

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS

FORT WORTH DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.
v.)	
)	<u>COMPLAINT</u>
MORRIS GREEN)	
)	
Defendant.)	
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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.

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

3. The defendant, who resides in the Northern District of Texas, owns and operates a six-unit apartment building, located at 704 North Oak Street, Mineral Wells, Texas. This building is a dwelling within the meaning of 42 U.S.C. 3602.

4. The defendant operates the property described in paragraph 3 of the complaint on a racially discriminatory basis. Pursuant to this racially discriminatory policy, the defendant refuses to rent apartments to Negroes solely because of their race; represents to Negroes, on account of their race, that no apartments are available when in fact apartments are available; and makes statements with respect to the rental of dwellings which indicate a preference based on race.

5. 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.

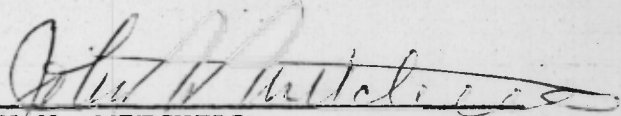
WHEREFORE, the plaintiff prays that the Court enter an Order enjoining the defendant, his employees, agents and successors, and all those acting in concert or participation with any of them, from

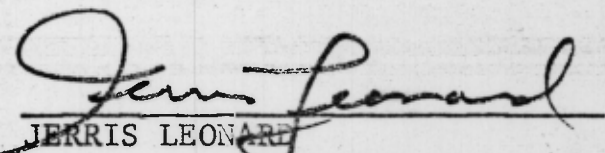
(a) Discriminating in any manner against any person on account of race with respect to the sale or rental of any dwelling or any of the terms or conditions of the sale or rental of any dwelling;

(b) Making any statements with respect to the sale or rental of any dwelling which indicate any preference, limitation or discrimination based on race; and

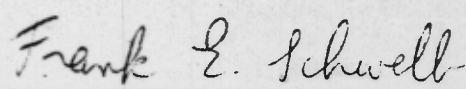
(c) Failing or refusing to take adequate affirmative steps to correct the effects of the defendant's past discriminatory practices, including, but not limited to, informing the general public that the defendant's policy shall be to provide fair housing opportunities regardless of race.

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


JOHN N. MITCHELL
Attorney General


JERRIS LEONARD
Assistant Attorney General

ELDON B. MAHON
United States Attorney


FRANK E. SCHWELB
Attorney
Department of Justice