

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO.
	)	
	)	<u>COMPLAINT</u>
LUCILE B. KEIL,	)	
	)	
Defendant.	)	
_____	)	

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

1. This is an action brought by the Attorney General on behalf of the United States pursuant to Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3601, et seq., and pursuant to Title II of the Civil Rights Act of 1964, 42 U.S.C. 2000a, et seq.
2. This Court has jurisdiction of this action under 28 U.S.C. 1345, 42 U.S.C. 3613, and 42 U.S.C. 2000a-6.
3. The defendant owns and operates several small apartment houses and rooming houses in the District of Columbia, including in particular a rooming house located at 3321 16th Street, N.W., containing seven rooms and housing approximately twelve boarders. Each of these houses is a dwelling within the meaning of 42 U.S.C. 3602(b).

4. The rooming house described in the preceding paragraph provides lodging to transient guests, within the meaning of 42 U.S.C. 2000a(b)(1). It is a place of public accommodation within the meaning of 42 U.S.C. 2000a(c)(1).

5. The defendant operates the properties described in paragraph 3 of the complaint on a racially discriminatory basis. Pursuant to her racially discriminatory policy, the defendant refuses to accommodate Negroes on account of their race, at the rooming house located at 3321 16th Street, N.W., and refers Negro applicants for rooms at that rooming house to another of her properties, at which one of her Negro tenants takes in only Negro boarders.

6. The defendant has made and continues to make statements with respect to the rental of rooms at the rooming house located at 3321 16th Street, N.W. which indicate a preference, limitation and discrimination based on race and color.

7. The defendant's conduct described in the preceding paragraphs constitutes a pattern or practice of resistance to the full enjoyment of rights secured by Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3601, et seq. Her conduct also constitutes a pattern and practice of resistance to the rights secured by Title II of the Civil Rights Act of 1964, 42 U.S.C. 2000a, et seq., and is of such a nature and is intended

to deny the full exercise of such rights. The defendant's practices are also in violation of 42 U.S.C 1981 and 1982.

WHEREFORE the plaintiff prays that the Court enter an Order enjoining the defendant, her employees, agents and successors, and all those acting in concert or participation with any of them, from

(1) Refusing to make any dwelling available to any person on account of race, color, religion or national origin;

(2) Discriminating against any person in the terms, conditions, or privileges of the sale or rental of any dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion or national origin;

(3) Making, or causing to be made, any statement with respect to the sale or rental of a dwelling that indicates any preference, limitation or discrimination based on race, color, religion or national origin;

(4) Denying any person the full and equal enjoyment of the goods, services, facilities, privileges, advantages and accommodations of any place of public accommodation without discrimination



or segregation on the ground of race,  
color, religion or national origin;  
and

(5) Failing or refusing to take  
adequate affirmative steps to correct  
the effects of defendant's past dis-  
criminatory practices, including but  
not limited to informing the general  
public that the defendant's policy  
shall be to provide fair housing  
opportunities regardless of race.

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

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JOHN N. MITCHELL  
Attorney General

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JERRIS LEONARD  
Assistant Attorney General

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THOMAS A. FLANNERY  
United States Attorney

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FRANK E. SCHWELB  
Attorney  
Department of Justice