

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH and ROSE MILLER and  
UNITED INVESTORS MANAGEMENT  
CORPORATION, d/b/a  
PENNBROOKE TERRACE APARTMENTS,

Defendants.

CIVIL ACTION NO. \_\_\_\_\_

COMPLAINT

The United States of America, plaintiff 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.

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

3. The defendants Joseph and Rose Miller own an apartment-building known as the Pennbrooke Terrace Apartments located at 5052 Silver Hill Court, Suitland, Prince Georges County, Maryland. The defendant United Investors Management Corporation is incorporated in the State of Maryland, and is the managing agent for the building known as Pennbrooke Terrace Apartments, 5052 Silver Hill Court, Suitland, Maryland. This building is a dwelling within the meaning of 42 U.S.C. 3602(b).

4. The defendants follow a policy and practice of racial discrimination against Negroes with respect to the renting of apartments. Pursuant to this racially discriminatory policy, defendants have refused to make apartments available to Negroes and have made statements with respect to the rental of dwellings that indicate a preference, limitation, or discrimination based on race.

5. Defendants have rented 1 of the 404 apartment units in the above named building to a Negro tenant, and have retained the one Negro tenant for the purpose of creating a nondiscriminatory image.

6. The conduct described in the preceding paragraphs constitutes a pattern and 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.

WHEREFORE, the plaintiff prays for an order enjoining the defendants, their employees, agents, successors, and all those acting in concert or participation with any of them from engaging in any racially discriminatory housing practice, including:

(a) Failing or refusing to make any dwelling available to any person on account of race, color, religion, or national origin.

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

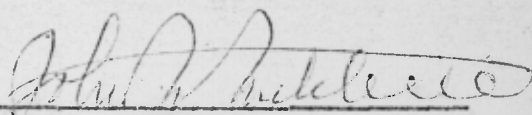
(c) Representing to any person because of race, color, religion, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available,

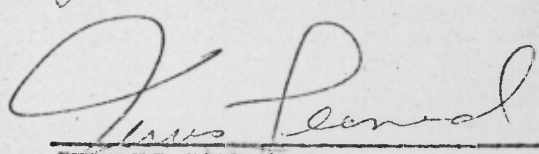
(d) Making or causing to be made any statement with respect to the sale or rental of a dwelling that indicates any preference, limitation or discrimination based on race, color, religion or national origin, and

(e) Failing or refusing to take adequate affirmative steps to correct the effects of defendants' past and present discriminatory practices including but not limited to informing the general public that defendants' policy shall be to provide fair housing regardless of race, color, religion, or national origin.

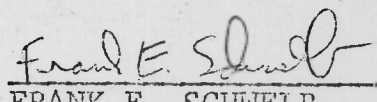


Plaintiff further prays for such other and further relief as the interests of justice may require together with the costs and disbursements of this action.

  
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STEPHEN H. SACHS  
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