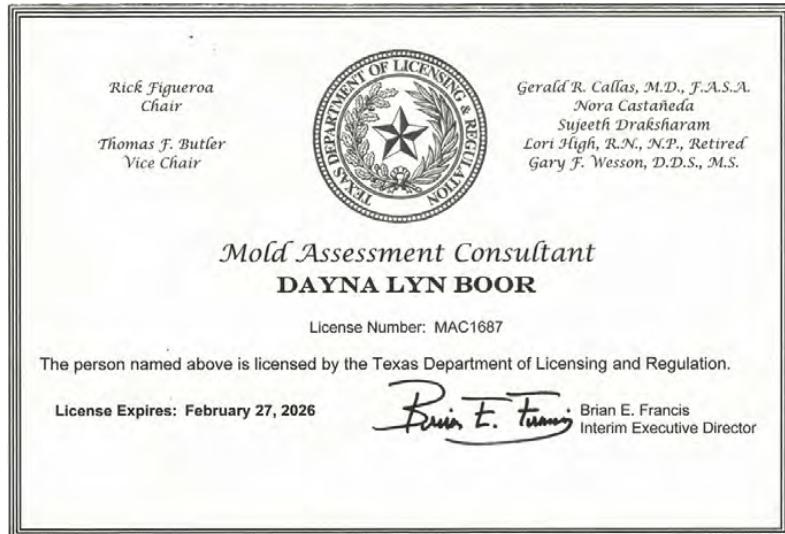


Table 2: Guidelines for Remediating Building Materials with Mold Growth Caused by Clean Water*

Material or Furnishing Affected	Cleanup Methods [†]	Personal Protective Equipment	Containment
SMALL – Total Surface Area Affected Less Than 10 square feet (ft²)			
Books and papers	3	Minimum N-95 respirator, gloves, and goggles	None required
Carpet and backing	1, 3		
Concrete or cinder block	1, 3		
Hard surface, porous flooring (Linoleum, ceramic tile, vinyl)	1, 2, 3		
Non-porous, hard surfaces (Plastics, metals)	1, 2, 3		
Upholstered furniture & drapes	1, 3		
Wallboard (Drywall and gypsum board)	3		
Wood surfaces	1, 2, 3		
MEDIUM – Total Surface Area Affected Between 10 and 100 (ft²)			
Books and papers	3	Limited or Full Use professional judgment, consider potential for remediator exposure and size of contaminated area	Limited Use professional judgment, consider potential for remediator/occupant exposure and size of contaminated area
Carpet and backing	1, 3, 4		
Concrete or cinder block	1, 3		
Hard surface, porous flooring (Linoleum, ceramic tile, vinyl)	1, 2, 3		
Non-porous, hard surfaces (Plastics, metals)	1, 2, 3		
Upholstered furniture & drapes	1, 3, 4		
Wallboard (Drywall and gypsum board)	3, 4		
Wood surfaces	1, 2, 3		
LARGE – Total Surface Area Affected Greater Than 100 (ft²) or Potential for Increased Occupant or Remediator Exposure During Remediation Estimated to be Significant			
Books and papers	3	Full Use professional judgment, consider potential for remediator/occupant exposure and size of contaminated area	Full Use professional judgment, consider potential for remediator/occupant exposure and size of contaminated area
Carpet and backing	1, 3, 4		
Concrete or cinder block	1, 3		
Hard surface, porous flooring (Linoleum, ceramic tile, vinyl)	1, 2, 3, 4		
Non-porous, hard surfaces (Plastics, metals)	1, 2, 3		
Upholstered furniture & drapes	1, 3, 4		
Wallboard (Drywall and gypsum board)	3, 4		
Wood surfaces	1, 2, 3, 4		

EPA Cleanup Methods

Use professional judgment to determine prudent levels of Personal Protective Equipment and containment for each situation, particularly as the remediation site size increases and the potential for exposure and health effects arises. Assess the need for increased Personal Protective Equipment, if, during the remediation more extensive contamination is encountered than was expected. These guidelines are for damage caused by clean water. If you know or suspect that the water source is contaminated with sewage, or chemical or biological pollutants, then the Occupational Safety and Health Administration (OSHA) requires PPE and containment. An experienced professional should be consulted if you and/or your remediator do not have expertise in remediating contaminated water situations. Select method most appropriate to situation. Since molds gradually destroy the things they grow on, if mold growth is not addressed promptly, some items may be damaged such that cleaning will not restore their original appearance. If mold growth is heavy and items are valuable or important, you may wish to consult a restoration/water damage/remediation expert. Please note that these are guidelines; other cleaning methods may be preferred by some professionals.

Cleanup Methods

Method 1: Wet vacuum (in the case of porous materials, some mold spores/fragments will remain in the material but will not grow if the materials is completely dried). Steam cleaning may be an alternative for carpets and some upholstered furniture.

Method 2: Damp-wipe surfaces with plain water or with water and detergent solution (except wood-use wood floor cleaner); scrub as needed.

Method 3: High-efficiency particulate air (HEPA) vacuum after the material has been thoroughly dried. Dispose of the contents of the HEPA vacuum in well-sealed plastic bags.

Method 4: Discard - remove water-damaged materials and seal in plastic bags while inside of containment, if present. Dispose of as normal waste. HEPA vacuum area after it is dried.

Personal Protective Equipment (PPE)

Minimum: Gloves, N-95 respirator, goggle/eye protection

Limited: Gloves, N-95 respirator or half-face respirator with HEPA filter, disposable overalls, goggles/eye protection

Full: Gloves, disposable full body clothing, head gear, foot coverings, full-face respirator with HEPA filter

Containment

Limited: Use polyethylene sheeting ceiling to floor around affected area with a slit entry and covering flap; maintain area under negative pressure with HEPA filtered fan unit. Block supply and return air vents within containment area.

Full: Use two layers of fire-retardant polyethylene sheeting with one airlock chamber. Maintain area under negative pressure with HEPA filtered fan exhausted outside of building. Block supply and return air vents within containment area.



CONSUMER MOLD INFORMATION SHEET



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How does Texas regulate businesses that do testing for mold or that do mold cleanup?

The Department of Licensing and Regulation (TDLR) regulates such businesses in accordance with the [Texas Occupations Code, Chapter 1958](#). Under the **Texas Mold Assessment and Remediation Rules (rules)** ([16 Tex. Admin. Code, Chapter 78](#)), all companies and individuals who perform mold-related activities in Texas must be licensed by TDLR unless exempt. (See Page 2 regarding owner exemptions.) Individuals must meet certain qualifications, have required training, and pass a state exam and criminal history background check in order to be issued a license. Applicants for a mold remediation worker registration must have training and pass a criminal history background in order to be registered by TDLR. Laboratories that analyze mold samples must also be licensed and meet certain qualifications. The rules set minimum work practices and procedures and also require licensees to follow a code of ethics. To prevent conflicts of interest, the rules also prohibit a licensee from conducting both mold assessment and mold remediation on the same project. While the rules regulate the activities of mold licensees when they are doing mold-related activities, the rules do not require any property owner or occupant to clean up mold or to have it cleaned up.

How can I know if someone is licensed?

A licensed individual is required to carry a current TDLR license certificate with the license number on it. A search tool and listings of currently licensed companies and individuals can be found at: <https://www.tdlr.texas.gov/LicenseSearch/>.

What is “mold assessment?”

Mold assessment is an inspection of a building by a **mold assessment consultant** or **technician** to evaluate whether mold growth is present and to what extent. Samples may be taken to determine the amount and types of mold that are present; however, sampling is not necessary in many cases. When

mold cleanup is necessary a licensed mold assessment consultant can provide you with a **mold remediation protocol**. A protocol must specify the estimated quantities and locations of materials to be remediated, methods to be used and clearance criteria that must be met.

What is meant by “clearance criteria?”

Clearance criteria refer to the level of “cleanliness” that must be achieved by the persons conducting the mold cleanup. It is important to understand and agree with the mold assessment consultant prior to starting the project as to what an acceptable clearance level will be, including what will be acceptable results for any air sampling or surface sampling for mold. There are no national or state standards for a “safe” level of mold. Mold spores are a natural part of the environment and are always present at some level in the air and on surfaces all around us.

What is “mold remediation?”

Mold remediation is the cleanup and removal of mold growth from surfaces and/or contents in a building. It also refers to actions taken to prevent mold from growing back. Licensed **mold remediation contractors** must follow a mold remediation protocol as described above and their own **mold remediation work plan** that provides specific instructions and/or standard operating procedures for how the project will be done.

Before a remediation project can be deemed successful, a mold assessment consultant must conduct a **post-remediation assessment**. This is an inspection to ensure that the work area is free from all visible mold and wood rot, the project was completed in compliance with the remediation protocol and remediation work plan, and that it meets all clearance criteria that were specified in the protocol. The assessment consultant must give you a **passed clearance report** documenting the results of this inspection. If the project fails clearance,

further remediation as prescribed by a consultant will be necessary.

What is a Certificate of Mold Damage Remediation?

No later than the 10th day after a mold remediation project stop date, the remediation contractor must sign and give you a **Certificate of Mold Damage Remediation**. The licensed mold assessment consultant who conducted the post-remediation assessment must also sign the certificate. The consultant must truthfully state on the certificate that the mold contamination identified for the project has been remediated and whether the underlying cause of the mold has been corrected. (That work may involve other types of professional services that are not regulated by the mold rules, such as plumbing or carpentry.) Receiving a certificate documenting that the underlying cause of the mold was remediated is an advantage for a homeowner. It prevents an insurer from making an underwriting decision on the residential property based on previous mold damage or previous claims for mold damage. If you sell your property, the law requires that you provide the buyer a copy of all certificates you have received for that property within the preceding five years.

How is a property owner protected if a mold assessor or remediator does a poor job or damages the property?

The rules require licensees to have commercial general liability insurance in the amount of at least \$1 million, or to be self-insured, to cover any damage to your property. Before hiring anyone, you should ask for proof of such insurance coverage. You may wish to inquire if the company carries additional insurance, such as professional liability/errors and omissions (for consultants) or pollution insurance (for contractors), that would provide additional recourse to you should the company fail to perform properly.

