

1 STEPHANIE YONEKURA
 Acting United States Attorney
 2 LEON W. WEIDMAN
 Assistant United States Attorney
 3 Chief, Civil Division
 4 ROBYN-MARIE LYON MONTELEONE (Cal. Bar No. 130005)
 Assistant United States Attorney
 5 Civil Rights Unit Chief
 6 ERIKA JOHNSON-BROOKS (Cal. Bar No. 210908)
 7 GEOFFREY D. WILSON (Cal Bar No. 238577)
 Assistant United States Attorneys
 8 Federal Building, Suite 7516
 9 300 North Los Angeles Street
 Los Angeles, California 90012
 10 Telephone: (213) 894-0474 / 2420
 11 Facsimile: (213) 894-7819
 E-mail: Erika.Johnson@usdoj.gov
 12 Geoffrey.Wilson@usdoj.gov

13 Attorneys for Plaintiff

14
 15 UNITED STATES DISTRICT COURT
 16 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 17 WESTERN DIVISION

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 WESTMINSTER ASSET CORP.,
 22 WESTMINSTER ASSET, LLC,
 23 ROBERT ZINGRABE & LANCE
 24 GOLIA,

25 Defendants.

No. CV

COMPLAINT FOR VIOLATIONS OF
 THE FAIR HOUSING ACT PURSUANT
 TO 42 U.S.C. §§ 3612(o) AND 3614(a);
 DEMAND FOR JURY TRIAL FED. R.
 CIV. P. 38

1 Plaintiff, the United States of America, hereby complains and alleges as follows:

2 **NATURE OF ACTION**

3 1. This action is brought by the United States to enforce the provisions of
4 Title VIII of the Civil Rights Act of 1968 (the “Fair Housing Act”), as amended by the
5 Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601-36. It is brought pursuant to
6 42 U.S.C. § 3612(o) on behalf of Marinell and Thomas Cochran and the Fair Housing
7 Council of Orange County (“FHCOC”) and 42 U.S.C. § 3614(a).

8 **JURISDICTION AND VENUE**

9 2. This Court has jurisdiction of this action pursuant to 28 U.S.C. § 1331, 28
10 U.S.C. § 1345, 42 U.S.C. § 3612(o) and 42 U.S.C. § 3614(a).

11 3. Venue is proper in the Central District of California under 28 U.S.C. §
12 1391(b) and 42 U.S.C. § 3612(o), in that the events or omissions giving rise to this
13 action occurred in this district.

14 **AGGRIEVED PERSONS**

15 4. Marinell Cochran, a resident of Orange County, California, has been
16 diagnosed with a neurological mobility impairment and, due to her disability, uses a
17 “quad cane” (i.e., a cane with four ferrules) to move short distances and an electric
18 mobility scooter to move longer distances. Ms. Cochran is a person with a handicap, as
19 defined by 42 U.S.C. § 3602(h).

20 5. Thomas Cochran, a resident of Orange County, California, is Marinell
21 Cochran’s son.

22 6. The Fair Housing Council of Orange County (“FHCOC”) is a private non-
23 profit housing rights advocacy organization, with its headquarters in Santa Ana,
24 California.

25 **DEFENDANTS**

26 7. Westminster Asset Corp. is a corporate entity that owns, controls, and
27 operates a 312 unit apartment complex named the “Huntington Westminster Senior
28

1 Living Apartment Homes,” located at 13920 Hoover Street, Westminster, CA 92683
2 (hereinafter the “Subject Property”). The Subject Property in question is not exempt
3 under the Fair Housing Act and constitutes a dwelling within the meaning of 42 U.S.C. §
4 3602(b).

5 8. Westminster Asset, LLC. is a limited liability corporation and “single
6 purpose entity” that owns, controls, and operates the Subject Property. Westminster
7 Asset LLC is a wholly owned subsidiary of Westminster Asset Corp.

8 9. Robert Zinngrabe is a resident of Orange County. Mr. Zinngrabe was, at all
9 times relevant to the complaint, the President and sole member of Westminster Asset
10 Corp. and Westminster Asset, LLC (together the “Corporate Defendants”). Mr.
11 Zinngrabe is the individual who is responsible for establishing and enforcing the policies
12 and procedures of the corporate Defendants and is responsible for the day to day
13 operation of the Subject Property.

14 10. Lance Golia was, at all times relevant to the complaint, employed by the
15 corporate Defendants as a leasing agent at the Subject Property.

