A Guide to Fighting an Above Guideline Rent Increase RenovictionsTO.com - May 2021

In Ontario, rental units built before November 15, 2018 are subject to rent control, meaning landlords are allowed to increase rents once per year according to the guideline set by the <u>Government of Ontario</u>¹. Landlords can automatically increase your rent by this amount (no more than 2.5%) simply by notifying you on your N1 form. However, landlords can also apply for an above guideline increase (AGI) if they incur costs related to eligible capital expenditures or security, or if they saw a significant increase in property taxes. If they applied for an AGI, they must check the appropriate box on the first page of your N1.

In order for your landlord to increase your rent above the rent increase guideline, they must file an application with the Landlord and Tenant Board (LTB). That application begins a process that will end with the LTB delivering a ruling (unless the application is withdrawn). But tenants can fight an AGI, can take action throughout this process to fight back against their landlord. This guide will provide you with some information about what you can do to fight.

AGIs allow landlords to transfer certain costs onto tenants. They are part of landlord-friendly laws and allow landlords to increase their profits, even if they're already making lots of money. It's normal to be outraged that your landlord can try to raise rent so much despite the rent being so high already. Many tenants who face AGIs also deal with disrepair in their buildings and living spaces. But it's important to know that tenants can fight back and you're not alone. If you're facing an AGI then so are most, if not all, of the tenants in your building. There's strength in numbers, and when tenants come together and organize they may be able to have the AGI reduced, the application withdrawn, or have serious maintenance issues addressed.

Broadly speaking, there are two main ways tenants can fight AGIs:

- 1. Tenants can challenge an AGI at the LTB.
- 2. Tenants can put pressure on their landlord outside of the LTB process.

Some tenants who have challenged AGIs at the LTB have seen their AGI reduced significantly, have had a number of units dropped from the application, or—in very rare cases—have seen the AGI denied entirely. Typically, however, tenants who challenge an AGI at the LTB end up negotiating a relatively small reduction to the AGI.

Tenants have had success fighting AGIs by focusing on organizing outside of the LTB process. Such efforts have sometimes resulted in significant reductions to an AGI and AGIs being withdrawn entirely. However, even when organizing outside of the LTB process, it's important to understand the LTB process, participate in the process, and be prepared. Fighting an AGI outside of the LTB increases your chances of succeeding and strengthens your position as tenants, but if tenants do not attend hearings they risk having the AGI approved in their absence.

The next section briefly describes the AGI process. We then discuss how tenants can fight an AGI outside of the LTB process. Next, we move on to how tenants can challenge an AGI at the LTB. Note that tenants can fight an AGI outside the LTB process while also preparing to challenge the AGI at the LTB. The purpose of this guide is to give tenants information about ways to fight AGIs; it's up to tenants to decide how to allocate their time and energy, and which strategies may give you the best chance of success. This guide does not constitute legal advice; for legal advice, speak with a paralegal or lawyer.

Steps in the AGI Process

A landlord may apply for an AGI if they experience an extraordinary increase in property taxes and charges or if they incur costs related to security or eligible capital expenditures (including accessibility and environmental conservation). This guide will focus on AGIs in the second category because these are the most common cases and the ones tenants can fight.

An AGI allows the landlord to transfer the costs incurred onto their tenants. The landlord must file an L5 application with the LTB, where they document all of the costs incurred in order to justify the requested rent increase. There are various requirements these costs must meet, which will be discussed below. If the costs the landlord claims do not meet the relevant requirements, then the AGI may be decreased or even denied.

If your landlord applies for an AGI you will get an N1 notifying you of this at least 90 days before the proposed rent increase. The LTB will schedule a hearing for all of the tenants in your building subject to the AGI. You should receive notice about this hearing at least 30 days before it takes place. Tenants can contact the Landlord and Tenant Board directly for this information or find the information online by checking the status of their case here². Tenants can also get access to the landlord's application and supporting documentation.

