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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY and HOUSING AUTHORITY OF THE COUNTY OF SACRAMENTO, Defendants.	Case No: **COMPLAINT** *Demand for Jury Trial*

Plaintiff, the United States of America (the "United States"), alleges as follows:

I. NATURE OF THE ACTION

1. The United States brings this action to enforce the Housing Rights Subpart of the Violence Against Women Act Reauthorization Act of 2022, 34 U.S.C. §§ 12491–12496 ("VAWA").

2. The United States brings this action for injunctive relief and monetary damages on behalf of Complainant Jane Doe and her minor daughter under 34 U.S.C. §§ 12494(c) and 12495(d) and 42 U.S.C. § 3612(o).

3. The United States alleges that Defendants Sacramento Housing and Redevelopment Agency and Housing Authority of the County of Sacramento violated 34 U.S.C. § 12491(e) by failing to provide a VAWA emergency transfer to safe housing for Doe and her minor child for nearly five years after Doe requested and was approved for a VAWA emergency transfer.

II. JURISDICTION AND VENUE

4. The Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1345, 34 U.S.C. §§ 12494(c) and 12495(d), and 42 U.S.C. § 3612(o).

5. 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 California.

6. Pursuant to 34 U.S.C. §§ 12494(c) and 12495(d), the Secretary of Housing and Urban Development and the Attorney General are statutorily mandated to implement and enforce the protections of VAWA's Housing Rights Subpart consistent with, and in a manner that provides, the same rights and remedies provided for in title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.).

III. PARTIES AND THE SUBJECT PROPERTY

7. Plaintiff is the United States of America.

8. Complainant Doe and her minor daughter are tenants of a two-bedroom public housing unit located in Sacramento County.

9. Defendant Housing Authority of the County of Sacramento ("County HA") owns the public housing property in which Doe resides and is a Public Housing Agency ("PHA"), as defined by 24 C.F.R. § 5.100.

10. Defendant Sacramento Housing and Redevelopment Agency ("SHRA") is responsible for operating Defendant County HA, including the administration of its public housing programs and the management of its public housing properties. SHRA's portfolio includes over 3,000 public housing units in the City and County of Sacramento.

11. The public housing which Defendants own and operate is assisted under the Public Housing Program of the United States Housing Act of 1937, 42 U.S.C. § 1437.

12. Defendants operate a covered housing program under 34 U.S.C. § 1249l(a)(3)(H) and (P) and are subject to VAWA's emergency transfer provisions.

13. Doe has been a resident and participant in SHRA's public housing for over 20 years. She previously lived at a public housing property owned by the City of Sacramento Housing Authority and operated by SHRA.

14. She moved to her current unit around June 2017, pursuant to a prior VAWA-related emergency transfer due to domestic violence involving her minor daughter's father.

IV. FACTUAL ALLEGATIONS

Neighbor Harassment and Restraining Order

15. Around June 2021, Doe's downstairs neighbor began to routinely harass and stalk Doe and her minor daughter.

16. For example, the neighbor followed Doe and her daughter whenever they went outside. The neighbor yelled threats and cursed at them, for example, calling them "bitches" and threatening to "kick their ass." The neighbor told Doe she would come up there and "fuck you up."

17. The neighbor's harassment and stalking continued for months.

18. Doe tried to ignore the neighbor, but Doe was extremely afraid. Doe felt that "it became a terror living there." She was afraid to leave her home even to go to the store or pick up her daughter from school.

19. In early December 2021, the neighbor demanded Doe give her $70 for laundry to address damage she claimed was caused by a water leak in Doe's unit. Doe told the neighbor to call a housing manager, but the neighbor threated to "beat [her] ass."

20. Doe called the police. The police knocked on the neighbor's door, but she did not answer. The next day, the neighbor told Doe that she would "beat [her] ass" for calling the police.

21. That evening, the neighbor came outside when she saw Doe walking to the store. She started yelling, "you got my mother fucking money for my laundry?" The neighbor's young son began following Doe and her daughter, calling them "bitches" and saying "you cop caller, give my momma money for laundry" as the neighbor urged him on.

22. Doe reported the neighbor's threats to SHRA on December 7, 2021.

23. On December 10, 2021, Doe filed a civil harassment case against the neighbor and obtained a temporary restraining order ("TRO"). The TRO states that a copy of the order would be served by the sheriff or marshal without charge because "[t]he Order is based on unlawful violence, a credible threat of violence, or stalking."

24. On December 29, 2021, the Superior Court issued a restraining order against the neighbor effective for three years. The order prohibited a range of harassing conduct, including stalking. It required the neighbor to stay at least 10 yards away from Doe, her daughter, and their home, work, or school. It prohibited the neighbor from contacting Doe or taking action to obtain her address or location.

VAWA Emergency Transfer Request for Stalking

25. On December 14, 2021, Doe spoke with SHRA Community Property Representative Heroji Pratt at an SHRA office about her need to move.