How is my confidentiality protected if I share personal information about myself with a company?

Under the code of ethics in the rules, to the extent required by law, licensees must keep confidential any personal information about a client (including medical conditions) obtained during the course of a mold-related activity. Further, you may be able to negotiate a contract to include language that other personal information be kept confidential unless disclosure “is required by law.” However, licensees are required to identify dates and addresses of projects and other details that can become public information.

How do I file a complaint about a company?

Anyone who believes a company or individual has violated the rules can file a complaint with TDLR. For information on this process, call 1-800-803-9202, or complete the online complaint form at <https://www.tdlr.texas.gov/complaints/>.

Can property owners do mold assessment or remediation on their own property without being licensed?

Yes. A homeowner can take samples for mold or clean it up in the home without a license. An owner, or a managing agent or employee of an owner of a residential property is not required to be licensed, **unless** the property has 10 or more residential dwelling units. For non-residential properties, an owner or tenant, or a managing agent or employee of an owner or tenant, is not required to be licensed to do mold assessment or remediation on property owned or leased by the owner or tenant, **unless** the mold contamination affects a total surface area of 25 contiguous square feet or more. Please refer to 16 TAC §78.30 for further details on exceptions and exemptions to licensing requirements.

For more information about mold and the Texas Mold Assessment and Remediation Rules, contact:

Texas Department of Licensing and Regulation

Mold Assessors and Remediators

P.O. Box 12057, Austin, TX 78711

Phone: 512-463-6599 or 800-803-9202

www.tdlr.texas.gov

Re-inspection Report

Project No: Weinstein-090425
Inspection Date: 10/17/2025



**220 E Broadway Ave #2145
Ft. Worth, TX 76104**

Prepared By:

Dallas Mold Consultants
8080 N Central Expressway, Suite 1700
Dallas, TX 75206
972-945-MOLD (6653)
office@dallasmoldconsultants.com

Prepared For:

Weinstein Properties
Pamela Quinn
804.283.4708
pquinn@weinsteinproperties.com

NOTES: Mold testing was requested on an additional area of suspicion by the front door. The paint in the area does have an odd appearance and there is a dark substance that is suspected to be mold.

The drywall does not have elevated moisture readings.

A swab sample was collected from the area which revealed normal fungal ecology. To further rule out water damage and mold growth inside the wall cavity, exploratory measures such as removal of baseboard/door trim and removal of the drywall could be taken.

See pictures and lab snapshot on next page.
Full lab report sent as a separate attachment.

Written By:

Dayna Boor

Licensed Mold Assessment Consultant - TDRL # MAC1687, Exp. 02/27/2026
Licensed Mold Remediation Contractor - TDRL # MRC1602, Exp. 04/02/2027

DK

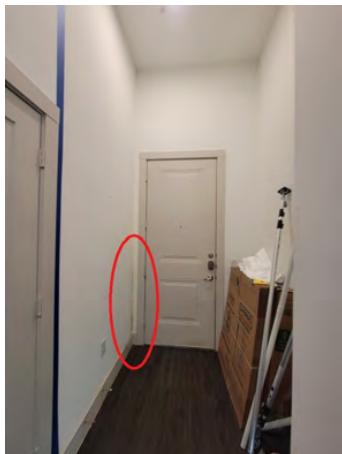
Lab Results

Sample No:	101725-01	Analysis Date:	10/18/2025	Sample Type:	Swab
Location:	Entry Drywall	Identification			
					Rating
Alternaria		Minor			
Ascospores, non-specified		Minor			
Bipolaris/Dreschslera/Helminthosporium/Exserohilum		Minor			
Curvularia		Minor			
Myxomycetes/Periconia/Smut/Rust		Minor			
Nigrospora		Minor			
Non-specified spore		Minor			
Pithomyces		Minor			
Hyphal Fragments		Minor			



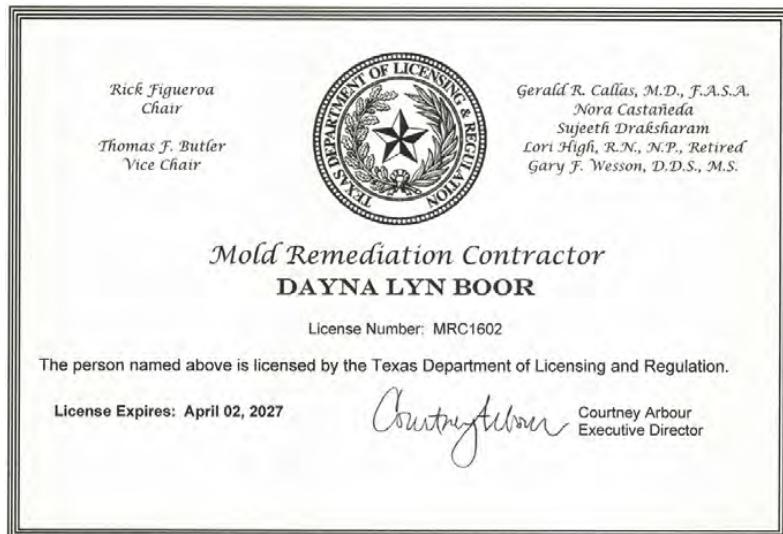
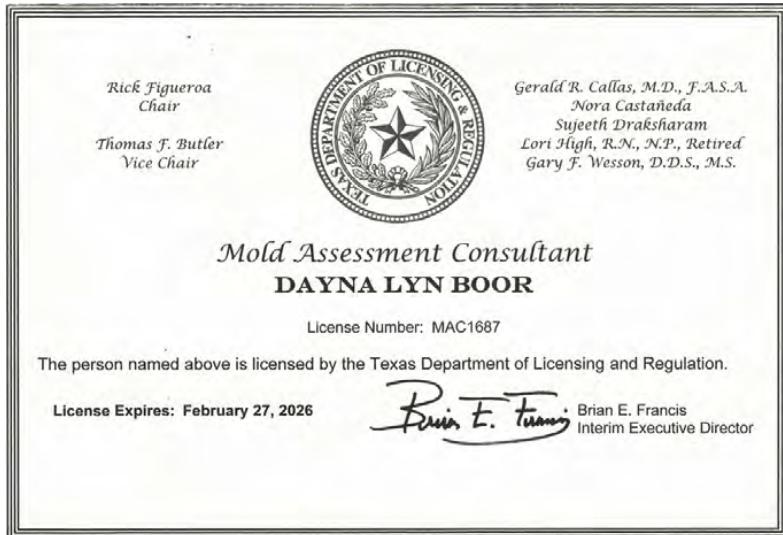
A surface swab sample collected from this area identified minor concentrations of Alternaria, Ascospores, Bipolaris, Curvularia, Myxomycetes, Nigrospora, and Pithomyces.

These minor concentrations are not indicative of mold growth on the drywall but rather normal fungal ecology on a surface.



DkB

Credentials





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www.tdlr.texas.gov

PROJECT INFORMATION

Weinstein-090425

220 E Broadway Ave #2145

Fort Worth, Texas 76104

Project No.: Not Provided

This test report contains the following sections: Cover, Report, FAQ, and Glossary

Direct Exam Chain of Custody

Test Code 3: Direct Exam -fungal limited

Analysis Method: Internal SOP M-3

DALLAS MOLD CONSULTANTS
 (972) 945-6653
 10440 N Central Expressway
 STE 800
 Dallas, Texas 75231

Company name	Dallas Mold Consultants		
Address	8080 N. Central Expy Ste 1700	City	Dallas
State	TX	ZIP	75206
Project name	Weinstein - 090425		
Project address	220 E Broadway Ave #2145, Ft. Worth, TX		
Project/functional			
Sample Date	09/04/2025		
	3HR	6HR	24HR
	○	○	○
	48HR	3DAY	5DAY
	○	○	○

moldlab

FIM-17 External 10 Line

Chain of Custody Form

Submitted By: Dayna Boor

Cell phone

214-606-1330

Email address:

dayn@dallasmoldconsultants.com

CC:

MOLD		ASBESTOS	
Air Samples	Surface Samples	7 PAM	B PAM Point Count
1. Open top, mold only	1. Open top, mold only, -30cm ²	8	9
2. Open top, mold & other particle	4. Open top, mold & other particle, -30cm ²	9	10
Sample # or ID	Sample Name/Location or Description	Temp	R.H.%
1.	Guest Bedroom, Tape Lift	76	63
2.	HVAC Duct, Drywall Tape Lift	76	63
3.	HVAC Closet, Drywall Tape Lift	76	63
4.	Guest Bedroom	76	63
5.	Living Room	76	63
6.	Master Bedroom	76	63
7.	Outside Baseline	92	43
8.			
9.			
10.			
Payment options	<input type="radio"/> Invoice to account <input checked="" type="radio"/> Process credit card on file <input type="radio"/> Enclosed check	Released by (print/signature)	In signing this document, you certify that no samples were sent to anyone else without your prior written consent. I understand that Moldlab is not responsible for damage to samples sent to me after they have been released from Moldlab's control. I am responsible for any damage to samples sent to me.
Field Notes:	<i>[Handwritten notes]</i>		
Special Instructions:			
Tracking #:			

Lab Job #	
Rev. 7, Issue Date: 3/24/2022	Date: 09/04/2025
2501 Mayes Rd, Ste # 110 Carrollton, TX 75006 info@moldlab.com 1-866-416-0653	Page _____ of _____

moldlab

DECEMBER

SEP 04 2025

BY [Signature]

Company name	Dallas Mold Consultants		
Address	8080 N. Central Expy Ste 1700	City	Dallas
State	TX	ZIP	75206
Project name	Weinstein - 090425		
Project address	220 E Broadway Ave #2145, Ft. Worth, TX		
Project/functional			
Sample Date	09/04/2025		
	3HR	6HR	24HR
	○	○	○
	48HR	3DAY	5DAY
	○	○	○