16 **FACTUAL ALLEGATIONS PERTAINING TO AGGRIEVED PARTIES**

17 **MARINELL AND THOMAS COCHRAN**

18 11. Plaintiff, United States of America, realleges and herein incorporates by
19 reference the allegations set forth in paragraphs 1 through 10 above.

20 12. Marinell Cochran is substantially limited in one or more major life
21 activities, including walking, and is a person with a handicap or disability as defined by
22 42 U.S.C. § 3602(h).

23 13. On or about January 5, 2012, Ms. Cochran visited the Subject Property with
24 the intent to rent an apartment.

25 14. Her son, Mr. Cochran, drove her to the Subject Property and accompanied
26 her throughout her visit to the Subject Property. Ms. Cochran’s son often assists Ms.
27 Cochran with transportation as she no longer drives a car.

28

1 15. The Subject Property advertises itself as an “Active Senior Lifestyle”
2 residence. Ms. Cochran wanted to live at the Subject Property because it was in good
3 condition, had many desirable amenities, was close to her son’s residence, and was
4 within her housing budget.

5 16. Ms. Cochran was shown a unit by Defendants’ managing leasing agent,
6 Lori Ruiz. While viewing a vacant unit, Ms. Cochran asked Ms. Ruiz if she could park
7 her electric mobility scooter on the balcony, and Ruiz told her that she could not. The
8 Cochrans observed that there was an alternate location within the apartment that could
9 adequately store Ms. Cochran’s mobility scooter. Ms. Ruiz then showed the Cochrans
10 the rest of the Subject Property and its amenities. Subsequently, Ms. Cochran told Ms.
11 Ruiz she wanted to rent the available one bedroom unit. Ms. Ruiz stated she would
12 inquire whether the apartment had been promised to anyone else and get back to Ms.
13 Cochran.

14 17. Several days after the Cochrans’ visit to the subject property, Ms. Ruiz
15 failed to contact Ms. Cochran as she had promised to do. Subsequently, Ms. Cochran
16 phoned Ms. Ruiz and expressed her continued desire to rent an apartment at the Subject
17 Property. Ms. Ruiz told Ms. Cochran that that they would not rent her a unit because she
18 used an electric mobility scooter. Ms. Cochran asked Ms. Ruiz to reconsider this denial.
19 Ms. Ruiz said she would again ask management of the Subject Property for approval.

20 18. After several days passed without hearing from Ms. Ruiz, Ms. Cochran
21 called Ms. Ruiz again to express her continued desire to rent an apartment at the Subject
22 Property and inquired whether they had changed their mind about allowing her to rent a
23 unit. Ms. Ruiz again told Ms. Cochran that she was not eligible to rent an apartment
24 because she used an electric mobility scooter. Ms. Ruiz stated to Ms. Cochran that she
25 had asked, but that “they would not let” Ms. Ruiz rent an apartment to Ms. Cochran
26 because she used a mobility scooter.

27 19. The “they” Ms. Ruiz referred to was Defendant Zinngrabe and/or corporate
28

1 Defendants, acting through their policies, agents and employees, on behalf of
2 Defendants.

3 20. At all relevant times, Ms. Ruiz was an employee of Defendants and acting
4 pursuant to Defendants' policies and procedures and in furtherance of Defendants'
5 business in her interactions with Ms. Cochran.

6 21. Ms. Cochran shared Defendants' communications to her with her son, Mr.
7 Cochran. Mr. Cochran observed that Ms. Cochran was emotionally devastated by the
8 Defendants' refusal to rent her an apartment because of her disability. His observations
9 also caused Mr. Cochran significant emotional distress.

10 22. At all relevant times, there was an apartment available to rent at the Subject
11 Property that met Ms. Cochran's needs and that Ms. Cochran was fully qualified to rent.

12 23. Over the next few months, Mr. Cochran assisted his mother in locating
13 other housing. But for Defendants' discriminatory refusal to rent Ms. Cochran an
14 apartment, Mr. Cochran would not have been required to do so.

15 **FACTUAL ALLEGATIONS PERTAINING TO AGGRIEVED PARTY FHCOC**

16 24. Plaintiff, United States of America, realleges and herein incorporates by
17 reference the allegations set forth in paragraphs 1 through 23 above.

18 25. FHCOC is a non-profit organization that has a mission to ensure fair
19 housing by providing a variety of services directed towards education and enforcement
20 of fair housing laws. FHCOC's mandate is to protect the quality of life in Orange
21 County by ensuring equal access to housing opportunities, fostering diversity and
22 preserving dignity and human rights.