26. That same day, she submitted a written request for an emergency VAWA transfer due to the neighbor's stalking and threats.

27. On the form, Doe identified the neighbor as the perpetrator and indicated that the incidents occurred from June to December 2021. She attached a copy of the TRO, restraining order petition, and several letters she had submitted to the court in support of her case which detailed the neighbor's stalking and the impacts on Doe and her daughter, including Doe's fear of the neighbor's continued threats of violence.

28. Pratt documented receipt of the request in Doe's tenant file, noting, "VAWA request returned to office today along with restraining order on downstairs neighbor. Submitted to Regional for decision."

29. Around December 30, 2021, Doe returned to SHRA's office and dropped off a copy of the three-year restraining order against the neighbor.

30. Doe received no response to her VAWA transfer request, though she made several inquiries about the status.

31. Around January 2022, Pratt went on parental leave, and a temporary worker named David Rossi took over his duties.

32. On March 11, 2022, Rossi emailed Program Technician Deborah Cyrus, who maintains the transfer waitlists, and inquired about Doe's position on the VAWA transfer list. Cyrus responded that Doe was not on the VAWA transfer list, and that Doe "will need to fill out VAWA documentation and a transfer request form to be added."

33. SHRA took no further action at that time to locate the missing request. Staff also did not inform Doe that she was not on the VAWA transfer waitlist.

34. In early July 2022, Doe had another incident with the neighbor.

35. On July 8, 2022, Doe and her sister met with Pratt, who had returned from leave. Pratt did not know the status of Doe's VAWA request.

36. Following this meeting, Pratt emailed his supervisor, Maria Velazquez: "We have a resident [Jane Doe] who filled out a VAWA in December, I [was] wondering if she got approved and is on the transfer list? She says she had another run in with the lady on the restraining order and is wanting to move ASAP. I have police reports and restraining order in office dated back in Dec of 2021. She started crying in office wanting a transfer out of that unit we need to get her out[.]"

37. Doe heard nothing from SHRA regarding her VAWA request following this meeting.

Additional VAWA Basis for Transfer

38. In the summer of 2022, Doe's minor daughter reported that she had been sexually assaulted by the daughter's father (Doe's abusive former partner). Doe was initially unaware of this assault, and when she learned of it, she reported it to the police.

39. Around this time, Doe's abusive former partner discovered Doe and her minor daughter's home address and came to the property. A neighbor called the police.

40. Around September 2022, Doe reported these incidents to Pratt, explaining that she and her daughter now needed to move to a safe unit even more urgently so that her abusive former partner would not know their location.

41. She made this request orally to Pratt, and he did not request written documentation.

VAWA Request Approved but Not Fulfilled

42. On September 26, 2022, SHRA approved Doe's December 14, 2021, VAWA request and added her to the VAWA transfer waitlist.

43. The approval date was entered as the transfer priority date, despite nine months having elapsed since the date of her request. Because of this, some tenants who made emergency transfer

requests on later dates but who were approved more quickly had a higher priority to transfer than she did.

44. SHRA employees could not fully explain the delay in deciding Doe's request. Velazquez speculated that "stuff was misplaced by the temp" while Pratt was on leave. She could not explain why an additional three months elapsed after he returned from leave.

45. SHRA did not notify Doe about the approval of her VAWA request when she was added to the waitlist. SHRA's practice was that it did not generally provide written notice to tenants regarding decisions made on VAWA requests.

Defendants Improperly Prioritized Abatement Transfers over VAWA Transfers

46. Another year and a half passed before Defendants took additional action on Doe's request. During this time, SHRA prioritized transferring tenants approved for emergency transfers due to housing conditions over tenants approved for emergency transfers under VAWA.

47. Defendants' policies for emergency transfers are set forth in its Admissions and Continued Occupancy Policy ("ACOP").

48. The version of the ACOP in effect at that time stated that housing conditions transfers and VAWA transfers were both "emergency" transfers and received equal priority.

49. After Doe was added to the transfer waitlist, SHRA offered transfers to 2-bedroom units to at least 18 tenants on the "abatement" (housing conditions) emergency transfer list, all of whom were approved for emergency transfers more recently than Doe's September 26, 2022, approval date.

50. If SHRA had followed its emergency transfer policy as written in the ACOP, Doe would have been offered a unit before these tenants.

51. Some tenants were offered abatement transfers within days of being added to the waitlist; most were offered units within 2-3 months.

52. Many tenants waiting for abatement transfers had been relocated to hotels, so were not in immediate danger.

Doe Declines Transfer to Unsafe Unit

53. During this time, Doe continued to follow up with SHRA about her need for a transfer.

54. On March 21, 2024, Doe signed the HUD complaint underlying this case. That same day, HUD sent a letter informing Defendants of the complaint and requesting information.