Test Codes	Air Samples	Surface Samples	
Sample # or ID	1. Open top, mold only	1. Open top, mold only, -30cm ²	
	2. Open top, mold & other particle	4. Open top, mold & other particle, -30cm ²	
Sample Name/Location or Description	Temp	R.H.%	
1.	76	63	
2.	76	63	
3.	76	63	
4.	76	63	
5.	76	63	
6.	76	63	
7.	76	63	
8.	92	43	
9.			
10.			
Payment options	<input type="radio"/> Invoice to account <input checked="" type="radio"/> Process credit card on file <input type="radio"/> Enclosed check	Released by (print/signature)	In signing this document, you certify that no samples were sent to anyone else without your prior written consent. I understand that Moldlab is not responsible for damage to samples sent to me after they have been released from Moldlab's control. I am responsible for any damage to samples sent to me.
Field Notes:	<i>[Handwritten notes]</i>		
Special Instructions:			
Tracking #:			

Lab Job #	
Rev. 7, Issue Date: 3/24/2022	Date: 09/04/2025
2501 Mayes Rd, Ste # 110 Carrollton, TX 75006 info@moldlab.com 1-866-416-0653	Page _____ of _____

moldlab

DECEMBER

SEP 04 2025

BY [Signature]

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 9/4/2025 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111920 | Technician: Steven Reese

Page 1 | 1

Results apply only to samples as received and tested. Results may not be reported or reproduced except in full without written approval of Moldlab. All samples were received in acceptable condition unless noted in the Tech Notes section. Field blank correction of results is not applied. An estimate of measurement uncertainty is provided upon request. Moldlab assumes no responsibility for sample collection or handling prior to receipt at the laboratory. This report does not express or imply interpretation of the results contained herein.

LAB0137 by the Texas Dept. of Licensing and Regulation, AIHA LAP, LLC EMLAP Accredited ID No. 154782. Report Approved by Kristina Rucker

Approved by:

Kristina Rucker, Lab Director



Toll Free: (866) 416-0653
 Website - www.moldlab.com

Lab ID #: 154782

PROJECT INFORMATION

Weinstein-090425

220 E Broadway Ave #2145

Fort Worth, Texas 76104

Project No.: Not Provided

Report

Test Code 3: Direct Exam -fungal limited

Analysis Method: Internal SOP M-3

STE 800
10440 N Central Expressway
Dallas, Texas 75231

This test report contains the following sections: Cover, Report, FAQ, and Glossary

Sample No:	090425-01	Analysis Date:	9/5/2025	Sample Type:	Tape / Bio-tape
Location:	HVAC Closet Drywall Tape Lift	Identification	Rating		
		Aspergillus/Penicillium-like	Minor		
		Chaetomium	Heavy		
		Cladosporium	Minor		
		Hyphal Fragments	Heavy		
Sample No:	090425-02	Analysis Date:	9/5/2025	Sample Type:	Tape / Bio-tape
Location:	HVAC Closet Drywall Tape Lift	Identification	Rating		
		Chaetomium	Heavy		
		Hyphal Fragments	Heavy		

Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 4/9/2025 13:13 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111920 | Technician: Steven Reese

Results apply only to samples tested. Results may not be reproduced except in full without written approval of Moldlab. All samples were received in acceptable condition unless noted in the Tech Notes section. Moldlab assumes no responsibility for sample collection or handling prior to receipt at the laboratory. Field blank correction of results is not applied. Rating is based on the average Qualified Structures (QS) per Field of View (FV). A QS is the analyte of interest chosen by the client. No Mold Detected (0 QS), Minor (1 QS/FV or less), Moderate (>1 to 3 QS/FV), and Heavy (>3 QS/FV) ratings are used. QS observed from the samples submitted are listed on this report. If a QS is not listed, it was not observed in the samples submitted. This report does not express or imply interpretation of the results contained herein. Samples received and analyzed by Moldlab, Ltd.



2501 Mayes Rd #110
Carrollton, Texas 75006
P - (972) 820-9373
Toll Free (866) 416-6653
Website - www.moldlab.com

PROJECT INFORMATION

Weinstein-090425

220 E Broadway Ave #2145

Fort Worth, Texas 76104

Project No.: Not Provided

Direct Exam FAQ

Test Code 3: Direct Exam -fungal limited

Analysis Method: Internal SOP M-3

STE 800

Dallas, Texas 75231

This test report contains the following sections: Cover, Report, FAQ, and Glossary

What does the rating system mean?

Mold is a normal part of our environment, and mold spores can settle out of the air into accumulated dust. This can cause 'minor' ratings of several different types of mold to appear even in a typical house dust sample, and these may not necessarily be a cause for concern. However, a 'heavy' rating may indicate that the sample was taken from a source of mold. Below are the exact criteria for each rating:

- 'No mold detected' means that the sample submitted did **not** contain a detectable level of mold.
- 'Minor' means that the technician observed 1 or fewer structures of mold per field of view under the microscope.
- 'Moderate' means 1 to 3 structures of mold were detected per field of view.
- 'Heavy' means greater than 3 structures were detected per field of view.

Always take into consideration the sample as a whole when interpreting results. It is important to also consider the types of mold detected and the location the sample was taken.

How do I learn more about the types of mold listed on my report?

Each report comes with its own mold dictionary, called the Glossary. Simply scroll to the Glossary section of your report and each mold type is listed alphabetically. There you'll find helpful information about each mold type.

Do I have the Black Mold?

How do I get rid of it?

Many molds are allergens and some may be toxicogenic. Disturbing the mold with cleaning methods increases the chances of exposure to the particulate. Mold clean up and disposal methods vary greatly from company to company. A good rule of thumb is that if the contaminated area is small and the material is non porous, such as metal, it can be cleaned by traditional methods, taking care to use personal protective equipment. Porous materials on the other hand, such as wood, textiles, or sheetrock, are difficult to clean because of the microscopic holes in the material. The 'root-like' structures of the mold called hyphae/mycelia can grow down into the holes and make it hard to clean effectively. The surface will appear clean but as soon as conditions are favorable the mold can start to grow again. Here is a link to the EPA mold help guide: <https://www.epa.gov/mold/brief-guide-mold-moisture-and-your-home>

Can we still live here?

There are no established 'safe' levels of mold, just as there are no established unsafe levels of mold, and individuals have different resistances and reactions to mold. Persons that are most likely to be adversely affected by mold exposure are: children, elderly, immunocompromised, and persons with respiratory disorders. If you suspect you are experiencing adverse health effects as a result of mold, please consult a medical professional. Please note that Moldlab, Ltd is not a medical, or clinical laboratory and we do not offer medical consulting or advice.

Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 9/9/2025 13:13 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111920 | Technician: Steven Reese

Results apply only to samples tested. Results may not be reported or reproduced except in full without written approval of Moldlab. This report does not express or imply interpretation of the results contained herein. Samples received and analyzed by Moldlab, Ltd. LAB0137 by the Texas Dept. of Licensing and Regulation. AIHA LAP, LLC EMLAP Accredited ID No. 154782. Report Approved by Kristina Rucker.



2501 Mayes Rd #110
Carrollton, Texas 75006
P - (972) 820-9373
Toll Free (866) 416-6653
Website - www.moldlab.com

PROJECT INFORMATION

Weinstein-090425

220 E Broadway Ave #2145

Fort Worth, Texas 76104

Project No.: Not Provided

This test report contains the following sections: Cover, Report, FAQ, and Glossary

Direct Exam Glossary

Test Code 3: Direct Exam -fungal limited

Analysis Method: Internal SOP M-3


**DALLAS MOLD
CONSULTANTS**
(972) 945-6653
10440 N Central Expressway
STE 800
Dallas, Texas 75231

*** Diagnosis of health effects should be left to a medical professional. Moldlab is not a clinical laboratory and does not have medical professionals on staff.

Health effects in general are not well studied, and dosage, exposure, and sensitivity thresholds are not well known and can potentially vary tremendously depending on various conditions and on the particular individual. Effects can also vary from species to species within a particular mold genus. The EPA, OSHA, NIOSH and other occupational health related associations in the U.S. have not yet established permissible exposure levels (PEL), recommended exposure limits (REL), or other limit values for aerallergens.

Please realize that the evaluation of one's specific results in terms of potential health hazards and subsequent courses of action are beyond the scope of the laboratory analysis.

Pictures / images are for *illustration* purposes only and are NOT of the samples tested.

Terminology:

Allergen- the most common effect, and can range from hay fever and asthma, to a very particular reaction in certain organs or tissues.

Contaminant- something that is present without injuring or benefiting the host; does not cause infection.

Opportunistic pathogen- Causes infection only when the weak or injured condition of the person gives the agent opportunity to infect; rarely infect persons who are otherwise healthy.

Definition

Aspergillus/Penicillium-like. (as-per-jill-uhs) / (pen-uh-sill'ee-uhm)

Classification: Allergen / Contaminant/ Opportunistic Pathogen



Images



Tech Notes:

Submitted By: Dayna Boor | via: Hand Delivered | Submittal Date: 4/9/2025 13:13 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111920 | Technician: Steven Reese

This test report contains the following sections: Cover, Report, FAQ, and Glossary

Definition

Images

Chaetomium (kay-toe-me-um)

Classification: Contaminant / some report allergen

Possible Health Effect: Rarely involved in systemic and cutaneous disease and sometimes reported to be allergenic. Some species can produce toxins, and there is some research interest on whether these toxins can cause cancer.

Macroscopic Morphology: The surface of the mold is cottony, spreading and becomes tan or gray with age. With close examination the surface sometimes will appear to have little black specks like pepper.

Environment: Chaetomium is one of the few Ascomycetes that will grow and produce spores indoors. It prefers to grow on cellulose for example paper and wood. Primary IAQ importance is that it will grow in the same conditions as Stachybotrys (wet cellulose) and sheetrock paper. Colonies of Chaetomium and Stachybotrys will be growing on top of one another. Also, found in soil and hay.

