

FBI

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Via Airtel

(Priority)

TO: SAC, New York (177-69)

1/31/74
(Date)

From: Director, FBI (177-1859)

TRUMP MANAGEMENT CORPORATION
NEW YORK, NEW YORK

[Redacted] - VICTIM
[Redacted] - VICTIM

DIH
OO: NY

Rerep of SA [Redacted] New York, 11/30/73.

Enclosed are two copies of a self-explanatory Departmental letter dated 1/30/74.

Complete the requested investigation in accordance with the provisions of Section 137, Volume IV, Manual of Instructions, and surep ~~within~~ by ~~days of the receipt of this communication~~ close of business, 2/19/74.

State in the first paragraph of the details of your report that it contains the results of a limited investigation and underscore the word limited preliminary

Advise all persons interviewed appropriate officials at the outset that this investigation is being conducted at the specific request of the U. S. Department of Justice.

Remarks: Concerning page 5, paragraph 2, of Departmental request, you are instructed to limit information informally furnished to the USA or Departmental Attorneys to present whereabouts of witnesses. Confirm in writing any information furnished and advise the Bureau. Any information of a substantive nature should be furnished to USA or Departmental Attorneys in finished form (FD-302). Advise the Bureau of such information furnished.

Enc. (2)

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ATTACHMENT A

1. Interview the complainant, if other than the victim, for full details of his complaint, including the names of the subject, victim and any others with knowledge of the alleged discriminatory acts.

2. Interview the victim to obtain the following information:

(a) Please obtain full background information, including his address, telephone number at home and at work, age, race, religion or national origin (as relevant to his allegations), his occupation, place of employment, length of time employed, family income, educational background, marital status and size of family living at home, and such other background data as may appear to be pertinent.

(b) Obtain full details of all dealings the victim has had with the subject or any of his agents, including all oral or written communications with these persons, the date and time such communications were made, the nature of the alleged discriminatory act, the names and addresses of the persons who were involved, and the victim's description of what was said or done.

(c) If the allegation relates to discrimination in the terms of rentals, i.e., if black persons claim they were quoted higher rates than are quoted to white persons for a similar unit, ascertain the rental rates and the amount of the security deposit quoted to the

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interviewee and determine why the interviewee believes the rates to be discriminatory; also, please determine the number of bedrooms requested, size of apartment shown to interviewee, location of apartment shown (ground floor or above), and whether the unit contains a balcony, patio, fireplace or other feature (such as utilities furnished by the management) which would affect the rental rate.

(d) Determine from the victim the reason or reasons the subject or his agents gave for refusing to rent or deal with him.

(e) Ascertain the names and addresses of any witnesses to the incident.

(f) Obtain copies of any pertinent written materials or documents that the victim may have in his possession, such as copies of application forms for the subject housing, copies of purchase agreements or applications for financing, advertising materials dealing with the subject housing, or correspondence between the subject and the victim.

3. Obtain details of any complaint made by the complainant or victim with any local, state or federal agency concerning the same incident of housing discrimination. From the specific agency involved,

please secure copies of any complaints about any building or complex, etc., owned or managed by the subject, as well as the names of all obvious victims and complainants and the results of that agency's investigation and action taken on each complaint.

4. Please interview the owner, resident manager or other appropriate representative of the owner to secure his version of the facts resulting in the complaint, and to obtain the following additional information:

(a) Please determine the name, address, race and position or function of every person and organization having an ownership interest in, or participating in the management of, the building or complex in question.

(b) Determine the name, address, number of units, age and type of buildings, and number of tenants by race (including the date the first non-white moved in) of every residential building or apartment complex owned by the owners or any of them, or managed by the managers or any of them.

(c) Please determine the number of tenants by race at the subject building or complex, and the name and address (dwelling or apartment number, etc.) of each non-white tenant. Also, ascertain the range of rent for each type of unit, including information as to whether the rental rate is affected by features such as patio, balcony, location (ground floor or above), and all other factors which would determine the rental rate.

(d) If a trailer park is involved, also ascertain the total number of spaces, the number of units owned by the subject and the tenants. Ascertain the conditions of occupancy (utilities, lease, rent, race, number of occupants, etc.), race of tenants, and address of each non-white tenant.