Prior to the COVID-19 pandemic, the AGI process involved up to two in-person hearings at the LTB. At the first hearing, a mediator attempts to negotiate an agreement between the landlord and tenants. If no agreement is reached, a second hearing is scheduled, where an adjudicator hears the case and delivers a ruling.

During the pandemic, the LTB has used written hearings for AGIs. Tenants receive notice of the "hearing" and must submit a written response to their landlord's application within 30 days. The landlord is then able to respond to the tenants' response. As of May 2021, not much is known about this process, but it would appear to severely constrain the ability of tenants to argue their case and negotiate at the LTB.

An AGI must be approved by the LTB and issued via an order. Therefore, if your landlord is applying for an AGI, the increase they note on your N1 is not your legal rent. The amount your landlord is requesting that is above the rent increase guideline must be approved by the LTB.

You may wonder what rent to pay your landlord while this process unfolds, which can take months. Until the LTB issues an order, you need only pay your landlord what your rent would be with the regular guideline increase, whatever the percentage increase is for that year. If you and your neighbours are going to fight the AGI, you may decide to only apply the guideline increase to your rent and not pay your landlord the full amount they are seeking via the AGI application. If you decide to do this, we recommend you set aside and save the difference between what you pay and the full rent being requested by your landlord in the AGI application. This is because at the end of the process, you will have to retroactively pay any difference between your rent with only the guideline increase and the rent that the LTB grants your landlord, in the event such a difference exists.

Organizing to Fight Outside the LTB

Tenants have shown that putting pressure on landlords can be extremely effective when fighting AGIs. For example, tenants in Parkdale organized successfully to oppose AGIs in 2017 and 2018.

More recently, tenants in the West End saw their landlord withdraw the AGI application after issuing a collective demand. Here, we describe some of the tactics that have been a part of successful fights. However, keep in mind that each case is unique and you and your neighbours have to decide for yourselves which tactics may be most effective.

The most important thing is that tenants have to organize in their building and get as many tenants involved in the fight as possible. Door-knocking and lobby or front lawn meetings can help tenants connect and discuss the AGI and collective actions that they can take. You can maintain communication through a WhatsApp group, email chain, Facebook group, door-knocking, phone tree, or other system that works best for you and your neighbours. You don't necessarily need everyone in the building to be involved, but the more tenants involved the stronger your position is.

While preparing to fight an AGI, try to learn as much as possible about your landlord. Are they an individual or a large investment vehicle? If it's the latter, are some of the main investors pensions and unions? Do they own a single apartment building or dozens throughout the city? How have they dealt with tenants in the past, including regarding AGIs? This information can help you choose the actions that are most likely to help in your fight and give you an idea of what to expect from your landlord. Some landlords may prefer to avoid confrontation, while others will be more ideologically driven and may try to harass and intimidate organizing tenants. Two other things are important to keep in mind. First, whether big or small, landlords are businesses that care about their public image, run by individuals who care about their reputations. Second, in most cases landlords are making very good profits even without charging you extra. Your landlord almost certainly doesn't need the money they're trying to recoup via the AGI, but they will be happy to take it if it's easy for them to do so. If you and your neighbours fight back effectively, your landlord may decide that the costs of pursuing the AGI outweigh the benefits.

Successful fights have involved tenants organizing together, making collective decisions, and taking collective actions to put pressure on their landlords, increasing the pressure as the campaign goes on.

A common first step for tenants is to issue a collective demand to their landlord to drop the AGI. Here, tenants draft a collective letter and collect signatures from as many tenants in the building as possible, then deliver the letter as a group to their landlord. Delivering the letter in person is most effective, even as a small group of tenants. If there are other issues in the building that tenants want addressed, such as maintenance, they may include these in the demand letter and attach maintenance requests from their neighbours.