Cladosporium (clad-oh-spore-ee-um)

Classification: Common Allergen/ Contaminant

Possible Health Effect: Rarely pathogenic, it is a common agent of hay fever and asthma and other allergy related symptoms.

Macroscopic Morphology: Surface of the mold is greenish brown or can appear black in color with age and have heap or folded appearance.

Environment: Cladosporium can be found in most air samples most of the time. It is very common. Cladosporium is one of the types of mold found growing on HVAC vent covers and grills. It can grow on leaves, textiles, wood, paper, and decaying vegetation.



Tech Notes:

Submitted By: Dayna Boor | via Hand Delivered | Submittal Date: 4/9/2025 13:13 | Sample Date: 9/4/2025 | Analysis Date: 9/5/2025 | Report Date: 9/5/2025 | Lab Job No.: 25-111920 | Technician: Steven Reese

Results apply only to samples tested. Results may not be reported or reproduced except in full without written approval of Moldlab. All samples were received in acceptable condition unless noted in the Tech Notes section. Field blank correction of results is not applied. Moldlab assumes no responsibility for sample collection or handling prior to receipt at the laboratory. This report does not express or imply interpretation of the results contained herein. Samples received and analyzed by Moldlab, Ltd. LAB0137 by the Texas Dept. of Licensing and Regulation, AIHA LAP, LLC EMLAP Accredited ID No. 154782. Report Approved by Kristina Rucker.



Subject: Re: Mold Assessment and Protocol
Date: Thursday, October 2, 2025 at 9:07:54 PM Central Daylight Time
From: Katie Copeland
To: Dayna Boor

Yes, but I will try again.

Sincerely,
Katie Copeland
817-789-8498

From: Dayna Boor <dayna@dallasmoldconsultants.com>
Date: Thursday, October 2, 2025 at 6:03 PM
To: Katie Copeland <quinnandpoppy@gmail.com>
Subject: RE: Mold Assessment and Protocol

Katie,

I can only release reports to the client who hired me. In this case, the property management company. Have you asked them for it?

Dayna

Sent from my T-Mobile 5G Device

----- Original message -----
From: Katie Copeland <quinnandpoppy@gmail.com>
Date: 10/25/25 12:58 PM (GMT-06:00)
To: office@dallasmoldconsultants.com
Subject: Mold Assessment and Protocol

Hello,

I am the tenant at at 220 E. Broadway #2145, Fort Worth, TX 76104.
May I please have a copy of the mold assessment report, lab results, and protocol completed in early September? I am especially curious about the findings of the lab tests on my belongings.

Sincerely,
Katie Copeland
817-789-8498

Exhibit A-1

Misrepresentations

1. Misrepresentation: Defendant Contributed to Mold Growth

Pleading Statement:

- **Motion for Protective Order, Section I:** “Plaintiffs contend that Defendant has exacerbated and/or contributed to any purported organic growth condition existing in her apartment.”

Conflicting Evidence:

- **DMC Protocol, September 8, 2025:** The protocol explicitly identifies **Chaetomium** and **Aspergillus** contamination throughout the apartment. The contamination was attributed to pre-existing conditions, including water intrusion and inadequate prior remediation, not tenant actions.

Significance:

This is a false factual assertion. Plaintiffs possessed licensed data from the DMC protocol proving the mold problem predicated Defendant’s occupancy. Misrepresenting this to the Court shifts blame to the tenant and conceals Plaintiffs’ failure to maintain habitable conditions, violating **Texas Property Code § 92.052**.

2. Misrepresentation: Defendant Interfered with Remediation

Pleading Statement:

- **Motion for Protective Order, Section I:** “...her failure to mitigate her damages and/or interference with remediation and/or repair efforts prevented Plaintiffs from being able to promptly remediate/repair the apartment.”

Conflicting Evidence:

- **DMC Protocol, September 8, 2025:** The protocol documents **incomplete containment**, **lack of negative pressure**, and the need for licensed remediation and state notification. These deficiencies, which are the responsibility of the property owner, made “prompt” remediation impossible regardless of tenant actions.

Significance:

This misrepresentation converts Plaintiffs’ own non-compliance with Texas Department of Licensing and Regulation (TDLR) standards into alleged tenant misconduct. It undermines Defendant’s claims of negligence and retaliation while attempting to deflect liability.

3. Misrepresentation: Defendant Caused New Water Damage

Pleading Statement:

- **Motion for Protective Order, Section I:** “Beginning on September 12, 2025, Defendant was directed to not turn on the air conditioner... Despite these directives... the HVAC system was ‘on’... resulting in water intrusion... This caused significant and new damage to the living room, kitchen, and HVAC hallway.”

Conflicting Evidence:

- **DMC Protocol, September 8, 2025:** The protocol, dated **four days before September 12**, already identified the need for full HVAC remediation due to contamination. It also documented the lack of negative pressure and incomplete containment, which rendered the environment unsafe for habitation.

Significance:

This statement misleads the Court by attributing new water damage to Defendant’s alleged actions while omitting the fact that the containment system was already deficient and the HVAC system required remediation prior to September 12. Plaintiffs’ omission of these facts shifts responsibility for the damage from their own non-compliance to the tenant.

4. Misrepresentation: Remediation Began in August

Pleading Statement:

- **Motion for Protective Order, Section I:** “...remediation efforts had started in August...”

Conflicting Evidence:

- **DMC Protocol, September 8, 2025:** The protocol does not reference any licensed remediation efforts beginning in August. Instead, it identifies ongoing contamination and the need for licensed remediation, including state notification and compliance with Texas Mold Assessment and Remediation Rules.

Significance:

If Plaintiffs began “remediation” in August without filing the required state notice or using licensed contractors, this constitutes a potential violation of **16 TAC §78.150** and **Occupations Code §1958.154**, which mandate proper licensing and notification for mold remediation. Representing these unlicensed and unreported activities as “remediation” to the Court misleads the Court about Plaintiffs’ compliance with state law.

5. Omission of ADA/FHA Context

Pleading Statement:

- **Motion for Protective Order, Section I:** “Defendant voluntarily returned to her apartment... Plaintiffs had secured a hotel... Defendant refused to stay at that particular hotel (Holiday Inn Express) and instead returned to her apartment.”

Conflicting Evidence:

- **DMC Protocol, September 8, 2025:** The protocol identifies the apartment as “unfit for human occupancy” due to contamination by **Chaetomium**, **Aspergillus**, and **Stachybotrys**, and emphasizes the need for proper containment and remediation.
- **Emails, September 18, 2025:** Contemporaneous communications document that the hotel offered by Plaintiffs (Holiday Inn Express) lacked ADA-compliant accommodations, which Defendant required due to her disability. Defendant requested alternative housing that met ADA and FHA standards, but Plaintiffs failed to provide it.

Significance:

This representation omits critical context about the unsafe conditions in the apartment and the inadequacy of the hotel accommodations. By failing to disclose that the hotel lacked ADA compliance and that the apartment was uninhabitable, Plaintiffs portray Defendant as irrational or uncooperative. This omission misleads the Court about Defendant’s motives and the harm she experienced, undermining her claims under the **Fair Housing Act (FHA)** and **Texas Property Code § 92.056**.

Pattern of Misrepresentation

The following table summarizes the recurring themes in Plaintiffs’ misrepresentations, how they mislead the Court, and the documentary evidence that contradicts them:

Theme	How It Misleads the Court	Documentary Reference
Tenant “caused or worsened mold”	Contradicted by DMC findings of Chaetomium and Aspergillus contamination.	DMC 9/8 L45-L49
Tenant “blocked remediation”	DMC shows unsafe/no negative pressure, requiring licensed remediation.	DMC 9/8 L33-L35
Tenant “caused new damage”	DMC already required HVAC remediation; no evidence AC use caused contamination.	DMC 9/8 L12-L21
Omission of ADA/FHA context	Hotel lacked required disability access; non-disclosure alters judicial perception.	Emails 9/18 ADA/FHA Request

Conclusion:

This analysis highlights Plaintiffs' pattern of misrepresenting facts and omitting critical context to deflect liability and shift blame to Defendant. These misrepresentations are significant because they undermine Defendant's claims of negligence, retaliation, and violations of the FHA and Texas Property Code. Plaintiffs' omissions also conceal their own failures to comply with state regulations and legal obligations.

Misrepresentations Chart: Plaintiffs' Key Assertions vs. Sept. 8, 2025 Record

What Plaintiffs told the Court (verbatim or near-verbatim)	Licensed record (9/8 DMC • 6/18 BioTex)	Targeted correction / relief	Pinpoint cites
Defendant has exacerbated and/or contributed to any purported organic growth condition.	DMC protocol documents Chaetomium and elevated Aspergillus across the unit and mandates licensed, state-noticed remediation; pre-existing guest-bedroom flooring system components (carpet, padding, wood tack strip) already slated for removal/disposal due to mold and water damage. BioTex declares the unit “unfit for human occupancy,” with water damage at baseboards and tack strip adjacent to the HVAC closet documented prior.	Neutral MAC + licensed-only remediation; no-disposal order; chain-of-custody inventory with weekly PDFs.	Plaintiffs’ Motion for Protective Order (10/10/25) (summary assertion) DMC Protocol (9/8/25); containment/negative pressure + flooring removals; HVAC steps. BioTex Assessment (6/18/25): unfit finding; baseboard/tack-strip damage near HVAC.
Defendant’s interference prevented prompt remediation.	DMC notes containment present but “no negative pressure on the containment,” and requires licensed work, written protocol, and clearance before encapsulants. Vendor non-compliance—not tenant conduct—precludes safe “prompt” progress.	Order licensed-only work with compliance certification; neutral oversight; deny protective order to limited scope of remediation/TDLR records.	Plaintiffs’ Motion for Protective Order (10/10/25) (summary assertion) DMC Protocol (9/8/25); “no negative pressure,” clearance criteria, licensed-only.
Remediation efforts had started in August [2025].	If work began without state notice/licensing and full protocol scope, it contravenes TMARR; DMC imposes clearance criteria, negative air, and HVAC sealing/handling that were not met.	Compel production within 7 days of TDLR notices, vendor licenses/insurance, containment/HVAC logs, and all protocol versions; prohibit further work until compliant.	Plaintiffs’ Motion for Protective Order (10/10/25) (timeline assertion) DMC Protocol (9/8/25) requirements.

