

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALFRED FALGIANI, JR.,

Defendant.

Civil Action No.

COMPLAINT

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. §§ 3601–3619 (“Fair Housing Act”).

JURISDICTION AND VENUE

2. The Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1345, and 42 U.S.C. § 3614(a).

3. Venue is proper in the Northern District of Ohio under 28 U.S.C. § 1391(b) because the actions and omissions giving rise to the United States’ allegations occurred in this judicial district and the Defendant resides in this district.

DEFENDANT AND SUBJECT PROPERTIES

4. Defendant Alfred Falgiani (“Defendant Falgiani”) resides in Girard, Ohio, which is located within Trumbull County.

5. During the period from at least 1999 through the present (the “relevant time”), Defendant Falgiani owned and managed approximately eight residential rental properties (“Subject Properties”) in Girard, McDonald, and Struthers, Ohio, including single-family homes, duplexes, and a triplex. The Subject Properties include: 1041 Shannon Road, 1070/1072

Woodlawn Avenue, 1071/1075 Woodlawn Avenue, 1171/1173 Woodlawn Avenue, and 41/41^{1/2} E Broadway Avenue in Girard; 1020 Annabelle Avenue in McDonald; and 561 Creed Street and 158 Sexton Street in Struthers.

6. During the relevant time, Defendant Falgiani has been actively involved in the management of the Subject Properties, including, but not limited to, showing the properties to prospective tenants, collecting rent, handling maintenance requests, landscaping around the properties, managing tenant utility payments, communicating with tenants regarding paying rent, and initiating eviction proceedings.

7. The Subject Properties are or contain “dwellings” within the meaning of 42 U.S.C. § 3602(b).

DEFENDANT’S DISCRIMINATORY PRACTICES

8. The Defendant has violated the Fair Housing Act, 42 U.S.C. §§ 3601 *et seq.*, by discriminating against persons on the basis of sex in connection with the rental of the Subject Properties.

9. During the relevant time, Defendant Falgiani has subjected female tenants and prospective tenants of the Subject Properties to discrimination on the basis of sex, including, severe, pervasive, and unwelcome sexual harassment. This conduct has included, but has not been limited to:

- a. Offering to grant tangible housing benefits—such as reducing rent or excusing late or unpaid rent—to female tenants and prospective tenants in exchange for sexual favors;
- b. Subjecting female tenants and prospective tenants to unwelcome sexual touching;

- c. Making unwelcome sexual comments and sexual advances to female tenants and prospective tenants;
- d. Entering female tenants' homes with his own key, without notice, permission, or a legitimate reason; and
- e. Taking adverse housing actions, such as initiating eviction actions, or threatening to do so, against female tenants who objected to or refused his sexual advances.

10. For example, from approximately 2017 to 2020, Defendant Falgiani subjected a female tenant to repeated unwelcome and unwanted sexual comments, sexual propositions, pornographic images, and unwelcome sexual contact. Defendant Falgiani's sexual comments and propositions included asking the tenant about her bra size, requesting kisses, commenting on her buttocks, and repeated invitations to dinner or drinks. Defendant Falgiani's unwanted sexual contact included forcibly kissing the tenant on the mouth, groping her breast, groping her buttocks, and pressing his groin against her buttocks. On at least one occasion, while the tenant was paying rent at Defendant Falgiani's home, Defendant Falgiani showed her pornographic images on his computer. On another occasion, Defendant Falgiani indicated that she would not have to pay rent if she submitted to his advances. On several occasions, Defendant Falgiani came to her home without prior notice or permission, including one time when he was intoxicated late in the evening. These actions made the female tenant extremely uncomfortable, and she was scared to be alone with Defendant Falgiani.

11. In another example, from approximately 2017 to 2023, Defendant Falgiani subjected a female tenant to repeated unwelcome and unwanted sexual comments, sexual propositions, and unwelcome sexual contact. On at least one occasion, Defendant Falgiani grabbed the female tenant's breast and attempted to kiss her cheek. On multiple occasions, while the female

tenant was paying rent in his home office, which was also a bedroom, Defendant Falgiani would have the female tenant sit on his bed while he shared salacious stories about women, including about his visits to strip clubs or how he sought women to clean his housing units while topless. On multiple occasions, Defendant Falgiani commented on the female tenant's body. On at least one occasion, Defendant Falgiani indicated that he would exchange rent for sexual favors. The female tenant also believed that on multiple occasions, Defendant Falgiani entered her home without notice or permission when she was not home. Defendant Falgiani's conduct caused the tenant significant stress since he had control over her home, and she was afraid he would evict her.