23 26. On January 25, 2012, based on Defendants' herein above described
24 conduct, Ms. Cochran contacted the FHCOC.

25 27. One of FHCOC's activities is to perform fair housing testing investigations
26 at rental properties. Fair housing testing consists of individuals posing as prospective
27 home seekers (i.e., testers) simulating housing transactions with a housing provider.
28

1 Responses from the housing provider to the testers are compared for differences. An
2 inference of discrimination can be made when there is a substantial difference in the
3 treatment of the testers by the housing provider when the only material difference
4 between the testers is a protected basis (e.g., disability). A “Protected Tester” is one who
5 exhibits the protected characteristic being tested. A “Control Tester” lacks the protected
6 characteristic.

7 28. On June 15, 2012, FHCOOC performed a fair housing rental test on the basis
8 of disability at the Subject Property.

9 29. The Protected Tester, a non-Hispanic white female, arrived at the subject
10 property on June 15, 2012, at 9:30 a.m. She met leasing agent Lance Golia. The
11 Protected Tester told Golia that she was looking for a two bedroom apartment for her
12 mother to rent. Golia asked the Protected Tester questions about her mother, including
13 about her mother’s health. The Protected Tester told Golia that her mother had COPD
14 (chronic obstructive pulmonary disease) and heart problems. He asked her whether her
15 mother was okay taking medications and if she was able to move around on her own.
16 The Protected Tester told Golia that her mother used a “Hoveround” (brand) scooter to
17 get around when she went to the mall, Disneyland, and long distances. Golia asked the
18 Protected Tester how old her mother was, and the Protected Tester told him that her
19 mother was 73 years old. Golia asked the Protected Tester whether she and her mother
20 had a floor preference, whereupon the Protected Tester said they did not.

21 30. Mr. Golia asked the Protected Tester what her mother’s price range was and
22 she replied by telling him \$1,300 to \$1,500. A rent price sheet for the Subject Property
23 given to the Protected Tester during her site visit states that the one-bedroom unit rented
24 for \$1,125 to \$1,225 and a two-bedroom unit rented for \$1,365 to \$1,495. The Protected
25 Tester also told Golia that her mother’s income was \$4,200 a month from pensions and
26 SSI and that her mother was retired.

27 31. Mr. Golia said that he “may” have a two bedroom unit available on the
28

1 fourth floor. However, before he could show the Protected Tester the unit, the Protected
2 Tester needed to fill out a guest profile form. Golia told her that there was a waiting list
3 for units in the complex and there were three people on the list awaiting a unit. Golia
4 showed her a waiting list. Golia told the Protected Tester that he had more available one
5 bedroom units than two bedroom units. The Protected Tester completed the guest profile
6 form by writing her mother's name on the form with the Protected Tester's own address,
7 phone number, and email address. After completing the form, the Protected Tester gave
8 it to Golia.

9 32. Golia showed the Protected Tester unit 119, which was a model two
10 bedroom, one bathroom unit. The model unit was fully furnished, and Golia told the
11 Protected Tester that tenants were required to provide their own furniture and
12 refrigerator. The Protected Tester viewed the rooms in unit 119. Then Golia showed the
13 Protected Tester unit 115, which was a model one bedroom unit.

14 33. After viewing the two units, the Protected Tester asked Golia whether
15 utilities were included in the rent, whereupon he responded that the only expenses the
16 tenant had to pay were electricity and a telephone line. Golia told the Protected Tester
17 that Westminster Senior Apartments was not like an assisted living facility and that he
18 had previously worked at an assisted living facility. They returned to the office where
19 Golia gave her a rental application, application instructions, an authorization form to
20 release information, Dish Network sheet, June 2012 menu, price sheet, several pages of
21 information describing the units and complex and a June 2012 newsletter.

22 34. The Protected Tester left the subject property at 10:02 a.m. During the time
23 that the Protected Tester interacted with Golia, he never mentioned any move in specials
24 or lease terms (such as month-to-month or annual). Golia never offered to show the
25 Protected Tester any units that were available for rent. The Protected Tester was never
26 contacted by Golia or any of the Defendants' staff after the site visit.

27 35. The Control Tester, a non-Hispanic white female, arrived at the subject
28

1 property on June 15, 2012, at 10:22 a.m. She met Golia and told him that she was
2 looking for a two bedroom apartment for her mother "ASAP." Golia asked her how old
3 her mother was and she replied 68.