HVAC/new damage narrative: “The water intrusion was the result of the HVAC system ... having been turned on by someone ... after Dallas Mold Consultant’s September 4, 2025 inspection ... [it] then ‘froze’ ... then ‘defrosted’, which caused water intrusion ... new and extensive damage ... including flooring, drywall, HVAC closet ...”	DMC (9/8) pre-dates this allegation and already requires HVAC remediation, sealed HVAC, and negative air; BioTex documents earlier water damage and mold at baseboards/tack strips adjacent to HVAC consistent with prior leak. Causation is not established by tenant conduct and omits containment deficiencies.	Preservation + neutral retrieval; increased bond; adverse inference if containment/HVAC logs not produced.	Plaintiffs’ Response to Defendant’s Emergency Application (pp. 14–15) (quoted passages supplied by Defendant) DMC Protocol (9/8/25) HVAC/negative air and flooring removal steps. BioTex Assessment (6/18/25) baseboard/tack-strip findings.
Defendant refused hotel and returned to the apartment.	Hotel churn was medically ineffective and unstable; ADA accommodation requests were pending; BioTex/DMC show conditions were unfit/unsafe absent compliant containment.	Prepaid ADA-effective housing through TI setting at reasonable market cap with direct-pay or registry fallback.	Plaintiffs’ Motion for Protective Order (10/10/25) (lodging narrative) BioTex “unfit” + DMC containment deficiencies.

The contemporaneous licensed record since September contradicts Plaintiffs’ narrative:

the 9/8/25 protocol documents apartment-wide contamination, inadequate containment (no negative pressure), pre-existing flooring damage slated for removal, and the need for licensed, state-noticed remediation and clearance; BioTex declared the unit unfit. Plaintiffs’ October filings omit these facts while attributing ‘new’ damage to Defendant. The Court should correct the record and enter narrow, lower-cost relief now: prepaid ADA-effective housing, neutral MAC-supervised preservation with no-disposal and weekly inventories, licensed-only remediation with compliance certification, targeted document production in 7 days, and an increased bond.

Exhibit B

Subject: Re: 141-370402-25 Supplemental Brief in Support of Defendant's Emergency Application for Temporary Mandatory Injunction (Filed 9/29/25)
Date: Thursday, October 16, 2025 at 11:21:55 AM Central Daylight Time
From: Copeland, Katie
To: Courts - 141st Judicial District Court
CC: Glynis Zavarelli, Michelle Sortor, John Douglas

Sorry, I am very confused. I have been waiting on Zoom for a while now

Sincerely,

Katie Copeland
(817) 789-8498
K.M.Copeland@tcu.edu

From: Courts - 141st Judicial District Court <141stJDC@tarrantcountytexas.gov>
Date: Thursday, October 16, 2025 at 10:57 AM
To: Copeland, Katie <K.M.COPELAND@tcu.edu>
Cc: Glynis Zavarelli <gzavarelli@wandzlaw.com>, Michelle Sortor <msortor@wandzlaw.com>, John Douglas <john@jadouglaslaw.com>
Subject: RE: 141-370402-25 Supplemental Brief in Support of Defendant's Emergency Application for Temporary Mandatory Injunction (Filed 9/29/25)

[EXTERNAL EMAIL WARNING] DO NOT CLICK LINKS or open attachments unless you recognize the sender and know the content is safe.

Ms. Copeland,
At the time you sent me the email below your hearing was already starting. This Court is VERY punctual. My instructions on Tuesday were very clear for you to log onto Zoom prior to the hearing start time (10:30am). The Judge was on Zoom at 10:27 and remained on there until 10:33.

The Plaintiff's Temporary Injunction was granted, and this case has been set for trial the week of May 11, 2026. You will receive written notice shortly.

Let me know if you would like your Request for Transcript (and any other motions) reset/set for hearing.

Cori James
Court Coordinator
141st District Court
100 N. Calhoun Street
Fort Worth, Texas 76102
817-884-1992
141stJDC@tarrantcountytexas.gov

From: Copeland, Katie <K.M.COPELAND@tcu.edu>
Sent: Thursday, October 16, 2025 10:30 AM
To: Courts - 141st Judicial District Court <141stJDC@tarrantcountytx.gov>
Cc: Glynis Zavarelli <gzavarelli@wandzlaw.com>; Michelle Sortor <msortor@wandzlaw.com>; John Douglas <john@jadouglaslaw.com>
Subject: Re: 141-370402-25 Supplemental Brief in Support of Defendant's Emergency Application for Temporary Mandatory Injunction (Filed 9/29/25)

EXTERNAL EMAIL ALERT! Think Before You Click!

Okay thank you.

FYI: I just e-filed these documents. Some had been kicked back because I had filled in the date on proposed orders and the clerk asked me to take it out. I was hoping to appear in person but this took me longer than I expected. I am just at the Worthington Hotel near the courthouse, so I will head over if the Court prefers it. Otherwise, I will Zoom so I am not late.

Sincerely,

Katie Copeland
(817) 789-8498
K.M.Copeland@tcu.edu

From: Courts - 141st Judicial District Court <141stJDC@tarrantcountytx.gov>
Date: Thursday, October 16, 2025 at 9:38 AM
To: Copeland, Katie <K.M.COPELAND@tcu.edu>
Cc: Glynis Zavarelli <gzavarelli@wandzlaw.com>, Michelle Sortor <msortor@wandzlaw.com>
Subject: RE: 141-370402-25 Supplemental Brief in Support of Defendant's Emergency Application for Temporary Mandatory Injunction (Filed 9/29/25)

[EXTERNAL EMAIL WARNING] DO NOT CLICK LINKS or open attachments unless you recognize the sender and know the content is safe.

Ms. Copeland,
Anything you want the Judge to see and to consider you must efile with the District Clerk's office.

Cori James
Court Coordinator
141st District Court

100 N. Calhoun Street
Fort Worth, Texas 76102
817-884-1992
141stJDC@tarrantcountytx.gov

From: Copeland, Katie <K.M.COPELAND@tcu.edu>
Sent: Thursday, October 16, 2025 12:50 AM
To: Courts - 141st Judicial District Court <141stJDC@tarrantcountytx.gov>
Cc: Glynis Zavarelli <gzavarelli@wandzlaw.com>; Michelle Sortor <msortor@wandzlaw.com>
Subject: 141-370402-25 Supplemental Brief in Support of Defendant's Emergency Application for Temporary Mandatory Injunction (Filed 9/29/25)

EXTERNAL EMAIL ALERT! Think Before You Click!

Hi Ms. James,

I'm sending the attached Supplemental Brief in Support of my Emergency Application for Temporary Mandatory Injunction filed on September 29, 2025. (8 pages)

This version includes more background, supporting law, and references to my prior filings. The shorter brief I e-filed today is my primary request for relief. (5 pages + exhibit)

Thank you so much for your time and understanding.

Sincerely,

Katie Copeland
(817) 789-8498
K.M.Copeland@tcu.edu

Exhibit C

Subject: Weinstein v. Copeland
Date: Thursday, October 16, 2025 at 6:27:40 PM Central Daylight Time
From: Glynis Zavarelli
To: Copeland, Katie
CC: Michelle Sortor

[EXTERNAL EMAIL WARNING] DO NOT CLICK LINKS or open attachments unless you recognize the sender and know the content is safe.

Ms. Copeland:

It is my understanding that your current hotel reservation at The Worthington expires on October 18th (meaning that is the day of check out). However, Weinstein is in the process of trying to extend this reservation (for the same room) through October 26- meaning, if it can be extended, you will need to check out on October 27. Weinstein will be paying the costs for the room through the October 26th date (and this does not include payment of incidentals). I will update you regarding the status of this extension, as soon as I receive that information.

Additionally, Weinstein will continue to incur the costs associated with boarding your dogs through October 26; as such, you will need to pick them up from Doggie Digs on October 27, or if you choose to keep them there from October 27 forward, you will need to pay for their care/boarding.

Further, as previously indicated, all items in both storage rooms (the one associated with your apartment, and the one which is on the 4th floor that is being used to store the items that were moved out of your apartment on October 5) will need to be moved out (at your expense) before October 27, and your keys/access fobs (apartment key fob, mailbox key, storage unit keys, gate access fob) can be placed in the rent drop box (located near the leasing office). To the extent, the items are not moved out on October 26, and/or your do not timely return your keys/access fobs, Weinstein will pursue all necessary legal remedies, and in that regard, I encourage you to review your lease agreement.

Please note that Weinstein's payment of the continued hotel stay and pet boarding through October 26 – is not an admission of liability nor is it an admission that there is any requirement/entitlement associated with this; all costs that have been incurred by Weinstein in relation to your hotel and pet boarding, at this point, are considered as an offset (to the extent that becomes necessary).

Please confirm receipt of this email; I am out tomorrow in a deposition most of the day, but again, will update as to The Worthington's ability to extend your reservation for your current room.

Thank you -

Glynis L. Zavarelli
Wentz & Zavarelli, LLP
3120 Sabre Drive, Suite 170
Southlake, Texas 76092
(469) 665-9100
Cell: (817) 832-3689

Subject: Weinstein v. Copeland;
Date: Wednesday, October 22, 2025 at 8:52:33 AM Central Daylight Time
From: Michelle Sortor
To: Copeland, Katie
Attachments: RE: Conference.eml, Weinstein v. Copeland; Corresp 10-6-25.pdf

[EXTERNAL EMAIL WARNING] DO NOT CLICK LINKS or open attachments unless you recognize the sender and know the content is safe.

Ms. Copeland - In reference to your email sent yesterday to Reign Restoration, to which I was copied, we provide to you our previous communications (Oct. 6 correspondence and Oct. 14 email). Please provide the necessary clarification so that Reign can move forward in locating your items and please confirm with the Worthington that all items can be received by you there.

