

3. The defendant Scott Management Company is a partnership with its principal office in the District of Columbia. The defendants Robert S. Banks, William F. Banks, and William S. Banks are the members of the partnership. The partnership does business in Maryland.

4. The defendants William F. Banks and Philip Lustine own an apartment complex known as Oakcrest Towers, containing 832 units, located in Suitland, Prince Georges County, Maryland. The Oakcrest Towers complex is managed by the defendant Scott Management Company as agent for the aforesaid owners.

5. The defendants Robert S. Banks, William F. Banks, and Samuel Dweck own an apartment complex known as Southview Apartments, containing 1400 units, located in Oxon Hill, Prince Georges County, Maryland. Southview Apartments are managed by the defendant Scott Management Company as agent for the aforesaid owners.

6. The apartment complexes described in the preceding paragraphs above, are dwellings with the meaning of 42 U.S.C. 3602(b).

7. The defendants operate the apartment complexes described in the preceding paragraphs on a racially discriminatory basis. Specifically the defendants have discriminated against Negroes on account of their race and color, among other ways, as follows:

(a) The defendants have required Negroes to demonstrate higher financial or other qualifications in order to rent apartments than the qualifications which have been required of white applicants,

(b) The defendants have used more stringent procedures for processing applications by Negroes than for processing applications by white persons;

(c) The defendants have processed the applications of Negroes for rental of apartments less expeditiously than they have processed the applications of white persons,

(d) The defendants have, by various means, discouraged Negroes from applying for apartments, these means including representations that no apartments or only the highest priced apartments are available for rental, or that a substantial period of time is necessary for the approval of applications;

pl (e) The defendants have attempted to prevent the occupancy of apartments at the apartment complexes described in this complaint by interracial married couples and by single persons of different races residing together,

(f) The defendants have assigned and concentrated Negroes in certain areas of the apartment complexes because of race and color, and

(g) The defendants have made and caused to be made representations with respect to the rental of apartments at the complexes described in this complaint indicating a preference, limitation and discrimination based on race and color.

8. The defendants, by the acts and practices described in the preceding paragraphs, have made dwellings unavailable

to persons on account of race and color and have discriminated against persons in the terms, conditions and privileges of the rental of dwellings because of race and color.

9. Prior to 1968, Negroes were excluded on account of their race and color from the apartment complexes described in this complaint, in violation of 42 U.S.C. 1982. Defendants have failed to take adequate steps to correct the effects of their racially discriminatory practices both prior to and following the effective date of the Civil Rights Act of 1968.

10. 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 that the Court enter an Order enjoining the defendants, their employees, agents, and successors, and all those acting in active concert and participation with any of them, from:

(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

(f) Failing or refusing to take adequate affirmative steps to correct the effects of defendants' past discriminatory practices, including but not limited to informing the general public and other persons affected that the defendants' policy shall be to provide fair housing opportunities regardless

of race, color, religion or national origin and informing all applicants for apartments at each of the apartment complexes managed by the defendants of the availability of apartments at all of the apartment complexes managed by the defendants

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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