4 36. Golia asked the Control Tester to follow him to his office, which she did.
5 Golia handed the Control Tester a form to fill out. The Control Tester wrote her name,
6 address, phone number, email address, and her mother's name on the form. Golia asked
7 the Control Tester what price range her mother was interested in, and she said
8 somewhere between \$1,300 and \$1,500 a month. Golia said he had a two bedroom, one
9 bathroom unit that was immediately available at \$1,365 a month with a \$700 deposit.
10 He also said he had a one bedroom, one bathroom unit available for \$1,290 a month with
11 a \$600 deposit. Golia told the Control Tester that he could show her the model units as
12 well as the units that were immediately available for rent. Golia and the Control Tester
13 left the rental office.

14 37. Golia and the Control Tester viewed unit 115, a two bedroom unit. While
15 in the unit Golia told the Control Tester that all utilities other than electricity were paid
16 for by management. Then they viewed unit 119, a one bedroom unit. After viewing unit
17 119 they viewed unit 402, a two bedroom unit. Golia said unit 402 was available for
18 \$1,365 a month. He said that all (available) units could be rented either with a one year
19 lease, which included free rent for the first month, or month to month. Golia said all
20 units had central air and heat. The fourth and last unit that the Control Tester and Golia
21 viewed was unit 113, a one bedroom unit.

22 38. Unit 113 was vacant. Golia said this unit was available for \$1,290 a month
23 and did not have a refrigerator. Golia asked the Control Tester which unit she thought
24 her mother would want to rent. She replied that she would have to return to the subject
25 property with her mother to look at the units. Golia asked her when she would be able to
26 return with mother. The Control Tester told Golia that her mother was at work at the
27 moment but she would talk to her. Golia asked her where her mother worked. The
28

1 Control Tester told Golia that her mother was currently working part time at a store in
2 Garden Grove called “Anna’s Linens.” Golia said he was looking forward to meeting
3 her. Golia mentioned that a parking space would cost \$25 monthly if her mother wanted
4 one.

5 39. Golia and the Control Tester returned to the rental office. Golia handed the
6 Control Tester the same application package that was given to the Protected Tester.
7 Golia said there was a credit check fee of \$30. He told her that the minimum monthly
8 income to qualify was \$2,050 for the two bedroom unit and \$1,750 for the one bedroom
9 unit. Golia said that in order for management to hold an available unit for someone, one
10 half of the deposit amount would be required. The Control Tester told Golia that her
11 mother’s monthly income from her part time job, SSI, and a pension was \$3,800. Golia
12 told her that her mother would have to provide proof of income as well as bank
13 statements, SSI deposits, check stubs, tax returns, etc. The Control Tester told Golia that
14 when her mother left work she would talk to her and then she would contact Golia.

15 40. The Control Tester never stated or suggested that her mother had a
16 disability or condition that required the use of a mobility device. The Control Tester left
17 the subject property at 10:50 a.m. Neither Golia nor any other staff person at the subject
18 property told the Control Tester about a waiting list.

19 41. On or around June 20, 2012, the Control Tester received a card from Golia.
20 The card had been mailed to the Control Tester and contained the following hand written
21 message: “Hello [name], It was very nice to meet you the other day. Just let me know if
22 you’d like to schedule a tour for you and your mother? I’ll look forward to talking with
23 you again soon. Sincerely, Lance Golia.” The card was mailed with Golia’s business
24 card and another hand written note that states: “have a wonderful day!”

25 42. The Protected Tester never received a card or any type of follow up
26 communication from the Defendants.

27 43. As alleged herein above, during the FHCOOC testing, Defendants made a
28

1 representation “to a person because of disability,” 42 U.S.C. 3604(d), that a dwelling
2 was not available for inspection or rental when such dwelling was in fact available.

3 44. The Defendants’ discriminatory housing practices frustrated FHCOOC’s
4 mission by denying Ms. Cochran, and other persons, equal access to their apartments
5 because of their disabilities.

6 45. The investigation itself constitutes an economic loss to FHCOOC due to
7 diversion of its resources. The diversion of its resources and Defendants’ discriminatory
8 housing practices have frustrated FHCOOC’s mission to ensure equal housing opportunity
9 for Orange County residents.

