UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. HOUSING AUTHORITY OF THE CITY OF BLOOMFIELD, MISSOURI and EDDIE JOE HANKINS, Defendants.	Case No.: 1:25-cv-00160 JURY TRIAL DEMANDED

COMPLAINT AND DEMAND FOR JURY TRIAL

The United States of America alleges as follows:

1. The United States brings this action to enforce the provisions of Title VIII of the Civil Rights Act of 1968, as amended, 42 U.S.C. §§ 3601, *et seq.* (the "Fair Housing Act" or "FHA").

2. The United States brings this action under 42 U.S.C. § 3612(o) on behalf of Brandi M. Forister ("Ms. Forister") and her minor children.

JURISDICTION AND VENUE

3. This Court has subject-matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1345, and 42 U.S.C. § 3612(o)(1).

4. Venue is proper in this District under 28 U.S.C. § 1391(b) because the actions and omissions giving rise to the United States' claims occurred in the Eastern District of Missouri, and Defendant Housing Authority of the City of Bloomfield, Missouri, does business in the Eastern District of Missouri.

5. Divisional venue is proper in the Southeastern Division pursuant to this Court's Local Rule 2.07(A)(3).

THE PARTIES

6. Defendant Housing Authority of the City of Bloomfield, Missouri ("BHA") is a non-profit organization created pursuant to the laws of the State of Missouri and has its principal place of business located at 476 Hester Street, Bloomfield, Missouri 63825, which is located in the Eastern District of Missouri.

7. At all times relevant to this action, Defendant Eddie Joe Hankins was a resident of Missouri.

8. At all times relevant to this action, Defendant Hankins worked for Defendant BHA as the Executive Director of BHA. In that role, Defendant Hankins was BHA's agent, with actual or apparent authority to manage all aspects of BHA's housing program.

FACTUAL ALLEGATIONS

9. Defendant BHA owns and operates a public housing property consisting of 46 dwelling units (the "subject property").

10. Defendant Hankins was employed as the Executive Director of Defendant BHA from 2019 until he resigned on April 4, 2022.

11. As Executive Director, Defendant Hankins' duties included reviewing applications for BHA housing, including for the subject property, determining eligibility for housing, approving or denying applications, placing applicants on the waiting list, and handling grievances and conducting informal hearings.

12. Defendants are involved in the rental of and provision of assistance for "dwellings" as defined by the Fair Housing Act (FHA). 42 U.S.C. § 3602(b).

13. At all times relevant to this action, Defendant BHA provided Defendant Hankins, in his capacity as Executive Director, with the actual or apparent authority to, among other things, review applications for BHA housing, determine eligibility for housing, approve or deny

applications, place applicants on the waiting list, and conduct informal hearings on housing eligibility.

14. Ms. Forister, at the time of the alleged discrimination, lived with her three children, two of whom were minors, in Bloomfield, Missouri.

15. On October 27, 2021, Ms. Forister applied to Defendant BHA for public housing at the subject property for her and her three children.

16. In a letter dated October 27, 2021, signed by Defendant Hankins, Defendants notified Ms. Forister that she was ineligible to receive federal housing assistance at BHA.

17. In that same letter, Defendants informed Ms. Forister that she could request an informal hearing by presenting a grievance of the determination to the Executive Director within five days. Defendants also told Ms. Forister that she should contact Defendant Hankins if she had any questions about the determination or the informal hearing process.

18. On October 29, 2021, Ms. Forister went to Defendant BHA's office to discuss the October 27, 2021 determination letter with Defendant Hankins.

19. Defendant Hankins brought Ms. Forister into his office and closed the door.

20. Ms. Forister explained to Defendant Hankins that she wanted to discuss the determination letter because she and her children needed a home. Defendant Hankins asked Ms. Forister to come behind his desk to pray with him about her application and put out his hands for her to hold while they prayed. As they began to pray, Defendant Hankins leaned his head into Ms. Forister's breasts. He then pulled Ms. Forister down onto his lap, touched her breast with his hand, and tried to kiss her.

21. Trying to direct Defendant Hankins back to her request for housing, Ms. Forister asked Defendant Hankins if he would accept her application and put her on the waiting list. He responded that he would "look at it," and then acknowledged, "I am probably going over the line

here," but "I think you are beautiful."

22. Defendant Hankins promised that he would "take care of" Ms. Forister if she "let the system work." He told her, "I'm trying to get you in here, okay . . . . If you don't want to work with it, that's fine." Ms. Forister understood this to mean that if she engaged in sexual activity with Defendant Hankins, he would place her on the housing waiting list and/or put her into a unit once it became available.

23. Through the conduct described above, Defendant Hankins subjected Ms. Forister to discrimination on the basis of sex, including unwelcome sexual harassment that was severe or pervasive, including unwelcome sexual touching, sexual comments, sexual advances, and an offer of tangible housing benefits in exchange for sex.

24. Almost immediately after leaving Defendant Hankins' office, Ms. Forister filed a police report with the Bloomfield Police Department and Defendant Hankins eventually pleaded guilty to Felony E harassment in the First Degree.