There's strength in numbers, and one thing that can help your fight is support from other tenants. Look into whether your landlord owns other buildings in your area (or even elsewhere in the city)—tenants in those buildings may also be facing AGIs or are likely to be in the near future. You can distribute flyers in those buildings or put up posters outside to let tenants know about what you're facing; this can lead to tenants in those buildings getting organized and build solidarity. This also sends the message to your landlord that you're organized and prepared to stand up to them.

Conducting rallies or demonstrations can help grow community support while also bringing attention to what your landlord is doing. Banners displayed on balconies and signs in apartment windows can being attention to your fight and encourage neighbours to reach out and support. Tenants facing AGIs often live in buildings that are poorly maintained and face being displaced if the AGI is granted—many tenants will be vulnerable people who have lived in the building for

many years. It's also relatively well-known that landlords often apply for AGIs in order to price out older, rent-controlled tenants so that they can then raise rents to market rates. Media coverage and public support for tenants will put pressure on your landlord to back down entirely or negotiate a significant reduction to the AGI. For example, tenants in Parkdale rallied at their landlord's office while delivering a stack of maintenance requests, <u>drawing attention</u>³ to the disrepair of their buildings and the unfair rent being requested by the landlord. Other tenants have appeared at industry events their landlord was participating in, or at municipal hearings where an application submitted by their landlord was being considered—these types of events are opportunities for tenants to plan actions.

Tenants can also rally community support and put pressure on their landlord by organizing a phone and email zap, like <u>this one</u>⁴. Such campaigns can show your landlord how much community support there is behind the tenants and that the costs of continuing with their AGI may be high.

Another way to increase pressure on your landlord by inviting scrutiny and rallying public support is to distribute flyers throughout the landlord's neighbourhood or business community. Most landlords realize that their actions—trying to raise rent by so much, displacing vulnerable, long-standing tenants—will be frowned upon by others. Applying to raise rents through the LTB is one thing, but having their actions publicly revealed may elicit basic human emotions such as shame. Meanwhile, if your landlord is a large investment fund, there may be certain institutional investors who are uncomfortable displacing tenants through an AGI. You can find examples of flyers that have been used here and here and here.

Finally, staging a rent strike can be an effective way to put pressure on your landlord. The most successful fights in Parkdale have involved the above tactics combined with rent strikes. A rent strike is not simply a matter of withholding your rent; it requires notification, publicity, and the commitment of a significant proportion of tenants to be effective. However, it's important to note that rent strikes carry significant risks for tenants, as tenants can be evicted for failing to pay rent. If you and your fellow tenants are considering a rent strike, it's important that you not only understand the risks involved, but understand the eviction process and how to navigate that in the event your landlord threatens eviction—landlords will often try to manipulate tenants who do not fully understand their rights when facing eviction. For more information about rent strikes, contact Cole Webber⁷, one of the organizers who supported rent strikers in Parkdale. For more information about tenants rights and the eviction process, please see the legal resources listed below. For more information about the successful organizing in Parkdale, see the newsletters posted here8.

Any action tenants take to stand up for themselves may face retaliation from their landlord. Tenants who lead organizing efforts may be unfairly targeted by their landlord and threatened with eviction. It's important that tenants understand what risks their actions carry, but also that they understand their rights. There are legal resources listed below that can help tenants understand their rights and also provide assistance if they are threatened with eviction.

And remember that tenants must participate in the process set out by the LTB for handling AGIs. The sorts of organizing efforts described in this section will be of no use if tenants are not diligently pursing their fight at the LTB. In fact, the timeline of the legal process and hearings can inform and guide any organizing efforts to put pressure on your landlord, if those actions are going be most effective.

Challenging an AGI at the LTB

According to the current laws and regulations regarding AGIs, the LTB will grant a landlord their AGI unless the costs claimed in their application do not meet the necessary requirements or there are serious maintenance problems in the building or in the units impacted by the AGI. This means that tenants can pursue two main strategies to fight an AGI at the LTB. First, tenants can scrutinize the landlord's application to see if the costs claimed meet the necessary requirements. Second, tenants can document maintenance problems in the building and collect evidence to show that the landlord has failed to adequately maintain the building. There are resources available—discussed below—to help tenants do both of these things.

