



THE COMPLETE GUIDE

KEEPING AI COMPLIANT

The Fair Housing & Client Data Shield — audit every AI draft for language that describes people instead of property, keep client information out of AI training data, and run the workflow that makes both habits automatic.

EB Bogen.AI
EDMUND'S MASTERMIND

KEEPING AI COMPLIANT

THE FAIR HOUSING & CLIENT DATA SHIELD

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AI-GENERATED LISTING
4-BEDROOM FAMILY HOME
MAY DISCRIMINATE BASED ON
FAMILY STATUS

Audit the Copy → Guard the Data → Review Before It Ships → Protect the License

PREPARED BY EDMUND BOGEN

How the shield works

Three layers, one goal — use AI without putting your license or your clients at risk.

The shield is not about avoiding AI. It's about using it in a way that protects your clients, your license, and your brokerage — watching what comes out, watching what goes in, and running a loop that makes both automatic.

THE THREE LAYERS

1. **Watch what comes out** — every AI draft gets audited for language that describes people instead of property, before it publishes.
2. **Watch what goes in** — client identity and finances never enter an AI chat; anonymized shapes of situations do.
3. **Make it automatic** — a five-step loop (draft, review, verify, document, disclose) that runs the same way every time.

The standard you're held to

Principle	What it means
You own what you publish	HUD confirmed in 2024 that fair-housing rules apply to AI-generated advertising. Responsibility sits with the licensee who publishes — not with the tool.
The reasonable-reader test	The measure is what an advertisement indicates to a reasonable reader — not what you intended when you posted it.
Property, not people	The working rule from NAR's fair-housing guidance: describe the property and its verifiable features, never the people who might live there.
State lists go further	Federal law names seven protected classes; many states and localities add more. Your state's list is the one you work under.

EDUCATION, NOT LEGAL ADVICE

This guide is educational material prepared for Edmund's Mastermind. It is not legal advice, and it is not a substitute for your broker's policies, your MLS rules, your state license law, or a qualified real-estate attorney.

THE 3 SYSTEMS



1 • THE FAIR HOUSING FIREWALL
audit every word before it ships



2 • THE DATA LINE
what never goes into AI



3 • THE COMPLIANCE WORKFLOW
review · document · disclose



⚡ Why this session matters

While AI writes listing copy for half the industry, the Fair Housing Act hasn't moved an inch — and HUD confirmed in 2024 that it applies to AI-generated advertising exactly as it applies to anything you type yourself. The model will hand you "perfect for young families, walking distance to the church" in flawless marketing prose, because it learned from decades of copy written before anyone audited those phrases. You publish it, you own it.

An unreviewed AI draft ships with whatever the model guessed — including quiet signals about who "belongs" in the home and the neighborhood.

A shielded workflow catches people-language before it publishes, keeps client financials out of training data, and leaves a record that protects you.

None of this takes a law degree. It takes three habits, installed once — and this guide installs them.

🎯 What you'll learn

We will master 3 systems live, together:

1 • The Fair Housing Firewall — where AI-generated copy drifts into fair-housing risk, the red-flag phrase categories, the property-not-people rewrite rule, and the review prompt to run on every draft before it ships.

2 • The Data Line — what never goes into an AI chat, how consumer tiers may train on your inputs while business tiers don't, the settings that matter, and the anonymization habit ("Buyer A, \$1.2M budget").

3 • The Compliance Workflow — the protection loop: the human-review gate, the contrastive review prompt, the prompt-draft-final paper trail, simple disclosure language, and the recovery steps when something slips.

System 1 | The Fair Housing Firewall

Audit what comes out of AI — before it publishes.

Why AI drifts into risky language

Language models learned to write listing copy from decades of published marketing — including the years when "sell the lifestyle" was standard advice. The model isn't checking the Fair Housing Act; it's predicting what listing copy usually sounds like.

That's why the riskiest sentences are often the ones that read most naturally — and why they arrive with total confidence.

The protected classes

Level	Protected classes
Federal (Fair Housing Act)	Race, color, religion, sex, national origin, familial status, disability.
Many states & localities add	Age, marital status, sexual orientation, gender identity, source of income, military status, and more — check your own state's list; it's the one you work under.

The working rule

Describe the **property**, not the **people**. Verifiable features, factual distances, real amenities — never who the home is "for," how safe an area is, its demographics, or its religious landmarks.

REMEMBER

Red-flag phrases are signals to rewrite, not an automatic violation list — context matters, and the standard is what the ad suggests to a reasonable reader, not what you intended. When a phrase sits in a gray zone, rewrite it anyway or ask your broker before publishing.

The copy-audit checklist

Read every AI draft looking for these six red-flag phrase categories.