10 **UNITED STATES DEPARTMENT OF HOUSING AND URBAN**
11 **DEVELOPMENT (“HUD”) DETERMINES THAT THERE IS REASONABLE**
12 **CAUSE TO BELIEVE THAT THE DEFENDANTS DISCRIMINATED AGAINST**
13 **THE AGGRIEVED PARTIES IN VIOLATION OF THE FAIR HOUSING ACT**
14 **AND ISSUES A CHARGE OF DISCRIMINATION**

15 46. Plaintiff, United States of America, realleges and herein incorporates by
16 reference the allegations set forth in paragraphs 1 through 45 above.

17 47. On December 6, 2012, Marinell Cochran timely filed a complaint with
18 HUD alleging that Defendants had discriminated against her based on disability.

19 48. On December 18, 2012, FHCOOC timely filed a complaint with HUD
20 alleging that Defendants had discriminated against it based on disability.

21 49. Pursuant to the requirements of 42 U.S.C. §§ 3610(a) and (b), the Secretary
22 of HUD conducted an investigation of the complaints, attempted conciliation without
23 success, and prepared a final investigative report. Based on the information gathered in
24 this investigation, the Secretary, pursuant to 42 U.S.C. § 3610(g)(1), determined that
25 reasonable cause existed to believe that Defendants had committed illegal discriminatory
26 housing practices in connection with the Subject Property. Therefore, on September 30,
27 2014, the Secretary issued a Determination of Reasonable Cause and Charge of
28

1 Discrimination, pursuant to 42 U.S.C. § 3610(g)(2)(A), charging that the Defendants had
2 engaged in discriminatory practices, in violation of the Fair Housing Act.

3 50. On or about October 7, 2014, Westminster Asset Corp., Westminster Asset,
4 LLC, Robert Zinngrabe, and Lance Golia, made a timely election to have the claims
5 asserted in the charge decided in a civil action pursuant to 42 U.S.C. § 3612(a).

6 51. On October 8, 2014, the HUD Office of Hearings and Appeals Acting Chief
7 Administrative Law Judge, J. Jeremiah Mahoney, issued Notices of Election to Proceed
8 in United States District Court and terminated the proceedings on Ms. Cochran and
9 FHCOC's complaints.

10 52. Following these Notices of Election, the Secretary of HUD authorized the
11 Attorney General to commence a civil action pursuant to 42 U.S.C. § 3612(o).

12
13 **FIRST CLAIM FOR RELIEF**

14 53. Plaintiff, United States of America, realleges and herein incorporates by
15 reference the allegations set forth in paragraphs 1 through 52 above.

16 54. By the actions and statements referred to in the foregoing paragraphs,
17 Defendants Westminster Asset Corp., Westminster Asset, LLC and Robert Zinngrabe:

18 a. Discriminated in the rental of a dwelling or otherwise made housing
19 unavailable to Ms. Cochran because of a disability in violation of 42 U.S.C. §
20 3604(f)(1)(A);

21 b. Discriminated against Ms. Cochran in the terms, conditions, or
22 privileges of a rental of a dwelling, or in the provision of services or facilities in
23 connection with such a dwelling, because of a disability in violation of 42 U.S. C.
24 § 3604(f)(2)(A); and

25 c. Made, printed, or published one or more notices or statements to Ms.
26 Cochran and Mr. Cochran with respect to the rental of a dwelling that indicate a
27 preference, limitation, or discrimination based on disability in violation of 42
28

1 U.S.C. § 3604(c).

2 55. By the actions in the foregoing paragraphs, each Defendant:

3 a. Violated 42 U.S.C. § 3604(d) when Defendant Golia, as agent for the
4 corporate Defendants and Defendant Zinngrabe, told the Protected Tester that
5 certain or all units of the Subject Property were unavailable based on disability;
6 and

7 b. Violated 42 U.S.C. § 3604(f)(2) when Defendant Golia, as agent for the
8 corporate Defendants and Defendant Zinngrabe, offered tenancy in vacant units to
9 the Control Tester, but advised the Protected Tester that there was a waiting list,
10 offered lease options to the Control Tester while not offering any lease options to
11 the Protected Tester, and made inquiries into the nature and severity of the
12 disability of the prospective tenant when speaking with the Protected Tester.

13 56. Ms. Cochran, Mr. Cochran, and the FHCOC are “aggrieved persons” within
14 the meaning of 42 U.S.C. § 3602(i).

15 57. As the result of the Defendants Westminster Asset Corp., Westminster
16 Asset, LLC and Robert Zinngrabe’s discriminatory conduct, Ms. Cochran and Mr.
17 Cochran have suffered and continue to suffer damages.