The reason you and your neighbours may want to closely examine your landlord's application and supporting documentation is that landlords have been known to include things in the AGI application that do not belong. Basically, they may include costs that are not eligible or include apartments that are not impacted by the relevant work and so should not face an AGI. Tenants can't depend on the LTB to review the application as closely as required to catch the things your landlord may try to slip in.

The LTB's Interpretation Guideline⁹ for AGI applications clarifies what sorts of expenses are eligible for inclusion in the application and provides details about when costs are ineligible. The sorts of things you will be looking for are the time frame of the work, making sure the work involved necessary capital expenditures (as opposed to, for example, merely cosmetic work), verifying whether the work was actually completed and paid for, making sure the cost of labour was reasonable, making sure the work was actually needed (and whether the landlord has demonstrated this), and making sure the apartments listed in the application are impacted by the work. The landlord has a legal obligation to provide you with the supporting documentation you will need to examine their application. For more information on reviewing these documents, you can see this helpful guide¹⁰ put together by the Akelius Tenants Network.

Reviewing your landlord's application and supporting documentation can result in a decrease of the AGI if there are costs included that should not be there. Whether you raise these concerns in the hopes of negotiating a decrease or appeal to the LTB directly at the second hearing or in a written hearing may depend on the strategy you and your neighbours choose. There are a couple of things that are important to keep in mind, though. First, the reduction to the rent increase that results from this work is typically minor. There have been cases where certain apartments are dropped from the application or there's a significant reduction in the rent increase, but more often than not removing ineligible costs will only result in a small reduction to the AGI. Second, work that seems cosmetic or unnecessary to you may not be deemed cosmetic or unnecessary by the LTB. Meanwhile, when a project is deemed to have started and ended can be counterintuitive. For these reasons, tenants may seek out the help of a paralegal or lawyer to take on their case or at least review their landlord's application and supporting documentation.

Hiring a paralegal or lawyer to represent you and your neighbours may be helpful when fighting an AGI. The Federation of Metro Tenants' Associations can help you apply for a grant from the City of Toronto to pay for a paralegal. However, there are a few important things to note about hiring someone to help with an AGI. First, many legal representatives are unlikely to devote much time and effort to your case because the pay is likely less than they are accustomed to. Even if you find a good paralegal who is willing to fight for you, they may only be willing to go so far and be uninterested in a drawn out process that could potentially lead to a better outcome for you. Second, you can't depend on a paralegal to do all of the work for you. A paralegal can help,

but tenants still need to organize, strategize, fight for themselves, and do what they can to oppose the AGI. And while the paralegal may offer legal advice to tenants, at the end of the day it's up to tenants to direct their representative on how to go about things and to lead the effort. Third, the vast majority of AGI cases end at the mediation hearing, where there is a legal duty to negotiate and try to reach an agreement. A paralegal who sees it as their duty to reach an agreement and doesn't think they are getting paid much is likely to settle at mediation rather than continue to another hearing. Often, this will result in only a minor reduction of the AGI, if anything. This is not meant to say that paralegals won't do their best but simply to recognize that they also have limited resources.

If tenants truly want to fight the AGI, then they may decide it's better for them to fight the AGI on their own rather than have someone paid to represent them. Putting up a real fight will take time and draw out the process, and a paralegal who sees the fee they're getting as insignificant may not be willing to stick it out for the long haul. This is not to say that you should not get a paralegal or rely on legal advice. A paralegal may help you examine the landlord's application and provide sound advice about how to fight. But it's important to keep in mind what you hope to achieve and what the paralegal in question is willing to do for you. Note, too, that written hearings may place less of a burden on a legal representative than a couple of in-person hearings.

