

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	Civil Action No.
)	
Plaintiff,)	
)	
v.)	
)	
RIDGE WAY MANAGEMENT, LTD.;)	COMPLAINT
EMIL BAGI; 35590 CENTER RIDGE)	
ROAD TRUST; and ALEXANDRA R.)	
LARSON, in her Capacity as TRUSTEE)	Jury Trial Demanded
OF 35590 CENTER RIDGE ROAD)	
TRUST,)	
)	
Defendants.)	
_____)	

The United States of America alleges as follows:

1. This action is brought by the United States to enforce the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601-3619.
2. This 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 under 28 U.S.C. § 1391(b), because the claims alleged herein arose with respect to one or more residents of and rental housing located in the Eastern District of Ohio.
4. Ridge Plaza Apartments consists of approximately thirty-six (36) apartments, located at 6751 Ridge Plaza Drive, North Ridgeville, Ohio.
5. Defendant Ridge Way Management, Ltd. is an Ohio limited liability corporation engaged in the management of residential and commercial properties in Ohio. Defendant Ridge Way

Management, Ltd. has been retained to manage Ridge Plaza Apartments by its owner, Defendant 35590 Center Ridge Road Trust and its Trustee, Defendant Alexandra R. Lawson.

6. Defendant Emil Bagi is a resident of North Ridgeville, Ohio. He, along with his wife, incorporated Ridge Way Management, Ltd., and he serves as the rental agent for Ridge Plaza Apartments.

7. The apartment units at Ridge Plaza Apartments are dwellings within the meaning of the Fair Housing Act, 42 U.S.C. § 3602(b).

8. During March and April of 2013, the United States Department of Justice conducted testing at Ridge Plaza Apartments, using both African-American testers and white testers, to evaluate Defendants' compliance with the Fair Housing Act. Testing is a simulation of a housing transaction that compares information and treatment given by housing providers to different types of home-seekers to determine whether illegal discrimination is occurring.

9. The series of fair housing tests undertaken by the United States at Ridge Plaza Apartments revealed that Defendants are engaged in housing practices that discriminate on the basis of race or color at Ridge Plaza Apartments, including:

- a. Offering more favorable rental terms and conditions -- including lower rents and a lower application fee -- to white persons than to similarly situated African-American persons;
- b. Showing apartments to white persons and showing them the amenities available at Ridge Plaza, while not showing similarly situated African-American persons such apartments or amenities; and
- c. Falsely telling African-American persons, but not white persons, that apartments are not available for inspection when they are in fact so available.

10. Defendants have been unable to identify any African-American individual who has executed a lease for an apartment at Ridge Plaza Apartments at any time since they acquired ownership of the property in 1995.

11. The conduct of Defendants described above in Paragraph 9 constitutes:

- a. Discrimination against persons in the terms, conditions, or privileges of rental of a dwelling or in the provision of services in connection therewith, because of race or color in violation of Section 804(b) of the Fair Housing Act, 42 U.S.C. § 3604(b); and
- b. Misrepresentations regarding the availability of dwellings available for inspection on the basis of race or color, in violation of Section 804(d) of the Fair Housing Act, 42 U.S.C. § 3604(d).

12. The conduct of 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, et seq.; and/or
- b. A denial to a group of persons of rights granted by the Fair Housing Act, 42 U.S.C. §§ 3601, et seq., which denial raises an issue of general public importance.

13. Persons who may have been victims of Defendants' discriminatory housing practices are "aggrieved persons" as defined in the Fair Housing Act, 42 U.S.C. § 3602(i), and may have suffered damages as a result of the conduct described above.

14. Defendants' conduct described above was intentional, willful, and taken in disregard for the rights of others.

WHEREFORE, the United States prays that the Court enter an order that:

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

2. Enjoins Defendants, their officers, employees, agents, successors, and all other persons in active concert or participation with any of them, from:
 - a. Discriminating against any person on the basis of race or color in any aspect of the rental of a dwelling;
 - b. Failing or refusing to notify the public that dwellings owned or operated by Defendants are available to all persons on a non-discriminatory basis;
 - c. Failing or refusing to take such affirmative steps as may be necessary to restore, as nearly as practicable, the victims of Defendants' unlawful practices to the position they would have been in but for the discriminatory conduct; and
 - d. 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 practices;
3. Awards monetary damages to all persons harmed by Defendants' conduct, pursuant to the Fair Housing Act, 42 U.S.C. § 3614(d)(1)(B); and
4. Assesses a civil penalty against Defendants to vindicate the public interest in an amount authorized by the Fair Housing Act, 42 U.S.C. § 3614(d)(1)(C), and 28 C.F.R. § 85.3(b)(3).

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

ERIC H. HOLDER, JR.
Attorney General

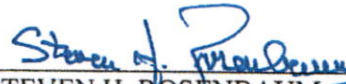


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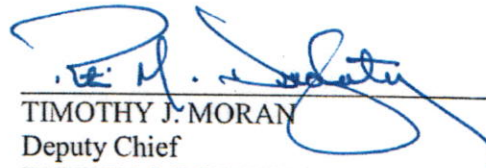
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