

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELAINE MINTZES and ALLEN S.
MINTZES, d/b/a CASTLE REALTY
COMPANY,

Defendant.

CIVIL ACTION NO. _____

COMPLAINT

The United States of America, by John N. Mitchell,
Attorney General, alleges:

1. This is an action brought by the Attorney
General pursuant to Title VIII of the Civil Rights Act
of 1968, 42 U.S.C. 3601, et seq.

2. This Court has jurisdiction of this action
under 28 U.S.C. 1345.

3. Defendants Elaine Mintzes and Allen S. Mintzes
reside in the District of Maryland. They own and operate
the Castle Realty Company, an unincorporated company
engaged in the real estate business, in Baltimore, Maryland.

4. Defendants follow a policy and practice, for
profit, of inducing and attempting to induce persons to
sell dwellings by representations regarding the entry
and prospective entry into the neighborhood of persons
of a particular race or color.

5. Pursuant to the policy and practice described
in the preceding paragraph the defendants, since January 1
1969, have for profit induced and attempted to induce the

owners of certain dwellings, presently occupied by white persons, on Woodbourne Avenue in Baltimore, Maryland, to sell those dwellings by representations regarding the entry and prospective entry of Negroes into the neighborhood. This conduct of defendants is in violation of Section 804(e) of the Civil Rights Act of 1968, 42 U.S.C. 3604(e).

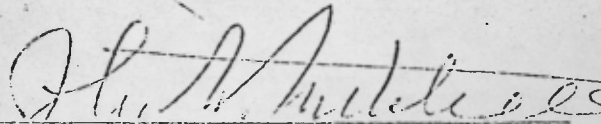
6. The acts and practices described in the preceding paragraphs constitute a pattern or practice of resistance to the full enjoyment of rights secured by Title VII of the Civil Rights Act of 1968, 42 U.S.C. 3601 et seq.

WHEREFORE, the plaintiff prays that the Court enter an Order

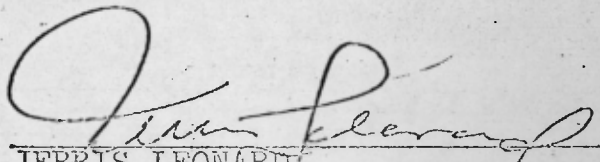
(1) Enjoining defendants, their employees, agents and successors, and all those acting in concert or participation with any of them, from inducing or attempting to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion or national origin, and

(2) Directing that defendants take such affirmative steps as may be necessary and appropriate to correct the effects of the past unlawful practices described in this complaint.

Plaintiff further prays for such additional relief
as the interests of justice may require, together with
the costs and disbursements of this action.

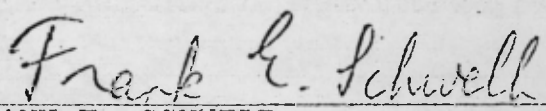


JOHN N. MITCHELL
Attorney General



JERRIS LEONARD
Assistant Attorney General

STEPHEN H. SACHS
United States Attorney



FRANK E. SCHWELB
Attorney
Department of Justice