55. Around April 4, 2024 (two weeks after HUD notified Defendants of Doe's complaint), Defendants offered Doe a VAWA emergency transfer to a 2-bedroom public housing unit in Sacramento.

56. Doe declined the unit, explaining that she had lived at that same Sacramento public housing community at the time of her 2017 VAWA emergency transfer. Her abuser's family is still near that location, and she did not feel it was safe for her to return.

57. Under VAWA, a tenant determines whether a unit is safe.

58. Defendants assert they were unaware of the prior 2017 VAWA emergency transfer at the time they made the unit offer.

59. From April 2024, through today's date, Defendants have not offered Doe another unit.

Defendants Stop Fulfilling Emergency Transfers

60. Around the first or second quarter of 2024, Defendants stopped offering unit transfers to public housing tenants on the transfer waitlist, except on a rare case-by-case basis.

61. Instead, it prioritized attempting to increase its occupancy rate to 96% as a step towards improving the housing authorities' performance and removing the "troubled" designation assigned by HUD.

62. During this time, through at least the end of 2024, available public housing units were offered to new applicants from the public housing waitlist rather than current tenants on the transfer waitlist.

63. Tenants on the emergency transfer and other waitlists did not receive unit offers, with rare exceptions made at the discretion of the managers.

64. As of October 2026, Doe has not received another unit offer, despite there being available two-bedroom public housing units at properties other than her current or former public housing properties during that time.

65. Defendants have also not assisted Doe in locating alternate housing, such as facilitating a transfer to another covered housing program.

66. To date, Defendants have failed to allow Doe to move to a safe unit, nearly five years after she submitted her VAWA emergency transfer request and over four years after Defendants approved that VAWA emergency transfer request.

HUD Complaint and Charge of Discrimination

67. On or around March 21, 2024, Complainant filed a timely complaint with HUD alleging that Defendants had engaged and was continuing to engage in one or more discriminatory housing practices.

68. In accordance with 34 U.S.C. §§ 12494(c) and 12495(d) and 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.

69. Based on the information gathered in the investigation, the Secretary determined that reasonable cause existed to believe that Defendants violated the Housing Rights Subpart of the Violence Against Women Act Reauthorization Act of 2022, 34 U.S.C. §§ 12491–12496.

70. On September 28, 2026, the Secretary issued a Charge of Discrimination under 34 U.S.C. § 12495(d) and 42 U.S.C. § 3610(g)(2)(A), charging that Defendants violated 34 U.S.C. § 12491(e) when they unreasonably denied Jane Doe a VAWA emergency transfer.

71. On October 2, 2026, Complainant Doe elected to have the charge resolved in a federal civil action under 34 U.S.C. §§ 12494(c) and 12495(d) and 42 U.S.C. § 3612(a).

72. On October 5, 2026, the Administrative Law Judge issued a Notice of Election to Proceed in United States Federal District Court and terminated the administrative proceedings.

V. CAUSE OF ACTION

VIOLENCE AGAINST WOMEN ACT

1. The United States realleges and incorporates by reference herein the allegations contained in Paragraphs 1 through 72 as if set forth here in full.

2. By the conduct described in the foregoing paragraphs, Defendants failed to adopt and implement an emergency transfer plan that would allow Doe, who it had determined was eligible for a VAWA-related emergency transfer and who had expressly requested a transfer based on her reasonable belief that she was threatened with imminent harm, to transfer to another available and safe dwelling unit assisted under a covered housing program, in violation of 34 U.S.C. § 12491(e)(1).

3. Complainant and her minor daughter are "aggrieved persons" within the meaning of 42 U.S.C. § 3602(i) and 34 U.S.C. §§ 12494(c) and 12495(d), and have suffered damages, including emotional distress, as a result of Defendants' unlawful conduct.

4. Defendants' conduct was intentional, willful, or taken in reckless disregard of the rights of Complainant.

VI. PRAYER FOR RELIEF

WHEREFORE, the United States requests that this Court enter an order that:

a. Declares that the Defendants' discriminatory practices, as alleged in this complaint, violate the Housing Rights Subpart of the Violence Against Women Act Reauthorization Act of 2022, 34 U.S.C. §§ 12491–12496;

b. Enjoins the Defendants, their agents, employees, and successors, and all other persons in active concert or participation with them from violating 34 U.S.C. § 12491(e) and requires them to adopt and implement an emergency transfer plan that allows Doe and her daughter to transfer to safe dwelling unit assisted under a covered housing program;

c. Awards monetary damages, including compensatory and emotional distress damages, to Complainant Jane Doe under 42 U.S.C. §§ 3612(o)(3) and 3613(c)(1), and 34 U.S.C. §§ 12494(c) and 12495(d); and

d. Awards such additional relief as the interests of justice may require.

VII. DEMAND FOR JURY TRIAL

In accordance with Rule 38 of the Federal Rules of Civil Procedure, the United States hereby demands a trial by jury.

Dated: November 2, 2026

Respectfully Submitted,

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