The second way to challenge an AGI at the LTB is by arguing that your landlord has failed to adequately maintain the building. The rules regarding AGIs state that an application may be delayed or dismissed if there are serious maintenance problems in the building or in certain units included in the application. If the case goes to the second hearing, the LTB can also rule to remove certain units from the application or grant the AGI only on the condition that the maintenance problems are fixed.

Before discussing how to challenge an AGI by documenting maintenance problems, there are a few important things to note. First, this strategy is untested. While tenants have often documented maintenance issues as part of their organizing outside of the LTB to put pressure on their landlord or to negotiate a reduction to the increase, there is not much of a track record of tenants trying to have an AGI denied at the LTB on these grounds. Second, according to the rules regarding AGIs, the maintenance issues must be serious and there's no guarantee that the application will be dismissed by the LTB even if such issues are present. Third, even if the maintenance issues are deemed serious enough by the LTB, it's possible that only units impacted by the serious maintenance problems will see the AGI dismissed or that the AGI will be granted on condition that the maintenance issues be resolved.

At the end of this guide there are templates for logging maintenance problems. You and your fellow tenants can use these templates to create a log of the various maintenance issues in your building, whether these are within rental units or common areas. First, there is a template for notifying your landlord about a maintenance issue. Notify your landlord as soon as problems arise. Edit the template to include your landlord's correct address and the address of your building. Be sure to keep a copy of any letter sent to your landlord for your own records. If your building has its own digital system for submitting maintenance requests then you can use that system instead of the template; however, be sure to keep a printed copy of any maintenance request sent. Second, there is a template for logging each maintenance issue in detail. Use this template to keep a more detailed record of each maintenance problem and any correspondence with your landlord, as well as recording whether the issue is outstanding or resolved. Attach photographs (if possible) to create a file for each maintenance issue. Third, collect all of this documentation together in a binder or folder in order to have a complete log for your building.

It's helpful to have all of this information gathered together. It's also important to have hard copies (i.e. printed rather than digital) because that's what you will need for the hearings. Contact us¹¹ for versions of these templates in Word.

The current rules regarding AGIs state that the LTB can take various measures if the landlord is in serious breach of their maintenance obligations. A landlord's responsibility to adequately maintain a building is set out in the <u>Residential Tenancies Act¹²</u> (see Section 20, Paragraph 1). The act also outlines that a serious breach of this obligation is relevant when considering an application for an AGI (see Section 126, in particular Paragraph 12). If possible, tenants should cite these documents and sections when presenting their case at the hearings.

The rules note that in order to be relevant to an AGI application, the maintenance issues must be serious and ongoing. However, what constitutes a serious breach of a landlord's maintenance obligations is not made fully explicit in the law. The LTB interprets "serious" to mean "substantial and ongoing and not merely minor, trivial or of passing concern" and something which "adversely, materially and substantially, affects a tenant's enjoyment of the rental unit." Rulings in previous cases set precedents for what may or may not be considered a serious maintenance problem. Malfunctioning or broken windows and doors, flooding or water leaks from the ceiling, and pest problems are all things that may be considered serious. While it may be useful to review previous cases to see what has and has not been considered a serious breach, it's not at all necessary to do this. Logging all maintenance issues is a worthwhile activity, and common sense is a good guide to what may be considered serious. If it really prevents you from enjoying your living space or being comfortable in your home, if it puts your health and safety at risk, or if it prevents you from easily accessing your apartment (e.g. persistent elevator problems), then it's reasonable to view it as a serious issue. (Previous cases can be found here¹³. It's worth noting that while previous cases are a good guide and it's likely that "serious" will be understood similarly across cases, there's no guarantee that what was deemed a serious breach in one case will be considered as such in the context of an AGI.)

