

6. The Defendants Herbert Bolt and Betty Bolt both act as rental managers of Hickory Plantation Apartments. At all times relevant to this complaint, the Defendants Herbert and Betty Bolt participated in and were responsible for the management and operation of Hickory Plantation Apartments.
7. Hickory Plantation Apartments are dwellings within the meaning of the Fair Housing Act, 42 U.S.C. § 3602(b).
8. At all times relevant to this complaint, the Defendants have had a policy of refusing to allow residents at Hickory Plantation Apartments to keep dogs, including dogs used as service animals to assist persons with a handicap.
9. In November 2006 and January 2007, the United States Department of Justice conducted testing to evaluate the Defendants' compliance with the Fair Housing Act. Testing is a simulation of a housing transaction that compares responses given by housing providers to different types of home-seekers to determine whether illegal discrimination is occurring.
10. The testing undertaken by the United States revealed that the Defendants are engaged in housing practices that discriminate on the basis of handicap at Hickory Plantation Apartments, by refusing to make reasonable accommodations in their no-dog policy when such accommodations may be necessary to afford a person with a handicap equal opportunity to use and enjoy a dwelling. Such conduct has included, but is not necessarily limited to, refusing to allow guide dog users with vision impairments to reside in their apartments.

11. The Defendants, through the actions described above, have:

(a) Discriminated in the rental of, or otherwise made unavailable or denied, dwellings to renters because of handicap, in violation of 42 U.S.C. § 3604(f)(1);

(b) Discriminated against persons in the terms, conditions or privileges of rental of a dwelling, or in the provision of services or facilities in connection with a dwelling, because of handicap, in violation of 42 U.S.C. § 3604(f)(2);

(c) Refused to make reasonable accommodations in its rules, policies, practices, and services, when such accommodations may be necessary to afford a person with a handicap equal opportunity to use and enjoy a dwelling, in violation of 42 U.S.C. § 3604(f)(3)(B); and

(d) Made, printed, or published a notice or statement with respect to the rental of a dwelling that indicated a preference, limitation, or discrimination based on handicap, in violation of 42 U.S.C. § 3604(c).

The conduct of the Defendants described above constitutes:

(a) A pattern or practice of resistance to the full enjoyment of rights granted by the Fair Housing Act, 42 U.S.C. §§ 3601-3619; or

(b) A denial to a group of persons of rights granted by the Fair Housing Act, 42 U.S.C. §§ 3601-3619, which denial raises an issue of general public importance.

12. There may be persons who have been the victims of discriminatory housing practices by the Defendants. Such persons are aggrieved persons as defined in 42 U.S.C. § 3602(i), and may have suffered injuries as a result of the Defendants' conduct described above.

13. The discriminatory actions of the Defendants were intentional, willful, and taken in disregard of the rights of the victims of this discrimination.

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

1. Declares that the Defendants' policies and practices, as alleged herein, violate the Fair Housing Act;

2. Enjoins the Defendants, their officers, employees, agents, successors and all other persons in active concert or participation with them, from:

(a) Discriminating in the rental, or otherwise making unavailable or denying dwellings to renters because of handicap, in violation of 42 U.S.C. § 3604(f)(1);

(b) Discriminating against any person in the terms, conditions, or privileges of rental of a dwelling, or in the provision of services or facilities in connection with such dwelling because of handicap, in violation of 42 U.S.C. § 3604(f)(2);

(c) Failing or refusing to make reasonable accommodations as required by 42 U.S.C. § 3604(f)(3)(B);

(d) Making, printing or publishing any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that limits, or discriminates on the basis of handicap, in violation of 42 U.S.C. § 3604(c); and

(e) Failing or refusing to take such affirmative steps as may be necessary to restore, as nearly as practicable, the victims of the Defendants' unlawful practices to the position they would have been in but for the discriminatory conduct.

3. Awards monetary damages, pursuant to 42 U.S.C. § 3614(d)(1)(B), to all persons aggrieved by the Defendants' discriminatory practices; and

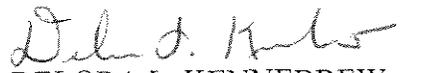
4. Assesses a civil penalty against the Defendants in an amount authorized by 42 U.S.C. § 3614(d)(1)(C), to vindicate the public interest.

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

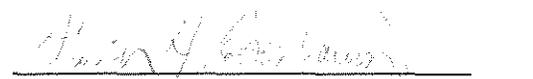
Dated: Sept. 27, 2007

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