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CLERK
UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 FRED C. TRUMP, DONALD TRUMP)
 and TRUMP MANAGEMENT INC.,)
)
 Defendants.)
 _____)

730 1529

CIVIL ACTION NO. _____

COMPLAINT FOR INJUNCTION
PURSUANT TO FAIR HOUSING
ACT OF 1968, 42 U.S.C.
3601, et seq.

The United States of America alleges:

1. This is an action brought pursuant to 42 U.S.C. 3613 seeking to remedy violations of the Fair Housing Act, 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. Defendant Trump Management Inc., which is a New York corporation, doing business in the Eastern District of New York, manages and operates numerous apartment buildings, totalling at least 14,000 dwelling units in the New York area and elsewhere. Defendant Fred C. Trump is the principal stockholder and Chairman of the Board of Directors of Trump Management Inc. Defendant Donald Trump is president of Trump Management Inc. The defendants Fred C. Trump and Donald Trump transact business in New York and are responsible for the policies and practices of Trump Management Inc.

4. The apartment buildings and complexes managed by Trump Management Inc. are dwellings within the meaning of 42 U.S.C. 3602(b).

5. The defendants, through the actions of their agents and employees, have discriminated against persons because of race in the operation of their apartment buildings, among other ways, by:

(a) Refusing to rent dwellings and negotiate for the rental of dwellings with persons because of race and color, in violation of Section 804(a) of the Fair Housing Act of 1968, 42 U.S.C. 3604(a).

(b) Requiring different terms and conditions with respect to the rental of dwellings because of race and color, in violation of Section 804(b) of the Fair Housing Act of 1968, 42 U.S.C. 3604(b).

(c) Making and causing to be made statements with respect to the rental of dwellings which indicate a preference, limitation and discrimination based on race and color in violation of Section 804(c) of the Fair Housing Act of 1968, 42 U.S.C. 3604(c).

(d) Representing to persons because of race and color that dwellings are not available for inspection and rental when such dwellings are in fact so available, in violation of Section 804(d) of the Fair Housing Act of 1968, 42 U.S.C. 3604(d).

6. The defendants' conduct described in the preceding paragraph constitutes:

(a) A pattern and practice of resistance by the defendants to the full enjoyment of rights secured by Title VIII of the Fair Housing Act of 1968, 42 U.S.C. 3601 et seq; and

(b) A denial to groups of persons of rights granted by Title VIII of the Fair Housing Act of 1968, 42 U.S.C. 3601 et seq., which denial raises an issue of general public importance.


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

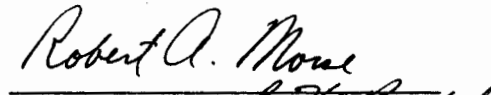
(a) Discriminating against any person on the basis of race, color, religion or national origin, with respect to any right secured by the Fair Housing Act of 1968, 42 U.S.C. 3601 et seq.

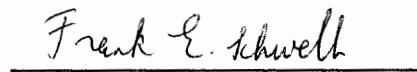
(b) Failing or refusing to take adequate affirmative steps to correct the effects of their past discriminatory policies and practices. Plaintiff further prays for such


additional relief as the interests of justice
may require, together with the costs and dis-
bursements of this action.


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