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10 IN THE UNITED STATES DISTRICT COURT FOR
11 THE DISTRICT OF ARIZONA

12 UNITED STATES OF AMERICA,)
13)
14 Plaintiff,)
15) CIVIL ACTION NO.
16 v.)
17 MANAGEMENT CLEARING, INC.,) COMPLAINT
18 a corporation,)
19 . Defendant.)

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

22 1. This is an action brought by the Attorney
23 General on behalf of the United States pursuant to
24 Title VIII of the Civil Rights Act of 1968, 42 U.S.C.
25 3601, et seq.

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

28 3. The defendant, Management Clearing, Inc.,
29 is a corporation organized and existing under the laws
30 of the State of Arizona and does business in the State
31 of Arizona.
32

1 4. The defendant owns and operates a real estate
2 business in the Phoenix area known as Management Clearing,
3 Inc., which locates and has listings of available apartments
4 and apartment buildings for rent or sale. The defendant
5 also has franchise agreements with at least five real estate
6 corporations and companies in the Phoenix area and provides
7 its franchise corporations and companies with listings of
8 available apartments and apartment buildings and with other
9 services.
10

11 5. The apartments and apartment buildings referred
12 to in paragraph 4, above, are dwellings within the meaning
13 of 42 U.S.C. 3602(b).
14

15 6. The defendant operates its real estate business
16 on a discriminatory basis. Specifically the defendant has
17 discriminated against Negroes and other persons on account
18 of their race, color and national origin as follows:
19

20 (a) The defendant has refused to allow
21 Negroes and other persons to use the services
22 and facilities of its real estate business in
23 connection with the sale and rental of dwellings
24 and has denied Negroes and other persons access
25 to its apartment listings because of race, color,
26 and national origin.
27

28 (b) The defendant has made and caused to be
29 made statements with respect to the use of
30 its real estate services and facilities
31 in connection with the sale and rental
32 of dwellings which indicate a preference,

1 limitation and discrimination based on
2 race, color and national origin.

3 (c) The defendant has made representations to
4 Negroes, because of race and color, that dwellings
5 are not available for inspection, sale and
6 rental when such dwellings are in fact so
7 available, including representations that
8 there are no integrated apartment buildings
9 available in the Phoenix area when such
10 apartments are in fact so available.
11

12 7. The defendant, by the acts and practices
13 described in the preceeding paragraph, has made
14 dwellings unavailable to persons because of race, color
15 and national origin.
16

17 8. The conduct described in paragraphs 6 and 7
18 above, constitutes:

19 (a) a pattern or practice by the defendant
20 of resistance to the full enjoyment of rights
21 secured by Title VIII of the Civil Rights
22 Act of 1968, 42 U.S.C. §3601, et seq; and
23

24 (b) a denial to groups of persons of the
25 rights granted by Title VIII of the Civil
26 Rights Act of 1968, 42 U.S.C. §3601, et seq.,
27 which denial raises an issue of general public
28 importance.
29

30 WHEREFORE the plaintiff prays that the Court
31 enter an Order enjoining the defendant, its officers,
32

employees, agents and successors, and all those acting in concert or participation with any of them from:

(1) Making any dwelling unavailable to any person on account of race, color, religion or national origin.

(2) Discriminating against any person in the provision of its services or facilities in connection with the sale or rental of any dwelling, including its apartment listing service, because of race, color, religion or national origin.

(3) Making or causing to be made any statement with respect to the use of its services or facilities in connection with the sale or rental of any dwelling that indicates any preference, limitation, or discrimination based on race, color, religion or national origin.

(4) Representing to any person because of race, color, religion or national origin that dwellings are not available for inspection, sale, or rental when such dwellings are in fact so available.

(5) Failing or refusing to take adequate affirmative steps to correct the effects of past discriminatory practices.

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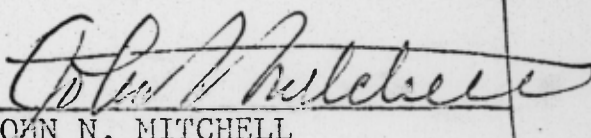
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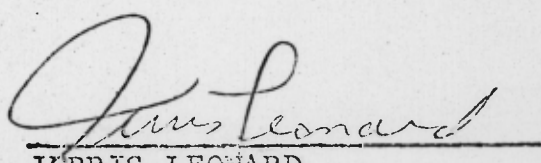
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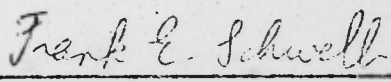
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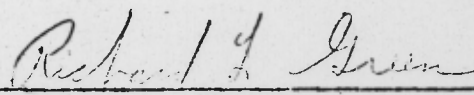
1 Plaintiff further prays for such additional
2 relief as the interest of justice may require, together
3 with the costs and disbursements of this action.
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