

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,	:	Civil Action No. 4:26-CV-2231
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
VENKATACHALAM MANI,	:	
	:	
Defendant.	:	Filed Electronically

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 Jordan Miller, an aggrieved person as defined by 42 U.S.C. § 3602(i)(1), and her four 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 Middle District of Pennsylvania, and Defendant Venkatachalam Mani does business in the Middle District of Pennsylvania.

THE PARTIES

5. Plaintiff is the United States of America.

6. At all times relevant to this action, Defendant Venkatachalam Mani resided in Pennsylvania at 2514 Shawn Circle, State College, 16801, which is in the Middle District of Pennsylvania and where the sexual harassment occurred.

7. At all times relevant to this action, Mr. Mani owned and managed the residential property located at 118 Waupelani Drive, State College, Pennsylvania 16801 (the “subject property”).

8. At all times relevant to this action, Mr. Mani leased the subject property to Ms. Miller and her four minor children.

FACTUAL ALLEGATIONS

9. In April 2022, Ms. Miller applied for an emergency Housing Choice Voucher.

10. In April 2022, Ms. Miller applied to lease the subject property.

11. On June 11, 2022, Ms. Miller and her four minor children moved into the subject property, with a one-year lease.

12. The subject property is a “dwelling” as defined by the FHA. 42 U.S.C. § 3602(b).

13. In June 2022, Mr. Mani told Ms. Miller he would pay her to help him sort and organize paperwork at his personal residence.

14. On June 14, 2022, Ms. Miller and her then 11-year-old son went to Mr.

Mani's residence located at 2514 Shawn Circle, State College, 16801.

15. When Ms. Miller arrived at Mr. Mani's residence, he did not have a shirt or shoes on and only wore khaki pants.

16. Mr. Mani told the 11-year-old boy to remain upstairs and directed Ms. Miller to the basement where she would assist with the paperwork. The boy sat on a couch that was three feet from the basement steps.

17. Ms. Miller went down the stairs to the basement and saw a room full of papers.

18. In the room, Mr. Mani directed her to a computer chair and began to show her some papers, but then suddenly showed her pictures of a naked man and woman in a sexual act.

19. Ms. Miller told Mr. Mani that she did not feel comfortable with that.

20. Mr. Mani responded that the picture had something to do with the work she was there to do.

21. Mr. Mani then told Ms. Miller that "nipple sucking" prevented breast cancer and showed her papers that purported to be about "nipple sucking."

22. Ms. Miller clearly told him to stop and said she was not comfortable with his comments and the papers he was showing her.

23. During this time, Mr. Mani stood so close to Ms. Miller that their knees touched as he leaned over her in the chair.

24. Ms. Miller stood up and pleaded for Mr. Mani to "stop."

25. Mr. Mani told her: “I just want to suck on them.”

26. Mr. Mani then grabbed Ms. Miller’s nipples and breasts and reached under her dress to grab her buttocks and tried to kiss her.

27. Ms. Miller pushed Mr. Mani’s arms away and managed to maneuver around him and he took his arms off her.

28. As she moved away from Mr. Mani, Ms. Miller approached the steps and saw her son at the top of the stairs.

29. Ms. Miller’s minor son heard her mother say “stop, I’m not comfortable.”

30. Ms. Miller told her son that she was “okay,” and she and Mr. Mani walked out the side of the home so he could show her where to park when she came over to work.

31. Mr. Mani and Ms. Miller then went back into the home. Mr. Mani suggested Ms. Miller go to work on the paperwork in a bedroom.

32. As a result of Mr. Mani’s behavior, Ms. Miller made an excuse why she could not start work that day and fled the residence. As she and her son left, she told her son that Mr. Mani was a “creep.”

33. After Ms. Miller refused Mr. Mani’s sexual advances, Mr. Mani began to show up at the subject property. He told Ms. Miller that she should find a bigger place as it was too small for her and said that she should get renters’ insurance because the place may go up in flames.

34. Mr. Mani also showed up at the subject property trying to give Ms. Miller’s

minor children candy despite Ms. Miller's objections.

35. Mr. Mani told the children that Ms. Miller was a "bad mom" because she would not allow the treats.

36. Because of Mr. Mani's intrusive behavior, Ms. Miller asked her husband, who was not living with her at the time, to move in with her.

