

The Defendants

7. CVP I, LLC, a Delaware limited liability company, Downtown Manhattan Residential LLC, a Delaware limited liability company, Chrystie Venture Partners, LLC, a Delaware limited liability company, and Avalon Bay Communities, Inc., a Maryland corporation, are the owners, and/or builders and developers of Avalon Chrystie Place, and, in those capacities, designed and constructed the complex.

8. SLCE Architects LLP is a New York limited liability partnership that drew the architectural plans for Avalon Chrystie Place and, in that capacity, designed and constructed the complex.

Other Properties

9. Upon information and belief, the Defendants have designed and constructed other multifamily housing complexes for first occupancy after March 13, 1991, which are also subject to the Fair Housing Act's accessibility requirements.

Fair Housing Act Claims

10. Plaintiff re-alleges and incorporates by reference the allegations set forth in paragraphs 1-9 above.

11. Defendants violated 42 U.S.C. § 3604(f)(3)(C) and 24 C.F.R. § 100.205(c) by failing to design and construct Avalon Chrystie Place in such a manner that:

- a. the public use and common use portions of the dwellings are readily accessible to and usable by persons with disabilities; and
- b. all premises within such dwellings contain the following features of adaptive design:

