

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA, )  
                              )  
Plaintiff,                )  
                              )  
v.                         )  
                              )  
REGENT COURT APARTMENTS LLC )  
and DONNA HARRISON,        )  
                              )  
Defendants.                )  
\_\_\_\_\_  
                              )

**COMPLAINT**

The United States of America alleges:

1. This action is brought by the United States to enforce the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, ("Fair Housing Act"), 42 U.S.C. §§ 3601 et seq.
2. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1345 and 42 U.S.C. § 3614(a).
3. Venue is proper under 28 U.S.C. § 1391(b). The claims asserted herein arose in the Eastern District of Michigan and concern or otherwise relate to real property located in the Eastern District of Michigan.
4. Defendant Regent Court Apartments LLC is a domestic limited liability corporation formed in 2003 pursuant to Michigan law with a registered office address in Southfield, Michigan. Defendant Regent Court Apartments LLC owns and operates the Regent Court Apartments located at 18830 East 14 Mile Road in Roseville, Michigan.

5. Defendant Donna Harrison resides in the Eastern District of Michigan. At all times relevant to this action, she has been the property manager at the Regent Court Apartments.

6. The Regent Court Apartments are dwellings within the meaning of the Fair Housing Act, 42 U.S.C. § 3602(b).

7. The United States Department of Justice conducted a series of tests in 2007 at the Regent Court Apartments to evaluate the Defendants' compliance with the Fair Housing Act. The testing undertaken by the United States revealed that the Defendants are engaging in housing practices that discriminate on the basis of race or color, including:

- a. Denying the availability of apartments for rent or inspection to African-American persons while at the same time telling white persons about apartments available to rent or inspect; and
- b. Failing to provide African-American persons information about the availability of apartments to rent or inspect that is full, complete, and consistent with the information provided to white persons.

8. The conduct of the Defendants described above constitutes:

- a. A refusal to negotiate for the rental of, or otherwise make unavailable or deny dwellings to persons because of race or color, in violation of 42 U.S.C. § 3604(a);

b. Discrimination against persons in the terms, conditions or privileges of rental, or in the provision of services in connection therewith, because of race or color, in violation of 42 U.S.C. § 3604(b); and

c. A representation to persons because of race or color that dwellings are not available for inspection or rental when such dwellings are in fact so available, in violation of 42 U.S.C. § 3604(d).

9. The conduct of the Defendants described above constitutes:

a. A pattern or practice of resistance to the full enjoyment of rights granted by the Fair Housing Act, 42 U.S.C. §§ 3601 et seq.; and

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

10. There may be persons who have been the victims of discriminatory housing practices engaged in by the Defendants. Such persons are aggrieved persons as defined in 42 U.S.C. § 3602(i), and may have suffered injuries as a result of the Defendants' conduct described above.

11. The Defendant's conduct described above was intentional, willful, and taken in disregard of the rights of others.

WHEREFORE, the United States prays that the Court enter an order that:

1. Declares that the Defendants' policies and practices, as alleged herein, violate the Fair Housing Act;
2. Enjoins the Defendants, their officers, employees, agents, successors, and all other persons in active concert or participation with them, from:
  - a. discriminating against any person on the basis of race or color in any aspect of the rental of a dwelling;
  - b. failing or refusing to notify the public that dwellings owned or operated by the Defendants are available to all persons on a nondiscriminatory basis; and
  - C. Failing or refusing to take such affirmative steps as may be necessary to restore, as nearly as practicable, the victims of the Defendants' unlawful practices to the position they would have been in but for the discriminatory conduct;
3. Awards monetary damages to all persons aggrieved by the Defendants' discriminatory practices, pursuant to 42 U.S.C. § 3614(d)(1)(B); and

4. Assesses a civil penalty against the Defendants in the amount authorized by 42 U.S.C. § 3614(d)(1)(C) to vindicate the public interest.

The United States further prays for such additional relief as the interests of justice may require.

MICHAEL B. MUKASEY  
Attorney General

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STEPHEN MURPHY, III  
United States Attorney

GRACE CHUNG BECKER  
Acting Assistant Attorney  
General  
Civil Rights Division

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Judith E. Levy  
Assistant U.S. Attorney  
211 West Fort Street, Ste. 2001  
Detroit, Michigan 48226  
(313) 226-9727  
[judith.levy@usdoj.gov](mailto:judith.levy@usdoj.gov)

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STEVEN H. ROSENBAUM  
Chief, Housing and Civil  
Enforcement Section  
Civil Rights Division

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TIMOTHY J. MORAN  
Deputy Chief  
BURTIS M. DOUGHERTY  
Attorney  
Housing and Civil Enforcement  
Section  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Northwestern Building  
Washington, D.C. 20530  
Phone: (202) 514-4737  
Fax: (202) 514-1116  
[Burtis.m.dougherty@usdoj.gov](mailto:Burtis.m.dougherty@usdoj.gov)