Category	Sounds like	The risk
Who-it's-for language	"Perfect for young families" · "ideal for empty nesters" · "great starter home for a young couple"	Familial status and age — tells readers who belongs, and steers who inquires.
Safety & neighborhood character	"Safe neighborhood" · "low-crime area" · "desirable area"	Coded language that regulators and courts can read as racial or ethnic steering.
Religious landmarks & references	"Walking distance to the church" · "near the temple" · "close-knit faith community"	Religion — signals a preference through geography.
Exclusivity & status language	"Exclusive community" · "private enclave" · "prestigious residents"	Implies some people are excluded — keep the amenity, drop the exclusivity.
Ability & family-structure assumptions	"Not suitable for wheelchairs" · "perfect for mom and dad" · "walk-up — great exercise"	Disability and familial status — describes bodies and households instead of the home.
Ethnicity & national-origin flavoring	"Authentic [any nationality] neighborhood" · "traditional immigrant quarter"	National origin — characterizes the people of an area rather than the property.

MY LISTING'S FLAGS

Run your current listing copy through the six categories and note what you find:

The property-not-people rewrite rule

Every red-flag phrase has a compliant twin — the verifiable feature was always the real selling point.

Instead of	Write
"Perfect for young families"	"Four bedrooms, fenced backyard, three blocks from Lakeside Elementary"
"Safe, quiet neighborhood"	"Cul-de-sac lot on a low-traffic street"
"Walking distance to the church"	"Within a mile of parks, shops, and dining"
"Exclusive gated community"	"Gated entry, community pool, and tennis courts"

The review prompt — run it on every draft

Act as a fair-housing compliance reviewer. Read the listing copy below and flag every word or phrase that describes people rather than property – including who the home is "perfect for," any reference to protected classes (race, color, religion, sex, national origin, familial status, disability, plus my state's additional classes), safety or neighborhood-character coding, religious landmarks, and exclusivity language. For each flag, explain the risk in one sentence and rewrite the phrase to describe a verifiable feature of the property instead. Do not add any new claims I have not given you. Return the fully corrected copy at the end.

REMEMBER

The AI review is a second set of eyes, never the last one — a person reads every word before it publishes (System 3).

MY REWRITES

Take two flagged phrases from the previous page and write their property-not-people twins:

System 2 | The Data Line

Watch what goes in — client data never trains a model.

Your clients trusted you with their identities, finances, and negotiating positions. None of that belongs in an AI chat — on any tier, under any setting. What crosses the line instead is the anonymized **shape** of the situation.

The never-share list

- Client names paired with finances — income, assets, debts, credit
- Social Security numbers, dates of birth, and ID or license numbers
- Pre-approval letters and lender correspondence
- Contract terms while a deal is open — offer amounts, inspection negotiations, deadlines tied to a party
- Negotiation positions — what your client will really accept
- Anything a client asked you to keep private

How AI tiers treat your inputs

Tier	How inputs are treated
Consumer (ChatGPT Free, Plus, and Pro on a personal account)	Conversations may be used to train future models by default. Opt out: Settings → Data Controls → "Improve the model for everyone" → off.
Business (ChatGPT Business/Team, Enterprise, Edu, and the API)	Inputs and outputs are not used for training by default, and a data-processing agreement is available.
Every other AI tool	Policies differ and change. Open each tool's data controls, verify the training setting yourself, and re-check after major updates.

TWO CAUTIONS

Opting out stops future training but does not remove what you already sent — and a toggle checked once is not checked forever. Verify the setting on every account and device you use.

The anonymization habit

Strip the identity, keep the shape of the situation — add the real details back later, in your own document.

Buyer A, \$1.2M budget, relocating from NY, needs to close before the school year.

That one sentence gives the model everything it needs to help — and nothing that identifies anyone.

The real detail	What the AI gets
Client's name	"Buyer A" / "my seller"
Exact address	"a 4-bed in a gated Boca community"
Financial documents	Only the one number the task needs — "budget \$1.2M"
Personal story	Only the relevant fact — "relocating from NY"

The safe-input checklist

GREEN — PASTE AS-IS	CAUTION — ANONYMIZE FIRST	NEVER — NO TIER, NO SETTING
- Public listing data and MLS-published facts - Your own marketing drafts - Anonymized client scenarios - General market and how-to questions - Template and checklist requests	- Client situations and timelines - Offer-strategy scenarios - Financial ranges tied to a person - Anything pairing an address with a person - Emails you're rewriting — strip names first	- SSNs, DOBs, and ID numbers - Names + finances together - Pre-approval letters - Open contract terms and bottom lines - Passwords and login credentials

Broker policy & client consent

The Data Line works best when the whole office draws it in the same place.

KNOW YOUR BROKERAGE'S POLICY

Find out whether your brokerage has an AI-use policy. If it doesn't have one yet, the My Office AI Rules worksheet at the end of this guide is the starting draft to bring to your broker.

SET EXPECTATIONS EARLY

One line in your engagement conversation does it:

We use AI tools to help draft marketing. We never share your personal or financial information with them, and everything is reviewed by our team before it goes out.