As to items which remain at The Bowery (patio furniture in the patio of your unit, and 2 storage units) – please provide clarification as to how those items will be removed from the property by October 26.

Thank you.

Regards,

Michelle Sortor

Michelle S. Sortor
Wentz & Zavarelli, L.L.P.
3120 Sabre Drive, Suite 170
Southlake, Texas 76092

(469) 665 – 9100 – Telephone
(469) 262 – 2078 – Direct Line
(469) 665 – 9106 – Facsimile

Subject: Weinstein v. Copeland;
Date: Thursday, October 23, 2025 at 12:39:24 PM Central Daylight Time
From: Michelle Sortor
To: Copeland, Katie, quinnandpoppy@gmail.com
CC: Glynis Zavarelli

Ms. Copeland –

We have not received a response from you regarding clarification of the items you have circled in various pictures provided to us as to items which are being stored by Reign Restoration. Please provide clarification so that Reign can begin searching for same.

Please note: Reign Restoration has had possession of your items since September 26, and – per multiple requests/demands from you – none of these items have been cleaned. Reign Restoration is not a long-term storage provider. If you wish to have your items returned to you without being cleaned, please state so and provide the address and a time on October 27, 2025 when these items can be delivered to you. If you wish for your items to be cleaned by Reign (at no cost to you, although this does not constitute an admission of any kind, to include as to any particular condition of your items and/or as to liability) please let us know, and we will request that Reign Restoration add your items to the cleaning schedule.

We need to know by October 24, 2025 at 5 p.m. whether you wish to have Reign complete cleaning/remediation of your items, or whether you would like for your items to be delivered to you, along with the address and a time on October 27, 2025 for delivery of the items.

Regards,

Michelle Sortor

Michelle S. Sortor
Wentz & Zavarelli, L.L.P.
3120 Sabre Drive, Suite 170
Southlake, Texas 76092

(469) 665 – 9100 – Telephone
(469) 262 – 2078 – Direct Line
(469) 665 – 9106 – Facsimile

Exhibit D



The Worthington Renaissance Fort Worth Hotel
📍 200 Main Street, Fort Worth, Texas USA, 76102

Confirmation Number 1: 85759936

Your reservation is guaranteed to your Visa card.

Stay Details

STAY DATES	TOTAL FOR STAY	
Sun, Sep 28, 2025 - Mon, Oct 27, 2025	17937.19 USD	
ROOM TYPE	ROOMS	ADULTS
Suite, 2 Queen, Balcony	1	1
ROOM PREFERENCES	RATE	
No room preferences were selected.	Regular Rate	

Cancellation Policy

You may cancel your reservation for no charge before 11:59 PM local hotel time on September 25, 2025 (3 day[s] before arrival). Please note that we will assess a fee of 831.66 USD if you must cancel after this deadline. If you have made a prepayment, we will retain all or part of your prepayment. If not, we will charge your credit card.

Summary of Charges

Sun, Sep 28, 2025	469.00 USD
Mon, Sep 29, 2025	469.00 USD
Tue, Sep 30, 2025	469.00 USD
Wed, Oct 01, 2025	469.00 USD
Thu, Oct 02, 2025	469.00 USD
Fri, Oct 03, 2025	469.00 USD
Sat, Oct 04, 2025	469.00 USD
Sun, Oct 05, 2025	469.00 USD
Mon, Oct 06, 2025	469.00 USD
Tue, Oct 07, 2025	469.00 USD
Wed, Oct 08, 2025	469.00 USD
Thu, Oct 09, 2025	469.00 USD
Fri, Oct 10, 2025	469.00 USD
Sat, Oct 11, 2025	469.00 USD
Sun, Oct 12, 2025	469.00 USD
Mon, Oct 13, 2025	469.00 USD

Tue, Oct 14, 2025	469.00 USD
Wed, Oct 15, 2025	469.00 USD
Thu, Oct 16, 2025	469.00 USD
Fri, Oct 17, 2025	469.00 USD
Sat, Oct 18, 2025	469.00 USD
Sun, Oct 19, 2025	469.00 USD
Mon, Oct 20, 2025	469.00 USD
Tue, Oct 21, 2025	469.00 USD
Wed, Oct 22, 2025	469.00 USD
Thu, Oct 23, 2025	469.00 USD
Fri, Oct 24, 2025	469.00 USD
Sat, Oct 25, 2025	469.00 USD
Sun, Oct 26, 2025	469.00 USD
<hr/>	
Total Cash Rate	14,929.00 USD
Estimated Government Taxes and Fees	2,582.71 USD
State Cost Recovery Fee	120.93 USD
Local Government Fee	304.55 USD
<hr/>	
Total for Stay	17,937.19 USD

Exhibit E

Subject: Re: Urgent Request for Contact to Arrange Immediate Lodging – FHA Accommodation
Date: Tuesday, September 16, 2025 at 7:51:02 PM Central Daylight Time
From: Copeland, Katie
To: Michelle Sortor
CC: John Douglas, Glynis Zavarelli, 'Brochstein, Amye', Lile Benaicha, Pamela Quinn
Priority: High
Attachments: Hotel Drover .pdf, 9 Tax Exempt Form - color.pdf

Dear Ms. Sortor,

Your client's refusal to fund transport for my belongings to my apartment (per Ms. Zavarelli's call, Sept 11, 2025) led to my arrest for criminal trespass at Bowie House, despite my negotiated deal, and forced me back into a toxic mold unit (BioTex report, June 18, 2025) post-hospitalization, violating FHA § 3604(f)(3)(B). Your Holiday Inn offer fails to accommodate my disabilities (brain injury, MCAS, long COVID, and exacerbated injuries). I am exhausted, hungry, and facing compounding damages from ongoing exposure. *Hovsons, Inc. v. Township of Brick*(3d Cir. 1997) mandates prompt accommodations, as shown by my medical records and Aug 1, 2025, "Notice of Nonpayment."

I demand Hotel Drover (<https://www.hoteldrover.com/>) (negotiated a 2 week rate at \$549/night, attached) for therapy access, plus meals (\$50–80/day) and transport (\$30/day). The Drover attached a tax-exempt form for a 30+ day stay to save money. Provide a contact by 9:00 PM CDT today, per Texas Property Code § 92.056, or I will escalate my HRC complaint (FW-23-03, filed Aug 14) to HUD and seek a TRO, per *HUD v. Ross* (S.D. Ohio 2016).

Sincerely,

Kathryn Copeland

817-789-8498

From: Michelle Sortor <msortor@wandzlaw.com>
Date: Tuesday, September 16, 2025 at 6:16 PM
To: Copeland, Katie <K.M.COPELAND@tcu.edu>
Cc: John Douglas <john@jadouglaslaw.com>, Glynis Zavarelli <gzavarelli@wandzlaw.com>, 'Brochstein, Amye' <amye.brochstein@phly.com>, Lile Benaicha <lbenacha@weinsteinproperties.com>, Pamela Quinn <pquinn@weinsteinproperties.com>
Subject: RE: Urgent Request for Contact to Arrange Immediate Lodging – FHA Accommodation

[EXTERNAL EMAIL WARNING] DO NOT CLICK LINKS or open attachments unless you recognize the sender and know the content is safe.

Ms. Copeland – I have not had a response. I (and my client) can only be available for a short time period this evening, due to other obligations.

Please let me know immediately which hotel you would prefer of the options provided, so that we can arrange same. If I do not receive a response from you by 6:30 p.m., we will assume that you have secured alternate lodging for the evening.

Regards,

Michelle Sortor

Michelle S. Sortor
Wentz & Zavarelli, L.L.P.
3120 Sabre Drive, Suite 170
Southlake, Texas 76092

(469) 665 – 9100 – Telephone
(469) 262 – 2078 – Direct Line
(469) 665 – 9106 – Facsimile

From: Michelle Sortor
Sent: Tuesday, September 16, 2025 5:49 PM
To: 'Copeland, Katie' <K.M.COPELAND@tcu.edu>
Cc: John Douglas <john@jadouglaslaw.com>; Glynis Zavarelli <gzavarelli@wandzlaw.com>; 'Brochstein, Amye' <amye.brochstein@phly.com>; Lile Benaicha <lbenacha@weinsteinproperties.com>; Pamela Quinn <pquinn@weinsteinproperties.com>
Subject: RE: Urgent Request for Contact to Arrange Immediate Lodging – FHA Accommodation

Ms. Copeland – Weinstein will secure a reservation on your behalf at either the Holiday Inn – Fossil Creek or the Holiday Inn Fort Worth Downtown. Please indicate which of those hotels you would prefer, and I will coordinate to provide you reservation details.

Regards,

Michelle Sortor

Michelle S. Sortor
Wentz & Zavarelli, L.L.P.
3120 Sabre Drive, Suite 170
Southlake, Texas 76092

(469) 665 – 9100 – Telephone
(469) 262 – 2078 – Direct Line
(469) 665 – 9106 – Facsimile

From: Copeland, Katie <K.M.COPELAND@tcu.edu>
Sent: Tuesday, September 16, 2025 4:59 PM

To: Glynis Zavarelli <gzavarelli@wandzlaw.com>; Michelle Sortor <msortor@wandzlaw.com>;
'Brochstein, Amye' <amye.brochstein@phly.com>; Lile Benaicha <lbenacha@weinsteinproperties.com>;
Pamela Quinn <pquinn@weinsteinproperties.com>
Cc: John Douglas <john@jadouglaslaw.com>
Subject: Urgent Request for Contact to Arrange Immediate Lodging – FHA Accommodation
Importance: High

Dear Weinstein Properties,

I am entitled to reasonable accommodation under 42 U.S.C. § 3604(f)(3)(B) due to my disability, exacerbated by uninhabitable conditions (Texas Property Code § 92.052) confirmed by mold exposure, necessitating immediate alternative lodging. As established in *Hovsons, Inc. v. Township of Brick* (1997), such accommodations must be provided promptly to prevent irreparable harm. *Giebeler v. M & B Associates* (3d Cir. 1997) and *Schwarz v. City of Treasure Island*(11th Cir. 2007) further confirm that delays or failures to accommodate health-related housing issues violate FHA, especially with imminent risks. **Please provide the contact person to arrange a safe hotel room tonight**, including funds for transport and meals, and advise on required documentation.