12. In yet another example, from approximately May to August 2022, Defendant Falgiani subjected a female tenant to repeated unwelcome and unwanted sexual comments and sexual propositions. Defendant Falgiani was a constant presence around the property and would repeatedly make comments about the female tenant's physical appearance. On multiple occasions, Defendant Falgiani entered the female tenant's home without notice or permission, including in the evening. On at least one occasion, while the female tenant was paying rent in Defendant Falgiani's home office, which was also a bedroom, Defendant Falgiani described a previous sexual relationship he had with a young woman, where he identified himself as her "sugar daddy," or words to that effect. He then indicated that he would like to have a similar relationship with the female tenant. Defendant Falgiani's conduct made her extremely anxious and uncomfortable, and she felt unsafe in her own home.

13. From approximately 2022 to 2023, Defendant Falgiani subjected a female tenant named Amber Howard to repeated unwelcome and unwanted sexual comments, sexual propositions, and unwelcome sexual contact. Among other unwelcome conduct, Defendant Falgiani repeatedly asked to see her breasts, groped her breasts, and asked her to go out with him

and have sex with him in exchange for reduced rent. On October 22, 2024, Amber Howard filed a lawsuit against Defendant Falgiani alleging that he violated the Fair Housing Act by sexually harassing her during her tenancy. *See Howard v. Falgiani*, 4:24-cv-01841 (N.D. Ohio).

14. The experiences of the women described above were not the only instances of Defendant Falgiani's sexual harassment of tenants. Rather, they were part of his longstanding pattern or practice of sexual harassment of numerous tenants from at least 2008.

15. The conduct of Defendant Falgiani described above caused female tenants to suffer physical harm, fear, anxiety, and emotional distress, and interfered with their ability to secure and maintain rental housing for themselves and their families.

CAUSE OF ACTION

FAIR HOUSING ACT

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

17. By the actions described above, the Defendant has:

- a. Denied dwellings or otherwise made dwellings 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 dwellings, or in the provision of services or facilities in connection therewith, because of sex, in violation of 42 U.S.C. § 3604(b);
- c. Made statements with respect to the rental of dwellings that indicate a preference, a limitation, or discrimination based on sex, in violation of 42 U.S.C. § 3604(c); and
- d. Coerced, intimidated, threatened, or interfered with persons in the exercise or enjoyment of, or on account of their having exercised or enjoyed, their

rights granted or protected by the Fair Housing Act, in violation of 42 U.S.C. § 3617.

18. Under 42 U.S.C. § 3614(a), the Defendant's conduct constitutes:

- a. A pattern or practice of resistance to the full enjoyment of the rights granted by the Fair Housing Act, and
- b. A denial to a group of persons of rights granted by the Fair Housing Act that raises an issue of general public importance.

19. Female tenants and prospective tenants have been injured by the Defendant's discriminatory conduct. These persons are "[a]grieved person[s]" as defined in 42 U.S.C. § 3602(i) and have suffered damages as a result of the Defendant's conduct.

20. The Defendant's discriminatory conduct was intentional, willful, or taken in reckless disregard of the rights of others.

PRAYER FOR RELIEF

WHEREFORE, the United States requests that the Court enter an Order that:

- a. Declares that the Defendant's discriminatory practices violate the Fair Housing Act, as amended, 42 U.S.C. §§ 3601-3619;
- b. Enjoins the Defendant, his agents, employees, and successors, and all other persons in active concert or participation with him, from:
 - i. Discriminating on the basis of sex, including engaging in sexual harassment, in any aspect of the rental of a dwelling;
 - ii. Interfering with or threatening to take any action against any person engaged in the exercise or enjoyment of rights granted or protected by the Fair Housing Act;

- iii. Failing or refusing to take such affirmative steps as may be necessary to restore, as nearly as practicable, the victims of the Defendant's past unlawful practices to the position they would have been in but for the discriminatory conduct; and
- iv. 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, as nearly as practicable, the effects of the Defendant's unlawful practices;
- c. Awards monetary damages to each person aggrieved by the Defendant's discriminatory conduct, under 42 U.S.C. § 3614(d)(1)(B);
- d. Assesses a civil penalty against the Defendant to vindicate the public interest, under 42 U.S.C. § 3614(d)(1)(C); and
- e. Awards such additional relief as the interests of justice may require.

Dated: August 24, 2026

Respectfully submitted,

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