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9 UNITED STATES DISTRICT COURT
10
11 CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,)
13)
14 Plaintiff,)
15) CIVIL ACTION NO. _____
16 v.)
17)
18 RAY KILZ and MARIA KILZ,) COMPLAINT FOR INJUNCTION
d/b/a AAA RENTALS,) PURSUANT TO CIVIL RIGHTS
19) ACT OF 1968, 42 U.S.C.
20 Defendants.) 3601 et seq.
21)
22 _____

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

25 1. This is an action brought by the Attorney
26 General on behalf of the United States pursuant to the
27 Fair Housing Act of 1968, 42 U.S.C. 3601, et seq.

28 2. This Court has jurisdiction of this action
29 under 28 U.S.C. 1345 and 42 U.S.C. 3613.

30 3. The defendants, Ray Kilz and Maria Kilz are
31 husband and wife. They reside in the Central District of
32 California.

4. The defendants own and operate an apartment

1 rental service in the Los Angeles area, which does business
2 under the name of AAA Rentals (hereinafter referred to as
3 AAA). AAA has offices at the following locations:

4 1414 West Valley
5 Alhambra

6 606 South Brand
7 Glendale

8 5625 Sunset
9 Hollywood

10 8879 West Pico
West Los Angeles

11 5020 South Crenshaw
12 Los Angeles

13 8414 South Crenshaw
14 Inglewood

15 3449 Long Beach Boulevard
16 Long Beach

17 10705 Whittier Boulevard
Whittier

18 AAA is a service relating to the business of renting
19 dwellings within the meaning of 42 U.S.C. 3606.

20
21 5. The defendants secure the permission of land-
22 lords to list with AAA furnished and unfurnished rooms,
23 apartments and houses which the landlords wish to rent.
24 The listing is without fee to the landlord. Subject to
25 the racial restrictions described in this complaint, the
26 defendants, upon payment of a \$15.00 fee, make available
27 information as to vacancies in dwellings listed with AAA to
28 persons who seek to rent a furnished or unfurnished
29 room, house or apartment.
30

31 6. The rooms, houses and apartments described
32 in the preceding paragraph of this complaint are dwellings

1 within the meaning of 42 U.S.C. 3602(b).

2 7. The defendants, in operating AAA Rentals, have
3 discriminated against persons with respect to the rental
4 of dwellings on the basis of race, color, religion and
5 national origin. Specifically, the defendants and their
6 agents have taken the following discriminatory action:
7

8 (a) They have used a code to
9 designate their records to reflect
10 racial or similar restrictions or
11 preferences imposed by particular
12 landlords with respect to the kinds
13 of persons whom those landlords are
14 prepared to accept as tenants;
15

16 (b) In accordance with the in-
17 structions of particular landlords,
18 and in conformity with the coding
19 system described above, they have
20 refused to inform paying clients, on
21 account of race, color, religion and
22 national origin, of the availability
23 of certain dwellings for rental, and
24 have thereby made such dwellings un-
25 available to these clients;
26

27 (c) They have failed to take adequate
28 steps to correct the effects of past
29 discrimination.
30

31 8. The defendants' conduct, described in paragraph 7
32 of this complaint is in violation of 42 U.S.C. 3604(a)

1 and (d), and 42 U.S.C. 3606 and constitutes:

2 (a) A pattern or practice of resistance
3 by the defendants to the full enjoyment
4 of rights secured by the Fair Housing Act
5 of 1968, 42 U.S.C. 3601 et seq.; and
6

7 (b) A denial to groups of persons of
8 the rights granted by the Fair Housing
9 Act, which denial raises an issue of
10 general public importance.

11 WHEREFORE the plaintiff prays that the Court enter
12 an Order enjoining the defendants, their employees, agents,
13 and successors, and all those in active concert and par-
14 ticipation with any of them, from:
15

16 (a) Discriminating against any person
17 on the basis of race, color, religion or
18 national origin, with respect to the rights
19 secured by Title VIII of the Civil Rights
20 Act of 1968, 42 U.S.C. 3601 et seq.; and
21

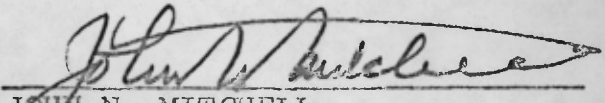
22 (b) Failing or refusing to take such
23 affirmative steps as may be necessary to
24 correct the effects of their past racially
25 discriminatory policies and practices and
26 as may be necessary to insure the full
27 enjoyment by all persons of the rights
28 secured to them by Title VIII.
29

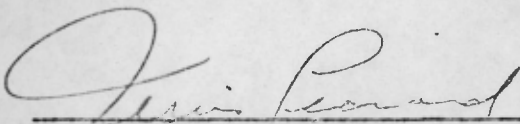
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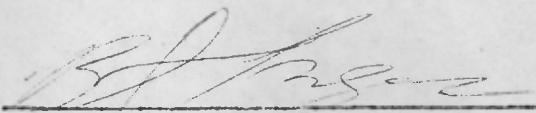
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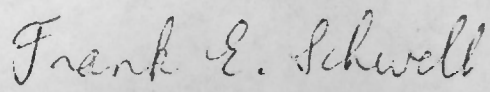
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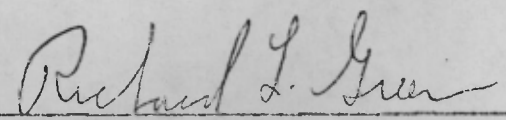
1 Plaintiff further prays for such additional relief
2 as the interests of justice may require, together with
3 the costs and disbursements of this action.
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