Thank you for your immediate assistance.

Katie Copeland
817-789-8498 - Feel free to call or text

Subject: Re: Urgent ADA/FHA Accommodation – Omni Fort Worth
Date: Thursday, September 18, 2025 at 4:53:43 PM Central Daylight Time
From: Copeland, Katie
To: Glynis Zavarelli, Lile Benaicha, 'Brochstein, Amye'; Michelle Sortor, Pamela Quinn
CC: John Douglas
Attachments: image.png, image.png

Each time Weinstein insists on placing me at a hotel that I have already demonstrated is medically ineffective, that is not an “offer” — it is a separate denial of my requested reasonable accommodation under the FHA and ADA. You have been repeatedly notified (in writing and with exhibits) that I am medically fragile, that I lack funds and transportation to move my medical equipment, and that generic hotel placements are harmful. Those repeated refusals are willful, cause ongoing medical harm, and each constitutes its own violation.

TDLR has outlined the factors its prosecutors weigh in sanctioning violations: seriousness, willfulness, good-faith mitigation, history of past violations, deterrence, and justice considerations. Each factor weighs heavily against Weinstein here: you knowingly forced a disabled tenant into a condemned unit, acted in bad faith by repeating ineffective placements, and ignored clear medical documentation. This is not an isolated mistake — it is a pattern.

Finally, as these violations become more egregious, I ask you to clarify: who is actually making these decisions? Is it Weinstein Properties — a housing provider obligated to comply with the FHA? Or is it Ms. Zavarelli as counsel — who has independent duties under federal law and the Texas Rules of Professional Conduct? Either way, accountability will attach directly to the decision-maker.

Accountability and scope of duties

- Housing provider liability: Weinstein, as the housing provider, has the FHA duty to provide an effective, individualized accommodation (42 U.S.C. § 3604(f)(3)(B)) and to avoid interference (§ 3617). Counsel’s role does not shield unlawful decisions.
- Individual participation liability: Individuals who personally participate in discriminatory decisions can be liable under the FHA, including for aiding/abetting and interference (see DOJ guidance; cf. *Hovsons v. Township of Brick*).
- Counsel’s professional obligations: I understand counsel’s role, but directing or implementing decisions that deny effective accommodation or condition it on unrelated terms risks both FHA exposure and professional-conduct concerns (e.g., Texas Rules 4.04, 8.04).

I have repeatedly compromised and presented concrete proposals for safe, medically effective accommodations. Your responses have been limited to placements already proven ineffective. That is not compliance; it is ongoing discrimination. Compliance requires immediate effective accommodation, not further deflection. Another rejection of my carefully created requests is a knowing and intentional act to subject me to more time in a poisonous environment. At the very least, that would be considered duress in our “interactive process.” So I suggest you approve my request - even if just for a few days - so that we can have a better discussion.

Warmly,
Katie Copeland
817-789-8498

From: Copeland, Katie <K.M.COPELAND@tcu.edu>
Date: Thursday, September 18, 2025 at 1:16 PM
To: Glynis Zavarelli <gzavarelli@wandzlaw.com>, Lile Benaicha <lbenacha@weinsteinproperties.com>, Brochstein, Amye' <amye.brochstein@phly.com>, Michelle Sortor <msortor@wandzlaw.com>, Pamela Quinn <pquinn@weinsteinproperties.com>
Cc: John Douglas <john@jadouglaslaw.com>
Subject: Urgent ADA/FHA Accommodation – Omni Fort Worth

Dear Weinstein Properties and Counsel,

This is an urgent ADA/FHA accommodation notice. I recognize it may be difficult for others to fully understand the daily impact of my disabilities. I invite you to resolve this collaboratively because what I am requesting is not optional—it is a statutory requirement. I have attached a chart to help you understand my specific needs. In case you did not know, my access to prescribed home therapies and meal delivery services was cut off due to displacement, thus a per diem allowance and medically appropriate lodging are necessary accommodations. These supports are not luxuries; they are disability-related medical needs. A stable per diem ensures continuity of nutrition, hygiene, and therapeutic care until I am placed in ADA-compliant housing where services can resume.

I am willing to discuss reasonable compromises, but under the Fair Housing Act and Fort Worth Code §17-86, I am entitled to:

- Safe, ADA-compliant lodging of my choosing, not subject to arbitrary night-to-night extensions.
- A per diem or equivalent allowance to replace the loss of in-home therapies, nursing, and meal delivery caused by displacement.
- Assurance that retaliation will cease and that my housing stability will not be undermined for asserting these rights.

Enforcement & Regulatory Posture (for planning):

- **TDLR:** Investigator Ida Parmer (Investigator IV, Enforcement Division) confirmed this case was forwarded to the prosecution team on August 30; I am coordinating with their office.
- **City of Fort Worth:** I remain in active contact with multiple departments, including Code Compliance, Mayor's Committee on Persons with Disabilities, and the Human Relations Commission. While Code Enforcement has paused action pending TDLR's prosecution, they retain authority to declare the building uninhabitable to protect tenants.
- **Licensure prerequisites:** For ≥25 contiguous sq ft, TDLR notification is due ≥5 calendar days before remediation; protocol/work plan must be provided ≥1 day before any start. Please provide the notification number, start/stop dates, and current plan in advance. Ms. Zavarelli recently stated work would begin Monday, 9/22/25, but Investigator Parmer confirmed she has not received anything from The Bowery—meaning work cannot lawfully begin.

Accommodation Needed Today:

- **Hotel:** Omni Fort Worth (or functionally equivalent)
- **Check-in:** Today
- **Duration:** 3 weeks guaranteed, with option to extend through Oct 31, 2025
- **Rooming:** King suite now; transition to two adjoining rooms if my daughters return to my care
- **Supports:** Meal credits for medically appropriate diet; laundry access; portable HEPA

Medical Treatment Access:

Because of your recent refusal to provide effective accommodations, I was re-exposed to toxic mold for a week, worsening my condition. Immediate access to my treating physician, Dr. Johnson (Richardson), is also required. Approving transportation and treatment costs now prevents greater medical and liability exposure later. Four treating physicians have documented that mold exposure and displacement have significantly worsened my health.

Per Diem / Reimbursements:

- **Option A (actuals + prospective):** Reimburse past out-of-pocket food/transport (receipts / statements available) within 5 days. Going forward: \$80/day meals (federal M&IE) + \$30/day local transportation.
- **Option B (continuous per diem):** \$80/day meals and \$30/day local transportation from 6/27/25 through present and continuing until ADA-compliant permanent housing is secured.

Note: Laundry is separate from M&IE and will be reimbursed accordingly.

Deadline:

Please confirm the Omni booking and folio coverage, medical transport to Dr. Johnson, and your selection of Option A or B by **3:00 p.m. CT today, September 17, 2025**. Identify the decision-maker with full authority. Absent timely confirmation, I will treat further delay as ongoing discrimination and proceed with HUD intake via the City of Fort Worth and seek emergency relief.

Needs vs. Options

Needs vs. Options matrix (✓ met · Δ partial · ✗ not met)

Legend: ✓ Met · Δ Partial · ✗ Not met

Medical/Functional Need	Holiday Inn Express	Noblemen	Bowie House	Hotel Drover	Crescent	Omni	Permanent Relocation
Bathtub / hot tub (pain, POTS)	✗	✗	△ (hot tub across hall)	✓	✓	✓	✓
Therapy space (PT/OT/ST + caregivers)	✗	✗	✗	△ (suite possible or 2 rooms)	✓ Suite or 2 rooms available	✓ Suite or 2 rooms available	✓
Kitchen for anti-inflammatory diet	✗	△ (limited)	✗	△ (unknown)	△ (unknown)	△ No, but includes breakfast every day (more options than Holiday Inn)	✓
Washer/dryer for hygiene	✗	✗	✗	△ (No but hotel can do laundry for fee)	△ (No but hotel can do laundry for fee)	△ (No but hotel can do laundry for fee)	✓
Clean air / filtration (MCAS)	✗	✗	△	✓ (filters/PURE)	△ (unknown)	✓ More rigorous air maintenance + Portable air purification units	✓
ESA yard/patio (ground access)	✗	✗	✗	✗	✗	✗	✓
Stability (30+ days, not week-to-week)	✗	✗	△	✓ (negotiated rate + tax-exempt)	△ (unknown)	✓ At least 3 weeks - could likely negotiate	✓
Transportation provided / accessible location	✗	✗	✗	△ (central access)	△ (nearby restaurants and 7-11)	△ (nearby restaurants, free breakfast)	✓

Item	Exact ask	Why (medical/legal)	Approve
Hotel	Omni Fort Worth, 21 nights starting tonight; King suite → two adjoining rooms if needed; folio direct-billed	Hydrotherapy, clean air, stability; FHA/ADA effectiveness	<input type="checkbox"/> Approved
Meals	\$80/day per diem or equivalent meal credits adequate for anti-inflammatory diet	MCAS/Long COVID nutrition; FHA effectiveness	<input type="checkbox"/> Approved
Local transport	\$30/day stipend while displaced	Access to care/food; not included in M&IE	<input type="checkbox"/> Approved
Medical transport	Fund round-trip travel to Dr. Johnson (Richardson) for scheduled and follow-ups	Treating physician access post re-exposure	<input type="checkbox"/> Approved
Laundry	Hotel laundry covered or \$15/day stipend	Hygiene/MCAS triggers during multi-week stay	<input type="checkbox"/> Approved
HBOT	Authorize hyperbaric oxygen treatments, supplements, testing, etc. per Dr. Johnson's plan	Mitigate injury from re-exposure; prevent irreversible decline, significant cost savings	<input type="checkbox"/> Approved
Past expenses	Option A: reimburse actuals for food/transport since displacement; or Option B: per diem retro at \$80 + \$30	Stabilize nutrition/transport continuity; fair, simple administration	<input type="checkbox"/> A <input type="checkbox"/> B