25. On November 2, 2021, Ms. Forister submitted a request with Defendant BHA for a formal hearing to appeal the denial of her housing application. In her letter request, she stated that she viewed a formal hearing, rather than an informal hearing with Defendant Hankins, as "appropriate" given the "highly inappropriate criminal behavior (sexual exploitation of [her] need for federal housing assistance)" that occurred during her prior attempt to discuss the matter with Defendant Hankins.

26. On December 6, 2021, Defendant Hankins sent Ms. Forister a letter asking her to contact the office to set a date for an informal hearing. The letter stated that she was not entitled to a formal hearing because she was not a current resident.

27. Defendant Hankins had sole authority to determine whether Ms. Forister's informal appeal would be successful and whether it would result in her being placed on the housing waitlist.

After she rejected his sexual advances, Defendant Hankins never placed her on the waiting list, and she was denied housing by Defendant BHA.

28. Defendant Hankins' actions were unsolicited and unwelcomed by Ms. Forister.

29. The above-described actions and conduct of Defendants caused Ms. Forister to suffer economic harm, physical harm, fear, anxiety, and emotional distress.

30. The discriminatory conduct described above occurred within the scope of Defendant Hankins' agency relationship with Defendant BHA, or was aided by the existence of that agency relationship.

31. Defendant BHA is liable for the actions of Defendant Hankins.

HUD ADMINISTRATIVE PROCESS

32. On January 26, 2022, Ms. Forister filed a timely fair housing complaint against Defendants BHA and Hankins with the United States Department of Housing and Urban Development ("HUD") alleging that Defendants discriminated against her in the rental of the subject property because of sex.

33. Pursuant to 42 U.S.C. § 3610, the Secretary of HUD conducted and completed an investigation of the complaint, attempted conciliation without success, and prepared a final investigative report. Based upon the information gathered in the investigation, the Secretary determined that reasonable cause existed to believe that Defendants violated the Fair Housing Act. Therefore, on May 20, 2025, the Secretary issued a Charge of Discrimination, pursuant to 42 U.S.C. § 3610(g)(2)(A), charging Defendants with engaging in discriminatory housing practices on the basis of sex.

34. On June 9, 2025, Ms. Forister elected to have the claims asserted in the HUD Charge of Discrimination resolved in a civil action pursuant to 42 U.S.C. § 3612(a).

35. On June 10, 2025, an Administrative Law Judge issued a Notice of Election to

Proceed in United States Federal District Court and terminated the administrative proceeding on Ms. Forister's complaint.

36. Following this Notice of Election, the Secretary of HUD authorized the Attorney General to commence a civil action, pursuant to 42 U.S.C. § 3612(o).

CAUSE OF ACTION

37. Plaintiff realleges and incorporates by reference the allegations described above.

38. By the actions and statements described above, Defendants have:

a. Denied housing or otherwise made housing unavailable because of sex, in violation of 42 U.S.C. § 3604(a);

b. Discriminated in the terms, conditions, or privileges of the rental of a dwelling, or in the provision of services or facilities in connection therewith, because of sex, in violation of 42 U.S.C. § 3604(b); and

c. Coerced, intimidated, threatened, or interfered with a person in the exercise or enjoyment of, or on account of her having exercised or enjoyed, rights granted or protected by 42 U.S.C. § 3604(a), in violation of 42 U.S.C. § 3617.

39. Ms. Forister is an "aggrieved person" as defined in 42 U.S.C. § 3602(i), and has suffered damages as a result of Defendants' discriminatory conduct.

40. Defendants' discriminatory conduct was intentional, willful, and taken in reckless disregard of the rights of Ms. Forister.

PRAYER FOR RELIEF

WHEREFORE, the United States prays that this Court enter an Order that:

41. Declares that Defendants' actions, policies, and practices, as alleged in this Complaint, violate the FHA;

42. Enjoins Defendants, their agents, employees, and successors, and all other persons in

active concert or participation with them, from:

a. Engaging in discrimination on the basis of sex in any aspect of the rental or lease of a dwelling;

b. Engaging in discrimination on the basis of sex in the terms, conditions, or privileges of rental of a dwelling, or in the provision of services or facilities in connection therewith;

c. Coercing, intimidating, threatening, or interfering with persons in the exercise or enjoyment of, or on account of their having exercised or enjoyed, their rights granted or protected by 42 U.S.C. § 3604(a);

d. Failing or refusing to take such affirmative steps as may be necessary to restore Ms. Forister, as nearly as practicable, to the position she would have been in but for the discriminatory conduct; and

e. Failing or refusing to take such affirmative steps as may be necessary to prevent the recurrence of any discriminatory conduct in the future and to eliminate, to the extent practicable, the effects of Defendants' unlawful housing practices; and

43. Awards monetary damages to Ms. Forister in accordance with 42 U.S.C. §§ 3612(o)(3) and 3613(c)(1).

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

Dated: September 30, 2025

Respectfully submitted,

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