

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

UNITED STATES OF AMERICA,)	
)	
)	
Plaintiff,)	
)	
)	
v.)	Civil Action No.
)	
)	
JULIE SOKOLOFF)	
and STEVEN SOKOLOFF,)	
)	
)	
Defendants.)	
_____)	

COMPLAINT

The United States of America alleges:

1. This action is brought by the United States on behalf of Adam Robinson and Marta White, pursuant to subsection 812(o) of the Fair Housing Act (“Act”), 42 U.S.C. § 3612(o).

2. This Court has jurisdiction over this action under 28 U.S.C. § 1345 and 42 U.S.C. § 3612(o).

3. Venue is proper in that the claims alleged herein arose in the Eastern District of Pennsylvania.

4. Adam Robertson and Marta White (“Complainants”) were, at all times material to this Complaint, in the process of adopting a son under the age of 18.

5. At all times relevant, Defendants Steven and Julie Sokoloff were the owners and managers of a three-unit rental building located at 507 Woodland Terrace, Philadelphia, Pennsylvania 19104-4511. The apartments in this building are dwellings within the meaning of

42 U.S.C. § 3602(d). Defendants also own and manage other, similar rental properties in the Woodland Terrace area.

6. Between February and August of 2006, Complainants resided in Lusaka, Zambia. Complainants were planning to move to Philadelphia in the Fall of 2007 to resume their studies as medical students at the University of Pennsylvania. In May of 2007, Complainants were searching for suitable housing near the University for themselves and their son. Friends who resided in an apartment owned by Defendants told them that Defendants might have a suitable apartment available in the Fall.

7. On or about May 29, 2006, Complainant Marta White sent a message by electronic mail to defendant Julie Sokoloff asking whether Defendants expected to have a two- or three-bedroom apartment available in the Fall. Ms. Sokoloff replied by electronic mail on the same date to the effect that a two-bedroom apartment, designated "Apartment 3," at 507 Woodland Terrace would be available for rent on September 1, 2006. Ms. White responded on the same date, expressing an interest in that apartment and asking whether friends of Complainants could inspect the apartment for them.

8. On or about May 30, 2006, Julie Sokoloff sent a further electronic mail to Marta White agreeing to make the apartment available for inspection by Complainants' friends. In replying, Ms White disclosed the fact that she and Mr. Robinson were in the process of adopting a son. Ms. Sokoloff replied by an electronic mail which stated, "Sorry, we do not rent to anyone with children – this apartment is really not big enough for a family. Best of luck – sorry we can't be more helpful."

9. In a further electronic mail, Complainant Marta White asked Defendant Julie Sokoloff

to reconsider and asked whether the law did not prohibit discrimination against families with children. Ms. Sokoloff sent a reply on or about May 31, 2006, in which she said that Defendants did not prohibit families with children from renting Apartment 3 at 507 Woodland Terrace. However, she expressed the opinion that the apartment was not suitable for children because of the probable presence of lead paint and because there was no storage space for strollers and other accessories for children.

10. Defendants subsequently rented Apartment 3 at 507 Woodland Terrace to a woman without children. Complainants rented an apartment, which was less convenient for them than Apartment 3 at 507 Woodland Terrace, for which they pay a higher rent.

11. On or about February 7, 2007, Marta White and Adam Robertson filed a timely complaint with the United States Department of Housing and Urban Development ("HUD") pursuant to subsection 810(a) of the Act, 42 U.S.C. § 3610(a). The complaint alleged that defendants Julie Sokoloff and Steve Sokoloff discriminated against them on the basis of familial status, in violation of 42 U.S.C. § 3604.

12. Pursuant to the requirements of 42 U.S.C. § 3610(a) and (b), the Secretary of HUD conducted and completed an investigation of the complaint, attempted conciliation without success, and prepared a final investigative report. Based on the information gathered in the investigation, the Secretary, pursuant to 42 U.S.C. § 3610(g)(1), determined that reasonable cause exists to believe that discriminatory housing practices had occurred. Accordingly, on June 19, 2007, the Secretary issued a Charge of Discrimination ("Charge") pursuant to 42 U.S.C. § 3610(g)(2)(A), charging Defendants with engaging in discriminatory housing practices in violation of the Act.

13. On or about July 16, 2007, Julie Sokoloff and Steve Sokoloff elected to have the Charge resolved in a civil action in federal district court, pursuant to 42 U.S.C. § 3612(a).

14. Following the election described in the preceding paragraph, on July 16, 2007, the Secretary of HUD authorized the Attorney General to commence a civil action, pursuant to 42 U.S.C. § 3612(o).

15. Defendants, through the actions referred to in paragraphs 7 - 9, above, have:

(a) discriminated in the rental of a dwelling or otherwise made unavailable or denied a dwelling to Complainants and their son because of their familial status, in violation of 42 U.S.C. § 3604(a); and

(b) made or caused to be made a statement with respect to the rental of a dwelling that indicates a preference, limitation, or discrimination, or an intent to make such a preference, limitation or discrimination, based on familial status, in violation of 42 U.S.C. § 3604(c).

16. Marta White and Adam Robinson are each an aggrieved person, as defined in 42 U.S.C. § 3602(i), and have suffered damages as a result of defendants' conduct described above.

17. Defendants' discriminatory actions were intentional, willful, and taken in disregard for the rights of complainants Marta White and Adam Robinson.

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

1. Declares that defendants' discriminatory housing practices, as set forth above, violate the Act, 42 U.S.C. §§ 3601-19;

2. Enjoins defendants, their agents, employees, and successors, and all other persons in active concert or participation with them from discriminating on the basis of familial status

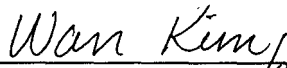
against any person in any aspect of the rental of a dwelling; and

3. Awards monetary damages to complainants Marta White and Adam Robinson pursuant to 42 U.S.C. §§ 3612(o)(3) and 3613(c)(1).

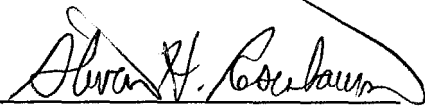
The United States further prays for such additional relief as the interests of justice may require.

ALBERTO R. GONZALES
Attorney General

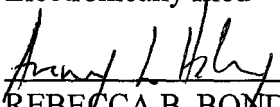
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~~Electronically filed~~ ⁴

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