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

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U. S. DISTRICT COURT E.D. N.Y.
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TIME A.M. _____
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UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
TRUMP MANAGEMENT, INC.,)
)
Defendant.)

CIVIL ACTION NO. 73 C 1529
MOTION FOR SUPPLEMENTAL RELIEF

The United States of America, plaintiff herein, respectfully moves this Court for an Order granting supplemental relief against the defendant Trump Management, Inc. (hereinafter sometimes referred to as Trump). In support of its motion, the United States alleges:

1. On October 15, 1973, the United States filed its complaint in this action, alleging violations of the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3601 et seq., and prayed that the Court enter an Order enjoining the defendant from future violations of Title VIII, and directing it to take such affirmative steps as might be necessary to correct the effects of its past discriminatory practices.

2. On June 10, 1975, this Court entered an Order, by consent of the parties, permanently enjoining Trump and those in privity with it from engaging in any discriminatory practices prohibited by the Fair Housing Act. The defendant was also ordered to implement an affirmative program to promote equal housing opportunity. The principal officers of Trump Management, Inc. were ordered to acquaint themselves personally and in detail with Trump's obligations under the Order and the various fair housing laws, and to assure themselves that their subordinates similarly understood their responsibilities.

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3. Trump and its officers and agents have failed to comply fully with this Court's Order of June 10, 1975. Specifically, they have

- (a) Made apartments unavailable to black persons on account of race;
- (b) Discriminated against black persons in the terms and conditions of rental of a dwelling on account of race;
- (c) Made statements with respect to the rental of dwellings that indicate a preference, limitation, and discrimination based on race; and
- (d) Represented to black persons because of race that dwellings were not available for inspection and rental when such dwellings were in fact so available;

in violation of paragraphs 1, 2, 3 and 4 of Part II of this Court's Order.

4. In conformity with Part IX of this Court's Order, plaintiff has notified Trump of complaints which have come to its attention and has given Trump a reasonable opportunity to correct the violations. While Trump has, in some instances, accommodated the needs of individual complainants, it has not taken adequate action to prevent future violations, and racially discriminatory conduct by Trump agents has occurred with such frequency that it has created a substantial impediment to the full enjoyment of equal opportunity.

5. Further relief, including additional affirmative action and a substantial extension of the decree, is necessary in order to ensure nondiscrimination in the future and to correct the effects of past noncompliance.

WHEREFORE, the United States prays that, upon a hearing, this Court order

1. that the injunction in this case be extended for such period of time as may be needed to ensure the full enjoyment of equal housing opportunity;

2. that additional affirmative relief be granted to ensure realistic opportunity to nonwhite citizens to rent dwellings at predominantly white buildings, including provisions such as those contained in Part IV of this Court's prior Order, as well as additional steps designed to provide a free and informed residential choice for all persons without regard to race, color, religion, or national origin;

3. that individual victims of discrimination be compensated for any injury caused by unlawful conduct on the part of Trump or its agents; and

4. that Trump be required to continue to report to the Court and to the United States.

Plaintiff further prays for such other and further relief as this Court may deem just and proper, including the costs and disbursements of this proceeding, including reasonable counsel fees.

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