37. After Ms. Miller refused Mr. Mani's sexual advances, Mr. Mani failed to maintain the subject property, including the furnace.

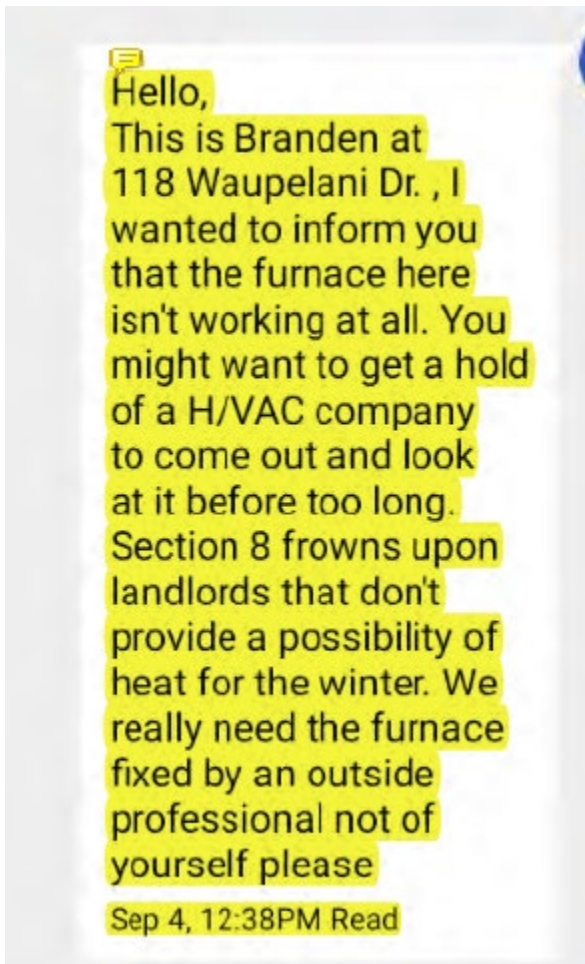
38. On September 2, 2022, Ms. Miller emailed Mr. Mani about maintenance issues at the subject property that needed addressing, including the furnace not working. Ms. Miller stated in the email that she did not want Mr. Mani to do the work because he had previously sexually assaulted her.

39. That same day, Mr. Mani responded to the email, saying "I am extremely sorry and I appolize [sic] for the mistake I have done to you . . . Without your willingness I will never do any thing to you."

40. On that same day, Mr. Mani arrived at the subject property unannounced and uninvited.

41. On September 3, 2022, Ms. Miller reported the June 14, 2022 incident to the local State College Police Department.

42. On September 4, 2022, Ms. Miller's husband texted Mr. Mani that the furnace was broken and requested that repairs be done by an outside professional:

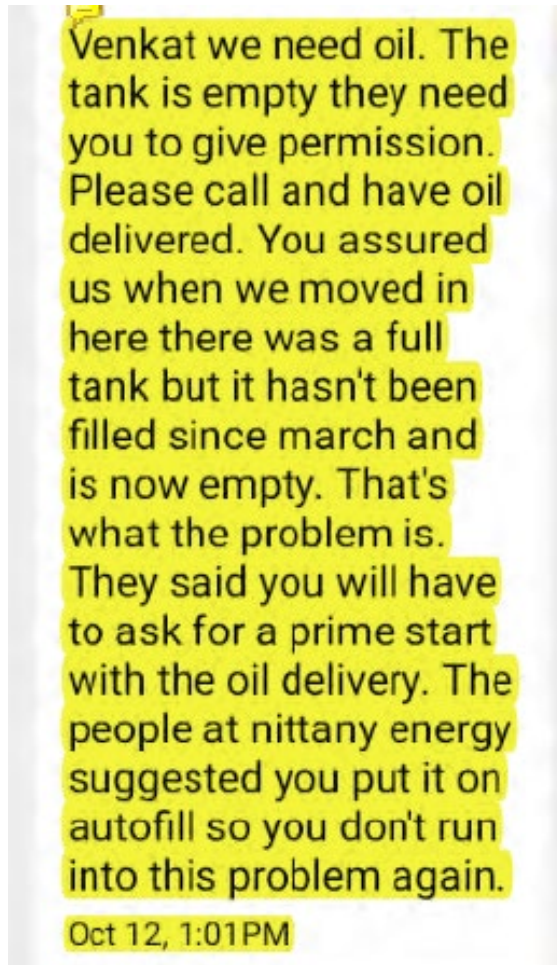


43. On September 6, 2022, Ms. Miller obtained a 30-day Temporary Sexual Violence Protection Order (SVPO) against Mr. Mani from the Court of Common Pleas of Centre County. The SVPO placed Mr. Mani on notice not to contact Ms. Miller or interfere with her safety and housing stability.

