

November 3, 1975

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To: Files

From: (b)(7)(C)

Subject: United States v. Trump Mgt.

On September 24, 1975, we received the initial compliance report from Trump Mgt. in accordance with the Consent Order filed on June 10, 1975. My analysis of this report has revealed that the defendant has not fully complied with several of the provisions outlined in the decree.

Specifically, Section 6, d.3 of the Consent Order requires the defendant to forward to this Department a report showing the name, race and position of each employee. Additionally, this report was to include the building to which the employees are assigned and copies of their signed statements. The material submitted corresponding to this provision included a list containing the name, race and position of their employees. The list revealed that 90 white persons are employed by the defendant. The majority of these employees are ^{superintendents} superintendents. A list showing the number of employees in the various positions is attached as Exhibit A.

With respect to the employees we also received signed statements from 50 employees. Of these statements 40 indicated the building to which the persons were assigned. The defendant therefore failed to forward signed statements for at least half of his staff and failed to inform us of the buildings at which half his staff was employed.

LOS
7/20/72
175-52-28

1 The second violation concerns Section 6 d requiring
2 the defendant to forward to us the current ~~statistics with~~
3 racial statistics of the tenants in each of the buildings
4 owned or managed by the defendant. In response to this
5 provision the defendant forwarded a list entitled "Racial
6 Census Report" that included the names of all his buildings
7 and two columns showing the dates 7/1/75 and 9/1/75. Under
8 these categories opposite each building the defendant indi-
9 cated a numerical figure. From the manner in which this
10 report was prepared I can assume that the figures represent
11 the current number of black tenants as of July and September,
12 1975. If my assumption is accurate the defendant failed to
13 include the current statistics for white tenants residing
14 in his apartment complexes.

15 The third violation concerns the advertising provision.
16 Under this provision the defendant was required to include
17 the slogan "Equal Housing Opportunity" in all its advertisements.
18 Additionally, the defendant was required to place a monthly
19 15 line display ad in the Amsterdam News, a black oriented
20 newspaper and El Diario, a Spanish oriented newspaper.

21 The defendants newspaper advertisements placed in the
22 minority papers contained a cross-section of Trump's buildings
23 as required by the Decree. However, an advertisement placed
24 in each of these papers failed to meet the length requirement
25 as pointed out in the decree. Specifically, an ad placed in
26 the Amsterdam News on August 6, 1975 was 9 lines and an ad
27 in the El Diario on August 29, 1975 was 10 lines.

1 The advertising provision also requires the defendant
2 to place an advertisement at least 3 inches in length in the
3 New York Times one Sunday every month. This provision
4 further indicated that the Equal Housing Opportunity slogan
5 shall be in prominent capital letters. We received a copy
6 of a newspaper advertisement that appeared in the N.Y. Times
7 on Sunday July 27, 1975. The following analysis of this
8 advertisement is based solely on my assumption that the
9 ad corresponds with the above-mentioned requirement.

10 First, the ad was less than 3 inches in length. Secondly,
11 the ad contained information for Patio Gardens, a predominantly
12 black building and Shore Haven; a relatively all-white building.
13 The EHO slogan immediately following Patio Gardens was in
14 large black capital letters while the EHO slogan following
15 Shore Haven was in very small capital letters. In view of
16 the lettering discrepancy this particular advertisement
17 could possibly indicate a signal to prospective black applicants.
18 If the purpose of the ad was not to indicate a signal the ad
19 is still not correct since the slogan was not placed at the
20 bottom in all capital letters.

21 An advertisement placed in the New York Times on
22 Saturday August 30, 1975 approximately 3 1/2 inches and showing
23 a cross section of the defendant's buildings included a EHO
24 slogan. However, in my opinion the slogan was not prominent.

*Letter to Mr. A. A. [unclear] dated 10/17/75
Rec'd at [unclear]*

1 The fourth violation concerns the submission of
2 information in 8 categories pertaining to inquirers.
3 A form was prepared and attached to the Consent Decree
4 including the following categories to be reported on *for*
5 each inquirer by race: (1) made inquiry; (2) were offered
6 an application (3) filled out an application (4) submitted
7 deposit with application (5) were accepted for occupancy
8 (6) were rejected (7) withdrew application and (8) had
9 application pending at the end of the reporting period.

10 For each of the 15 buildings listed in the decree
11 the defendant submitted his report pertaining to inquirers.
12 However, the report failed to include the information for
13 numbers 5 through 8 above.

14 The fifth violation concerns vacancies. We received
15 the defendant's list of vacancies as required by the Consent
16 Decree. However, the decree states that the defendant shall
17 indicate on the list where appropriate the dates the Open
18 Housing Center was contacted concerning these vacancies. The
19 defendant's list did not include this information. *In addition, to indicate where
apartment located*

20 With respect to the provision of the decree concerning
21 notifying various organizations the defendant is in semi-
22 compliance. Specifically, the decree requires the defendant
23 to notify apartment locators, credit checking companies,
24 referral agencies, Fair Housing groups and labor unions.
25 We received a copy of the letter sent to 5 labor unions.
26 We also received copies of the letters sent to the Open
27 Housing Center, Shanton Realty Corp and Kraham Realty Corp. ¹¹
28 advising of their non-discriminatory policy. With respect
29

30 ^{- 4 -}
*11 A brief summary of the letters forwarded is
attached as Exhibit B.*

1 to the letters forwarded to the realty corporations I do
2 not know if these corporations are the apartment locators,
3 referral agencies, credit checking companies or management
4 companies. In view of this I am unable to determine
5 if the defendant has fully complied with this provision.

6 The decree requires the defendant to forward a report
7 reflecting applications for tenancy at each building.
8 In accordance with this provision we received all the
9 required information. A report showing the number of persons
10 who were accepted or rejected at each of the buildings and
11 information pertaining to inquirers is attached as Exhibits
12 C & D. The report reveals that the majority of persons
13 submitting a deposit with their applications secured apartments.
14 Specifically, 26 black persons submitted deposits and 24 were
15 accepted; 96 white persons submitted deposits and 92 secured
16 apartments; 16 other minorities submitted applications and 12
17 secured apartments.

18 The report further reveals that approximately the same
19 percentage of black and white persons making inquiries actually
20 receive apartments. Specifically, 360 white persons made
21 inquiries and 92 of these persons or 25.5% were accepted;
22 104 black persons made inquiries and 24 of these persons
23 or 23.07% were accepted. With respect to the other
24 minorities 30 made inquiries and 12 or 40% were accepted.

1 In view of the information pertaining to applications
2 it appears that the defendant is in compliance with the
3 spirit of the decree. (I find this hard to believe.)
4 I therefore plan to write the defendant a letter
5 advising of the technical deficiencies of the decree.

6 I have read your memos advising of the recent complaints
7 from prospective black applicants. However, the vacancies
8 these persons refer to do not appear on the defendants'
9 list of vacancies. In view of this, I will investigate the
10 matter further to determine if the defendant is providing us
11 with all the required information. I will also try to determine
12 if these black persons believed there were vacancies when in
13 fact no vacancies existed.

14 Regardless of my findings I think we should conduct a
15 records inspection in the near future but not during the winter.