Whether or not a landlord is found to be in serious breach of their maintenance obligations is not simply a matter of the seriousness of any particular maintenance problem(s). Maintenance problems will only be considered relevant to an AGI if they are existing and unresolved. It's also important that the landlord has been made aware of the issues but has failed to adequately address them in a timely fashion. Importantly, a landlord may be considered to be in serious breach if they have failed to address a number of non-serious issues they have been made aware of. The LTB's Interpretation Guideline states that: "A landlord who has been given notice and failed to make a number of minor repairs within a reasonable time, or repeatedly ignores requests for necessary repairs and maintenance may be found to be in serious breach. This is so even if each one of the minor repairs...would not be considered severe." (For example, see this case¹⁴, Paragraph 24 and this case¹⁵, Paragraphs 16-26.)

In summary, whether a landlord is found to be in serious breach of their maintenance obligations depends on a number of factors: the seriousness of the maintenance problems, whether or not the problems are existing at the time of the AGI application, whether the landlord is aware of the issues and has made adequate efforts to repair them, and whether there is an accumulation of many maintenance problems.

With a log of their building's maintenance problems in hand, tenants can decide how they want to proceed in response to the AGI. Tenants may try to execute one of three general strategies. Which avenue is most promising, or appropriate, will depend on a number of factors specific to the case in question, including the seriousness of maintenance issues, the number of

maintenance issues, the specific goals of the group of tenants, the negligence of the landlord, and the identity and track record of the landlord. For legal advice, speak with a paralegal or lawyer.

First, tenants may try to use the maintenance issues to draw out the hearings process and put pressure on their landlord in the hopes that they will back down, using the sorts of direct action discussed earlier. Signing up dozens of tenants to appear before the adjudicator as witnesses can draw out the process and cost your landlord in legal fees. Refusing to negotiate at the first hearing and building a case around maintenance problems can also give tenants time to put pressure on their landlord through other organizing efforts.

Second, tenants may choose to negotiate at the first hearing, using the maintenance issues to negotiate a reduction in the AGI. If the maintenance problems are not so numerous and/or as serious as can be, or if you worry your landlord may fix the problems prior to the second hearing, then your log may be more valuable in negotiations than at the second hearing, as it may be unlikely for the adjudicator to rule in your favour. A big log of existing issues can shake a landlord's confidence and make them willing to accept a more significant reduction in the AGI through negotiation.

Third, tenants may state at the first hearing that they're not interested in negotiating and move on to the second hearing to present their case to the adjudicator in the hopes of having the application dismissed or the AGI granted only on condition that repairs are made. If there are a number of significant maintenance issues in your building that you would like to have resolved, then you may want to go to the second hearing to try to ensure that, at a minimum, repairs are made. This is particularly true if your landlord has known about the issues for some time and has failed to address them. If your landlord has been negligent, you can use the AGI to try to force them to address longstanding issues. And if the maintenance issues are serious and/or numerous enough and you have evidence the landlord has been negligent, you may be able to have the AGI dismissed.

If pursuing this third strategy, it's important to show that the landlord already knew about the problems prior to the hearings. That's because if the landlord can show that they were unaware of the maintenance problems you have logged, then it's likely they will simply be ordered to repair them and the AGI will be granted. If you can show that letters have been sent to the landlord or that the landlord was aware of the issues for some time and has not addressed them, then you're fine. But if there are new maintenance problems or some that the landlord has not been notified about, then you may want to send a disclosure letter to your landlord. At the end of this guide there is a template for such a disclosure letter. The letter notifies your landlord of your intention to oppose the AGI on the grounds of their failure to maintain the building and lists the existing maintenance issues. There is no need to send the letter if you have evidence the landlord has already been notified of the existing issues, and there is no obligation to send it if there is no order to do so from the LTB.

Resources

However you choose to fight back, there are resources available to help tenants.