44. Centre County Court of Common Pleas issued a final SVPO on September 26, 2022, which it later extended through March 22, 2026. After the final SVPO was issued, Mr. Mani only contacted Ms. Miller through her husband.

45. Despite numerous texts by Ms. Miller's husband, Mr. Mani never hired an outside professional to fix the furnace. For example, on October 12, 2022, Ms. Miller's

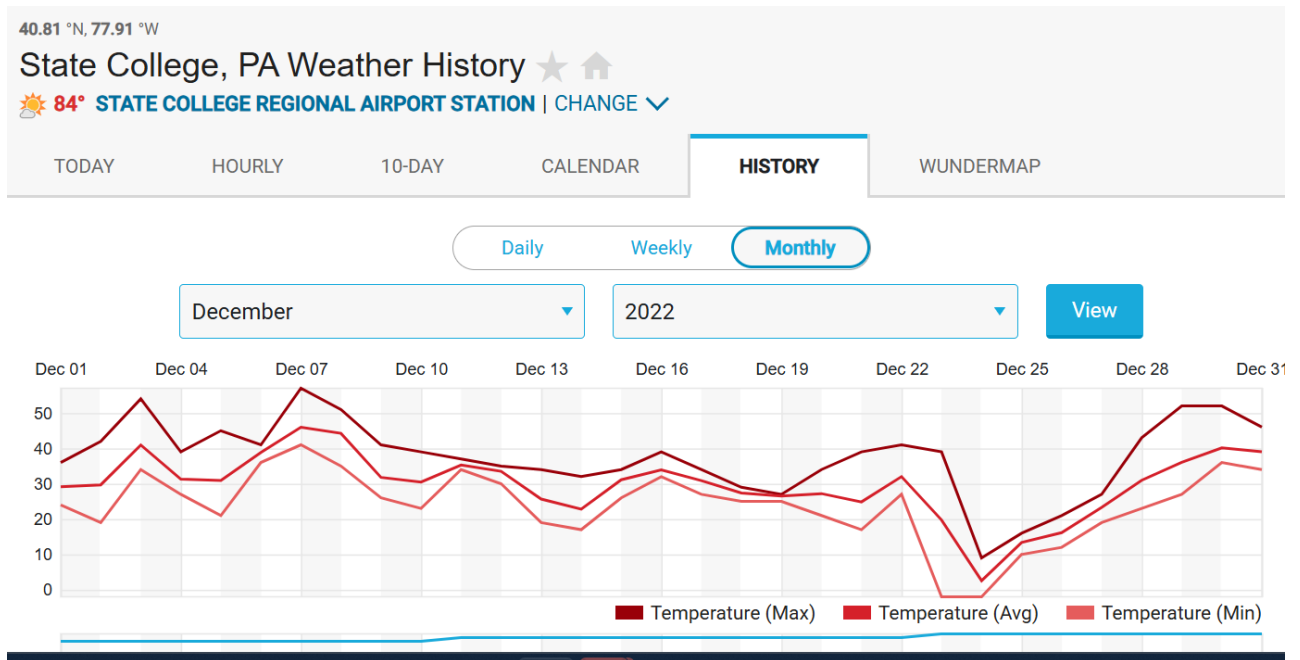
husband sent the following text:



Venkat we need oil. The tank is empty they need you to give permission. Please call and have oil delivered. You assured us when we moved in here there was a full tank but it hasn't been filled since march and is now empty. That's what the problem is. They said you will have to ask for a prime start with the oil delivery. The people at nittany energy suggested you put it on autofill so you don't run into this problem again.