I believe these are your only options:

Path	Up-front cost (21 nights)	Medical impact	Legal risk	Total exposure
Approve Omni + supports	Hotel + M&IE + transport + laundry + HBOT	Stabilizes; prevents irreversible decline	Low (meets FHA/ADA duties)	Predictable and limited
Place in HIE-type hotel	Lower room rate; no supports	Harm escalates; ER/relapse risk	High (ineffective accommodation + §3617)	High and compounding
Delay/deny	Near zero now	Worsening injury; specialty care required	Very high (HUD/DOJ, injunction, damages)	Maximized

Sincerely,

Kathryn (Katie) Copeland

Phone: 817-789-8498 | Email: k.m.copeland@tcu.edu

Legal Citations:

42 U.S.C. § 3604(f)(2) – Discrimination in terms, conditions, or privileges of rental housing

42 U.S.C. § 3604(f)(3)(B) – Failure to make reasonable accommodations when necessary

42 U.S.C. § 3617 – Interference, coercion, or intimidation in exercising rights

Fort Worth Municipal Code §17-86 (Ordinance 11075)

Why I Am Sending This Detail

As a courtesy, I have spelled out not only what accommodations I require but also **why each request is medically and legally necessary**. I am not obligated to provide this level of explanation under the ADA or FHA, but I have done so to streamline the process and make compliance easier for you. The attached chart further summarizes the needs → reasons → legal obligations, so there can be no confusion about what is required. I encourage you to engage counsel familiar with FHA and ADA laws because this ongoing conflict is causing much more harm to my health.

Subject: Urgent: Mold Issue & Health Concerns
Date: Wednesday, March 5, 2025 at 12:52:24 PM Central Standard Time
From: Katie Copeland
To: Bowery Southside

Hello, I never realized mold was so serious. I just asked ChatGPT about the mold and my unique constellation of diseases. It told me this was urgent and suggested I write the following:

I am reaching out to report a concerning mold issue in my apartment. I have noticed mold growing in the corner of my entryway, which raises concerns that there may be mold in other areas as well. Given my medical conditions, this is an urgent issue that could severely impact my health.

I have several chronic illnesses, including mast cell activation syndrome (MCAS), celiac disease, and long COVID, among others, which make me extremely sensitive to environmental triggers like mold. Mold exposure can cause severe allergic reactions, respiratory issues, immune system dysfunction, and increased inflammation, all of which could seriously worsen my condition.

Because of these health risks, I need an inspection as soon as possible to determine the extent of the mold issue and whether remediation is necessary. If testing confirms a mold problem, I will need immediate intervention to ensure my apartment remains a safe living environment.

Please let me know how soon we can schedule an inspection and discuss next steps. I appreciate your prompt attention to this matter, as it directly affects my ability to safely remain in my home.

Separate question: do you know anyone who does dog walking in our complex or nearby? I had a medical procedure done today and it would be great if I could pay someone to walk my dogs since I am not able to move much.

Best,

Katie Copeland
817-789-8498

Exhibit F

Subject: Re: Conference
Date: Tuesday, October 14, 2025 at 7:30:12 PM Central Daylight Time
From: Copeland, Katie
To: Glynis Zavarelli, Michelle Sortor

Dear Ms. Zavarelli,

I'm writing to clarify a few ongoing points of confusion.

I'm not sure why you've stated that I requested no cleaning be done. What I've actually asked for are details about how contamination is determined, what testing was performed, how it is done, and how decisions are being made about which items can be cleaned or must be discarded. You previously indicated that no testing was done, yet you also told the Court that my belongings were contaminated. That contradiction has left me unable to make informed decisions about my property.

It's also concerning that at least three different entities—Weinstein, Dedicated Mold, and Reign—were involved in packing and removing my belongings. I never gave consent for removal, and the unit was not ready to be packed. If I contact those entities directly, I expect they will say Weinstein authorized the action. Can you please confirm who specifically directed them and under what authority?

I also noticed an invoice referencing testing from the apartment, but I have not received those results. Please provide a copy of the findings. They are medically significant and necessary for understanding the extent of exposure and appropriate next steps for my treatment.

Finally, the front entry area that tested positive for black mold has still not been remediated. Can you explain why no remediation plan or work has been initiated in that area?

I also need an update on reimbursement for my relocation and medical

expenses. The continued delays and lack of cooperation are prolonging my displacement and increasing damages.

Thank you,

Katie Copeland
817-789-8498

On Oct 10, 2025, at 8:11 PM, Copeland, Katie <K.M.COPELAND@tcu.edu> wrote:

Dear Ms. Zavarelli,

Thank you for your message. I want to note that I have a documented **brain injury and significant vision impairments (including binocular dysfunction) that were caused and/or exacerbated by prolonged toxic mold exposure.** These conditions substantially affect my ability to read dense text, analyze and process information quickly, and manage multiple emails. It has been especially difficult without my medications and I cannot afford to replace them all so I have been having to adjust to changes, which have led to cognitive overwhelm happening more often and for longer time periods.

Accordingly, I respectfully request that future communications be **consolidated and written in clear, bulleted form where possible**, so I can review and respond accurately. This is a reasonable accommodation under the ADA and will help ensure effective communication between us.

Regarding your request:

- I am unsure whether the list sent Sunday evening is the complete list or if additional items need to be added. I am not sure what you mean about complete and whether the items can be cleaned. That is why I need your response regarding testing my items for contamination. I noticed an invoice where it said testing was done, but then you said it was not tested. I am confused since you told the court my items were contaminated and that is why they were taken.
- I just sent 3 emails with the documents showing the items and the page references you requested.
- You indicated earlier that you are opposed to me have counsel

appointed by the Court. Can you provide some insight as to why you do not want me to have an attorney? I am unsure of how to proceed if you are not agreeable to resetting the hearing date or for me to have appointed counsel appointed. As it is, my cognitive and communication-based disabilities prevent me from full and meaningful participation in the proceedings.

- My understanding of the last proceeding varies greatly from what was entered as a TRO against me and I am unclear on how none of the rulings granted to me were included in the order. As a result, I am unclear of what is even set for hearing on the 16th and why it is necessary. Can you please explain?

Thank you for your patience and cooperation. I remain committed to working in good faith and ensuring that all information is clear and accurate. However, it is unpredictable when my health will allow me to respond to pleadings and emails, so I am not able to commit to keeping emails during business hours.

Perhaps if we could settle the retaliation claim pending in the justice court, then I could obtain counsel to assist in the upcoming hearing. Or if we could reach some other kind of agreement, I could get treatment needed to improve my cognitive function. For example, the medications that were in the fridge were a few hundred dollars and are necessary to reduce inflammation in my body & brain.

How do you propose we make me whole enough to participate while I do not have a lawyer, per diem support, funds for treatment and replacement of missing items?

Sincerely,
Katie Copeland
(817) 789-8498
K.M.Copeland@tcu.edu

From: Glynis Zavarelli <gzavarelli@wandzlaw.com>
Date: Friday, October 10, 2025 at 10:15 AM
To: Copeland, Katie <K.M.COPELAND@tcu.edu>, Michelle Sortor <msortor@wandzlaw.com>
Subject: RE: Conference

[EXTERNAL EMAIL WARNING] DO NOT CLICK LINKS or open attachments unless you recognize the sender and know the content is safe.

Ms. Copeland:

We are opposed to the below request.

Additionally, as before, please email me/my office staff during normal business hours, as you have been doing with the Court staff. This will help to avoid any emails getting lost/buried.

I have also noted that you have not yet responded to my correspondence of Monday and my follow up email on Wednesday, requesting the complete list of items that you would like Reign to locate – or clarifying that you have determined the list you sent Sunday night (close to 10 pm) has been determined by you now, to be the complete list. I would also like you to confirm which filing you were/will be using (for the list you provided late Sunday night and for the “complete” list to the extent Sunday night’s list is not complete) to provide page numbers from which you were identifying items, so that as I discussed – I can get back in touch with you if even with a page identifier, the item itself is not readily identifiable (in which case I have indicated I will request further assistance to make sure the item is identified and Reign has complete instructions as to what to search for).

Thank you –

Glynis L. Zavarelli
Wentz & Zavarelli, LLP
3120 Sabre Drive, Suite 170
Southlake, Texas 76092
(469) 665-9100
Cell: (817) 832-3689

From: Copeland, Katie <K.M.COPELAND@tcu.edu>
Sent: Thursday, October 9, 2025 9:46 PM
To: Glynis Zavarelli <gzavarelli@wandzlaw.com>; Michelle Sortor <msortor@wandzlaw.com>
Subject: Conference

Would your client be opposed to the Court appointing counsel to represent me in the case in the 141st District Court?

Sincerely,

Katie Copeland

(817) 789-8498
K.M.Copeland@tcu.edu

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 107233189

Filing Code Description: Proposed Order

Filing Description: Proposed Order Granting Emergency Relief and Setting Submission

Status as of 10/23/2025 4:56 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Glynis L.Zavarelli		gzavarelli@wandzlaw.com	10/23/2025 4:53:17 PM	SENT
Michelle Sortor		msortor@wandzlaw.com	10/23/2025 4:53:17 PM	SENT
Kathryn Copeland		kcopelandlaw@gmail.com	10/23/2025 4:53:17 PM	SENT
Courtney Cotten		ccotten@wandzlaw.com	10/23/2025 4:53:17 PM	SENT
Rebecca Young		ryoung@wandzlaw.com	10/23/2025 4:53:17 PM	SENT
Krystina Hickey		khickey@wandzlaw.com	10/23/2025 4:53:17 PM	SENT
Kathryn Copeland		k.m.copeland@tcu.edu	10/23/2025 4:53:17 PM	SENT
Aayush Dhurka		adhurst@wandzlaw.com	10/23/2025 4:53:17 PM	SENT