Cole Webber is an organizer with experience helping tenants fight AGIs. You can contact him for help with organizing against your landlord to fight an AGI and to learn more about different things tenants can do to stand up to their landlord: webberc@lao.on.ca

The Federation of Metro Tenants' Associations is a non-profit organization advocating for tenants. They can help you set up a tenants association and apply for a grant to get legal representation to fight an AGI. For more information, see their website: https://torontotenants.org/

The Akelius Tenants Network is a group of tenants organizing to support tenants throughout Toronto, in particular those living in buildings owned by Akelius Canada Ltd. They have produced informational guides about AGIs and how to fight them. You can access these guides and contact them at: https://www.akeliustenants.org/

For legal advice or assistance, you can contact the Community Legal Clinic that services your community, which you can find here: https://www.legalaid.on.ca/en/contact/contact.asp?type=cl

You may also be able to find legal assistance and information via Community Legal Education Ontario: https://www.cleo.on.ca/en and the Advocacy Centre for Tenants Ontario: https://www.acto.ca/

The templates mentioned in the above guide appear on the following three pages. First is the template for notifying your landlord about a maintenance issue. Next is the template for logging each maintenance issue in detail. Last is the template for the disclosure letter. You can copy these templates and paste them into new documents, then edit accordingly.

Date	
To:	
Albert's Property Management Inc. 555 Whatever Street, Unit 0 Toronto, ON M1O 1O1	
My name is	I am a tenant at 555 Camus Avenue
apartment #	
I have the following concern(s) about mai	ntenance and repair in my building/unit:
Thank you for your prompt attention to the	e above noted matter(s).
Sincerely,	
Signature	

MAINTENANCE LOG

Maintenance issue:
Location (where in the building/in which unit(s)):
Description of issue:
Photo attached? □ Yes □ No
Landlord notified of issue in writing on:/ (mm/dd/yyyy)
Copy of notice sent to landlord attached? □ Yes □ No
Response from landlord received on:/ (mm/dd/yyyy)
Action taken by landlord:
Additional comments (include here any further correspondence with landlord, dates of correspondence, and note if copies of correspondence attached):
Has this maintenance issue been resolved? □ Yes □ No
If yes, when: / / (mm/dd/yyyy)

[insert name and contact information of landlord]

[insert name(s) and contact info of sender/group]

[insert date]

Dear [insert landlord name]:

We, the undersigned tenants, are contesting your application for an above guideline rent increase on the grounds that you have not satisfied your maintenance obligations.

The ongoing maintenance problems affecting units included in the application for the above guideline rent increase include:

[-list all

-]

We consider the failure to repair these issues to be a serious breach of your maintenance obligations.

Best regards,

- 4 https://twitter.com/ParkdaleOrg/status/1240630633208188930
- ⁵ http://parkdaleorganize.ca/2018/02/20/michael-marsha-lax-drop-the-agi-at-1251-king-do-the-repairs-now/
- ⁶ https://toronto.citynews.ca/2017/06/03/1590387/
- ⁷ webberc@lao.on.ca
- 8 http://parkdaleorganize.ca/this-is-parkdale/
- 9 https://tribunalsontario.ca/documents/ltb/Interpretation%20Guidelines/14%20-%20Applications%20for%20Rent%20Increases%20above%20the%20Guideline.html
- ${}^{10}\,\underline{https://www.akeliustenants.org/tenant-resources/above-guideline-increases-AGIs/how-to-refute-an-agi-application}$
- ¹¹ info@renovictionsto.com
- 12 https://www.ontario.ca/laws/statute/06r17
- 13 https://www.canlii.org/en/on/onltb/

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https://www.canlii.org/en/on/onltb/doc/2014/2014canlii23584/2014canlii23584.html?search UrlHash=AAAAQAQInNlcmlvdXMgYnJlYWNoIgAAAAAB&resultIndex=2

¹ https://www.ontario.ca/page/rent-increase-guideline

² https://tribunalsontario.ca/ltb/check-file-status/

³ https://www.thestar.com/news/gta/2017/03/17/parkdale-tenants-rally-in-face-of-rent-increases.html

¹⁵ https://www.canlii.org/en/on/onltb/doc/2012/2012canlii21575/2012canlii21575.html