

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

SELMA S. BUYCKS-ROBERSON;
CALVIN R. ROBERSON; and RENE
BROOKS, on behalf of themselves
and others similarly situated,

Plaintiffs,

v.

CITIBANK FEDERAL SAVINGS BANK,

Defendant.

~~DEC 30 1994~~

JAN 12 1995

No. 94 C

H. Stuart Cunningham, Clerk
United States District Court

Judge Castillo

Magistrate Judge Lefkow

DOCKETED

JAN 13 1995

NOTICE OF FILING

To: Alan N. Salpeter, Esq.
Robert J. Kriss, Esq.
Mary Ann Spiegel, Esq.
Mayer Brown & Platt
190 South LaSalle Street
Chicago, Illinois 60603

PLEASE TAKE NOTICE that on Thursday, December 29, 1994, we shall file with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, Plaintiffs' **First Amended Complaint**, a copy of which is herewith served upon you.

Hilary Alexis
One of the Attorneys for the
Plaintiff

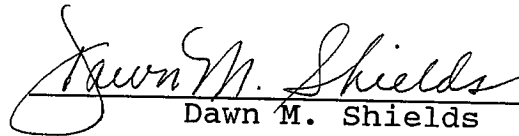
Fay Clayton, Esq.
Hilary I. Alexis, Esq.
ROBINSON CURLEY & CLAYTON, P.C.
300 South Wacker Drive
Suite 1700
Chicago, Illinois 60606
(312) 663-3100

CERTIFICATE OF SERVICE

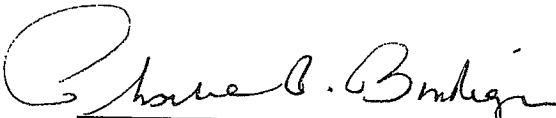
I, Dawn M. Shields, certify that I shall cause to be served a copy of Plaintiffs' **First Amended Complaint** upon the following party, via First Class Mail, messenger delivery, Federal Express, or telefax, as indicated, this 30th day of December, 1994:

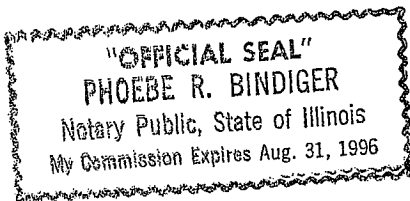
- First Class Mail
- Messenger Delivery
- Federal Express
- Telefax Delivery

Alan N. Salpeter, Esq.
Robert J. Kriss, Esq.
Mary Ann Spiegel, Esq.
Mayer Brown & Platt
190 South LaSalle Street
Chicago, Illinois 60603
(312) 701-7711 -- Telefax No.


Dawn M. Shields

Subscribed and sworn to
before me this 30th day
of December, 1994


Notary Public



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

~~DEC 30 1994~~
JAN 12 1995

H. Stuart Cunningham, Clerk
United States District Court

SELMA S. BUYCKS-ROBERSON;
CALVIN R. ROBERSON; and RENE
BROOKS, on behalf of themselves
and others similarly situated,

Plaintiffs,

v.

CITIBANK FEDERAL SAVINGS BANK,

Defendant.

No. 94 C 4094

Judge Costillo

Magistrate Judge Lefkow

FIRST AMENDED COMPLAINT

DOCKETED

Plaintiffs Selma S. Buycks-Roberson, Calvin R. Roberson and Rene Brooks, on behalf of themselves and others similarly situated, by and through their attorneys, make this First Amended Complaint against Defendant, Citibank Federal Savings Bank ("Citibank").

NATURE OF THE ACTION

1. This is a civil action brought by Selma S. Buycks-Roberson, Calvin R. Roberson and Rene Brooks on behalf of themselves and all other African-Americans who made home loan applications to Citibank, and whose applications were rejected because of their race or color, or because of the racial composition of the neighborhood in which their properties were located. This action seeks injunctive relief and monetary damages for violations of 42 U.S.C. §§ 1981 and 1982; 42 U.S.C. § 3605 and 15 U.S.C. § 1691(a).

JURISDICTION AND VENUE

2. Jurisdiction of this Court arises under 28 U.S.C. § 1343(a)(4), 42 U.S.C. § 3613(a)(1)(A) and 15 U.S.C. § 1691e(f).

3. Venue is proper in the Northern District of Illinois since some of the acts and transactions complained of occurred in this district.

THE PARTIES

4. Plaintiff Selma S. Buycks-Roberson is an African-American citizen of the United States who resides in Broadview, Illinois.

5. Plaintiff Calvin R. Roberson is an African-American citizen of the United States who resides in Chicago, Illinois.

6. Plaintiff Rene Brooks is an African-American citizen of the United States who resides in Chicago, Illinois.

7. Defendant Citibank is a corporation that offers real estate mortgage loans, home improvement loans and home equity loans ("home loans").

CLASS ACTIONS ALLEGATIONS

8. (a) Plaintiffs are Citibank home loan applicants; they bring this action on behalf of themselves and all other African-American home loan applicants similarly situated. This action is brought as a class action pursuant to Rule 23(b)(2) and Rule 23(b)(3) of the Federal Rules of Civil Procedure.

(b) The class consists of all African-Americans who made applications for home loans to Defendant within two years of the filing of this Complaint, and whose applications were