18 58. As the result of each Defendant’s discriminatory conduct, FHCOC has
19 suffered damages, including economic loss due to diversion of its resources and
20 frustration of its mission to educate and perform outreach to the residents and property
21 owners of Orange County and to ensure equal housing opportunities for Orange County
22 residents.

23 59. The discriminatory actions of the Defendants were intentional, willful, and
24 taken in disregard of the federally protected rights of Ms. Cochran, Mr. Cochran, and the
25 FHCOC.

26 **SECOND CLAIM FOR RELIEF**

27 60. Plaintiff, United States of America, realleges and herein incorporates by
28

1 reference the allegations set forth in paragraphs 1 through 59 above.

2 61. Defendants' conduct, as described above, constitutes:

3 a. A pattern or practice of resistance to the full enjoyment of rights granted
4 by the Fair Housing Act, 42 U.S.C. §§ 3601-3619; and/or

5 b. A denial to a group of persons rights granted by the Fair Housing Act, 42
6 U.S.C. §§ 3601-3619, which denial raises an issue of general public importance.

7 62. There may be persons in addition to Ms. Cochran, Mr. Cochran and the
8 FHCOC who have been injured by, and may have suffered damages as a result of, the
9 Defendants' conduct. All of these persons are "aggrieved persons" within the meaning
10 of 42 U.S.C. § 3602(i).

11 63. The discriminatory actions of the Defendants were intentional, willful, and
12 taken in disregard of the federally protected rights of others.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, the United States prays that the Court:

15 1. Declare that the Defendants' discriminatory conduct as alleged herein
16 violates the Fair Housing Act, 42 U.S.C. §§ 3601-3619;

17 2. Enjoin the Defendants, their agents, employees, successors, and all other
18 persons in active concert or participation with any of them from discriminating because
19 of a disability in violation of the Fair Housing Act, 42 U.S.C. §§ 3601-3619;

20 3. Order Defendants to take such affirmative steps as may be necessary to
21 restore, as nearly as practicable, Ms. Cochran, Mr. Cochran, the FHCOC and all other
22 aggrieved persons to the positions they would have been in but for the discriminatory
23 conduct;

24 4. Order Defendants to take such actions as may be necessary to prevent the
25 recurrence of any discriminatory conduct in the future and to eliminate, to the extent
26 practicable, the effects of their unlawful conduct, including implementing policies and
27 procedures to ensure that no applicants or residents are discriminated against because of
28

1 disability;

2 5. Award monetary damages to Ms. Cochran, Mr. Cochran, and the FHCOC,
3 pursuant to 42 U.S.C. §§ 3612(o)(3) and 3613(c)(1);

4 6. Award monetary damages to all other persons harmed by the Defendants'
5 discriminatory practices for injuries caused by the Defendants' discriminatory conduct
6 pursuant to 42 U.S.C. § 3614(d)(1)(B); and

7 7. Assess a civil penalty against the Defendants in order to vindicate the public
8 interest pursuant to 42 U.S .C. § 3614(d)(1)(C).

9 ///

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 The United States further prays for such other and further relief the interests of
2 justice may require and demands a trial by jury pursuant to Fed. R. Civ. P. 38.

3 Dated: November 6, 2014

Respectfully submitted,

4
5 ERIC H. HOLDER, JR.
Attorney General of the United States
6

7 /s/ Vanita Gupta

8 VANITA GUPTA
9 Acting Assistant Attorney General
Civil Rights Division
10

STEPHANIE YONEKURA
Acting United States Attorney
LEON W. WEIDMAN
Assistant United States Attorney
Chief, Civil Division
ROBYN-MARIE LYON MONTELEONE
Assistant United States Attorney
Civil Rights Unit Chief

11 /s/ Steven H. Rosenbaum

12 STEVEN H. ROSENBAUM
13 Chief
14 ELIZABETH A. SINGER
Director, U.S. Attorney's Fair
15 Housing Program
Housing & Civil Enforcement Section
16 Civil Rights Division
U.S. Department of Justice
17 950 Penn. Ave., NW – NWB
18 Washington, D.C. 20530
19 E-Mail: Elizabeth.Singer@usdoj.gov
20 Phone: (202) 514-6164

/s/ Erika Johnson-Brooks

ERIKA JOHNSON-BROOKS
GEOFFREY D. WILSON
Assistant United States Attorneys

21 Attorneys for Plaintiff
22
23
24
25
26
27
28