Oct 12, 1:01PM

46. Mr. Mani did not arrange for heating oil to be delivered to the subject property until December 23, 2022. The local temperature in December 2022 fell to as low as zero degrees:



<https://www.wunderground.com/history/monthly/us/pa/state-college/KUNV/date/2022-12> (last visited 07/31/2026).

47. On December 26, 2022, soot appeared throughout the subject property after an apparent furnace fire.

48. Mr. Mani still refused to make necessary repairs to the furnace.

49. On December 30, 2022, a technician from Nittany Energy Company energy came to the house to investigate the fire and “red tagged” the furnace, designating the property as unsafe for occupancy and prohibiting anyone from occupying it.

50. In January 2023, because the subject property was uninhabitable, Ms. Miller and her minor children had to leave the property and were told by a local official that they had to take only what they could carry, forcing them to leave personal items behind.

51. Mr. Mani still did not attempt to repair the furnace so that Ms. Miller and her family could return to the home. Mr. Mani did not assist Ms. Miller with finding

temporary housing or offer to pay for the hotel that she and her children ended up having to live in.

52. Ms. Miller had to resort to asking her friends and family for financial assistance and obtained some support through local housing programs.

53. On July 5, 2023, Centre County Common Pleas Court verified a Police Complaint against Mr. Mani regarding his indecent assault of Ms. Miller in violation of 18 U.S.C. § 3126(a)(1) and harassment of Ms. Miller in violation of 18 U.S.C. § 2709(a)(1).

54. On July 6, 2023, the detective assigned to the matter completed an Affidavit of Probable Cause, affirming Ms. Miller's allegations.

55. On June 13, 2024, Mr. Mani pleaded Nolo Contendere to the charges of indecent assault and harassment. The Court sentenced Mr. Mani to two years of probation, no contact with Ms. Miller and her family, and an order to stay 1,000 feet away from her and her family.

56. Through the conduct described above, Mr. Mani subjected Ms. Miller to discrimination on the basis of sex, including unsolicited and unwelcome sexual harassment that was severe or pervasive, including unwelcome sexual touching, sexual comments, and sexual advances, and retaliated against Ms. Miller when she rejected Mr. Mani's advances.

57. The above-described actions and conduct of Mr. Mani caused Ms. Miller and her children to suffer loss of housing, economic harm, physical harm, fear, anxiety, and emotional distress.

HUD ADMINISTRATIVE PROCESS

58. On December 2, 2022, Ms. Miller filed a timely fair housing complaint against Mr. Mani with the United States Department of Housing and Urban Development (“HUD”) alleging that Mr. Mani discriminated against her in the rental of the subject property because of sex.

59. 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 Mr. Mani violated the Fair Housing Act. Therefore, on June 17, 2026, the Secretary issued a Charge of Discrimination, pursuant to 42 U.S.C. § 3610(g)(2)(A), charging Mr. Mani with engaging in discriminatory housing practices on the basis of sex.

60. On July 6, 2026, Ms. Miller 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).

61. On July 7, 2026, an Administrative Law Judge issued a Notice of Election to Proceed in United States Federal District Court and terminated the administrative proceeding on Ms. Miler’s complaint.

62. 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

63. Plaintiff realleges and incorporates by reference the allegations described

above.

64. By the actions and statements described above, Defendant has 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, in violation of 42 U.S.C. § 3617.

65. Ms. Miller and her four minor children are “aggrieved persons” as defined in 42 U.S.C. § 3602(i), and have suffered damages as a result of Mr. Mani’s discriminatory conduct.

66. Mr. Mani’s discriminatory conduct was intentional, willful, and taken in reckless disregard of the rights of Ms. Miller and her four minor children.

PRAYER FOR RELIEF

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

67. Declares that Mr. Mani’s actions, policies, and practices, as alleged in this Complaint, violate the FHA;

68. Enjoin Mr. Mani, his 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;
- d. Failing or refusing to take such affirmative steps as may be necessary to restore Ms. Miller and her four minor children, as nearly as practicable, to the position they 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 Mr. Mani's unlawful housing practices; and

69. Awards monetary damages to Ms. Miller and her four minor children in accordance with 42 U.S.C. §§ 3612(o)(3) and 3613(c)(1).

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

Dated: August 5, 2026

Respectfully submitted,

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