HONOR THE ASK

If a client asks that AI not be used on their file, honor it — and note it in the file.

Worksheet — my data line

THE AI TOOLS I USE TODAY, AND THE TIER EACH RUNS ON

THE TRAINING SETTING I NEED TO VERIFY, AND WHEN I'LL DO IT

THE LAST THING I PASTED INTO AN AI CHAT THAT SHOULD HAVE BEEN ANONYMIZED

MY ENGAGEMENT-CONVERSATION LINE, IN MY OWN WORDS

System 3 | The Compliance Workflow

Make it automatic — the repeatable protection loop.

Step	What happens
1 • Draft	Generate with anonymized inputs only — the Data Line applies before the first prompt.
2 • Review	The human gate: nothing AI-assisted publishes until a person has read every word.
3 • Verify	Run the fair-housing review prompt and check every fact against the listing sheet — AI invents details as confidently as it invents phrases.
4 • Document	Save the prompt, the AI draft, and the final published version together — one folder per listing.
5 • Disclose	Use your standard disclosure line where it applies — and follow your MLS and brokerage rules on AI-assisted content.

THE ONE NON-NEGOTIABLE

AI can draft; AI never publishes. The moment of risk is the gap between "generated" and "sent" — the human-review gate closes it.

The contrastive review prompt — show the AI what not to do

Models follow examples better than abstract rules. Put the banned patterns in the prompt itself, and make the model audit its own draft before handing it back.

Before you write anything: here are examples of language I must never use, because it describes people rather than property – "perfect for young families," "safe neighborhood," "walking distance to the church," "exclusive community." Never characterize who should live in the home, how safe an area is, its demographics, or its religious landmarks. Describe only verifiable features of the property and factual distances to general amenities. Now write the listing description from the details below – and after writing it, audit your own draft against the banned patterns and correct anything that slipped through.

Document, disclose, recover

The paper trail, the two disclosure lines, and what to do when something slips.

THE DOCUMENTATION HABIT

One folder (or one email thread) per listing: the prompt you used, the draft the AI returned, and the final version you published. If a question ever comes, you can show exactly what was generated, what you changed, and when. Under a minute per piece — and it ends arguments before they start.

Disclosure language

MARKETING DISCLOSURE

Portions of this description were drafted with AI assistance and reviewed by [Agent Name].

CLIENT-FACING DISCLOSURE

We use AI tools to help prepare marketing materials. Every AI-assisted piece is reviewed by our team before it is shared, and we never provide your personal or financial information to these tools.

Some MLSs and brokerages set their own AI-disclosure rules — check yours and follow the stricter standard.

When something slips — the recovery steps

Step	What to do
1 • Correct fast	Pull or fix the content everywhere it appears — MLS, portals, social, email queue, print queue.
2 • Document	Save what was published, where, and when — and what was corrected, and when.
3 • Loop in your broker	Same day. Your broker would far rather hear it from you than from a complaint.
4 • Fix the gate	Find where the loop broke — a skipped review, an un-anonymized input — and adjust your checklist so it can't repeat.

IF A COMPLAINT IS INVOLVED

A formal complaint or dispute is the moment for your broker and a qualified attorney — not for handling it alone.

Worksheet | My office AI rules

Write your rules, then bring this page to your broker — it's the starting draft of the office policy.

AI TOOLS WE USE, AND THE TIER EACH RUNS ON

TRAINING TOGGLE VERIFIED OFF ON EVERY CONSUMER ACCOUNT (ACCOUNT • DATE CHECKED)

OUR NEVER-SHARE LIST (BEYOND THE STANDARD SIX)

WHO IS THE HUMAN-REVIEW GATE FOR AI-ASSISTED CONTENT (NAME AND BACKUP)

WHERE WE SAVE THE PROMPT + DRAFT + FINAL FOR EACH PIECE

OUR DISCLOSURE LINE, WORD FOR WORD

WHEN SOMETHING SLIPS, THE FIRST CALL GOES TO

REVIEWED WITH BROKER ON (DATE • SIGNATURE)

Education, accuracy, and responsible use

The ground rule

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BEFORE RELYING ON A SETTING

AI products change their data controls and policies regularly. Open the tool, confirm the setting yourself, and re-check after major updates — treat every description of a settings menu, this guide's included, as a snapshot in time.

Responsible use

Check the language, the facts, and the data trail before anything AI-assisted leaves your hands.

HIGH-STAKES LIMIT

When a fair-housing complaint, a contract dispute, or a data question is live, the next call is your broker and a qualified attorney — not an AI chat.

CURRENCY CHECK

Fair-housing standards, MLS rules, and AI data policies all change. Verify the current requirements before relying on any checklist in this guide.

THE HABIT THAT CARRIES ALL THREE SYSTEMS

Review before you publish. Anonymize before you paste. Document as you go.