(e) Please determine the name, race, address, date of application and action taken in the applications of the last twenty applicants for a dwelling at the subject building, complex, etc. Please also secure the name, race, and address of every non-white applicant for the past two years (or of the last twenty black applicants, if there have been so many during a shorter period).

(f) Ascertain the number and type of vacant dwellings that were available at the time of the incident involved, the average number of vacancies per month and the duration of such vacancies.

(g) Please ascertain the rents charged at the complex where the incident occurred for each type of apartment, features which affect the rental rate, the approximate rate of turnover, and the approximate number of applicants, by race, per year. If there are no black or other minority tenants or very few, determine why the interviewee believes this to be so.

(h) Ascertain whether and the degree to which management acquires new tenants through the recommendation and recruitment by existing tenants and through the acceptance of walk-in applicants for apartments, and full details as to the existence or nonexistence of such policy.

(i) Please determine if instructions were given to resident managers when the managers were hired regarding the rental of dwellings or spaces to blacks or other minority members; whether any changes occurred in these instructions, and if so, when; if the interviewee was ever advised by a manager of black applicants or of blacks who inquired, and if so, determine how the situation was handled and the results of the applications or inquiries. Also, ascertain whether interviewee has a specific policy concerning renting to blacks or other minority members, and, if so, ascertain the details of the policy and if it has changed, when and why the change was made.

(j) Please ascertain all criteria and qualifications prospective tenants must meet (credit rating, salary, marital status, race, children, deposit, written application, and the like), and a complete description of all procedures for becoming a tenant, including all steps from initial inquiry to moving in. Determine if the manager's subjective impression of the applicant plays any part in the decision to rent an apartment. If so, please determine specifics. (For example, are

managers free to accept or reject applicants because of hair styles, neatness, age or type of car, etc.)

(k) Ascertain whether any racial or other codes, such as a small "c"*/ or "XX"*/ or other mark, appears on the application sheet or card to designate the race of the applicant. If so, inspect as many of the records as possible and obtain copies of a representative number.

(l) If a credit, employment, prior landlord, or other check is or has been in use, please obtain full details as to what check is made, whether check is made for all applicants or merely some and whether the same check is made as to all applicants. If a check is conducted in some but not all cases, or if a different check is conducted in some cases then in others, please determine all criteria on which the decision as to what, if any, check should be made. Please determine what check was made for the last ten black applicants and the last ten white applicants who reached this stage in their application. If a form is used for the various types of checks, please obtain copies of each.

*/ Often used for "colored."

**/ XX has often been used in the industry as a symbol for blacks.

(m) If the subject advertises, please secure details of the media used and copies of representative advertisements. If possible, obtain the entire page of the publication in which a written advertisement appears. If different media are used for different properties, please determine which properties are advertised in which media, and the general racial characteristics of the properties so advertised and of the neighborhood in which they are located (white, black, transitional, etc.). Determine whether the rental or other property is listed with any rental agency, brokerage firm or multiple listing service, and, if so, obtain the name, and address of such agency, firm or service.

(n) Please ascertain the number of employees by race and job position at each building or complex and identify any maintenance or other personnel who reside in the building.

(o) From personal observation and from interviews with the owner and the manager, ascertain whether a fair housing poster, which is required by the Department of Housing and Urban Development, is displayed in each rental office of the subject.

5. Please interview all persons who witnessed any dealings or conversations (which are the subject of this investigation) between the victim and the subject to obtain information similar to that requested to be obtained from the victim in Part 2 of this memorandum.

6. Please secure responsive interviews from five former employees and at least five present employees of the subject (giving preference to those who had rental or employment responsibilities, and including some non-white employees if possible) to obtain the following information:

(a) Determine how the apartments are advertised and how vacancies are made known to potential tenants. For example, are present tenants encouraged to locate or recommend potential tenants, are newspaper advertisements used, and if so, when, etc. Determine what proportion of applicants are referred by present tenants and whether such applicants are given any kind of preference.

(b) Determine the normal procedure followed from the time a potential tenant first contacts the rental agent or manager until the time the person is either rented an apartment or not rented an apartment. This should include the use of application forms, credit checks, necessity for references, procedures for verification of income or employment, etc.

(c) Determine the criteria used by a rental agent or manager in deciding whether to rent to a particular applicant. For example, is the manager given any discretion in the selection of tenants; if so, how is it used and is it reviewed by the owner. Obtain copies of any written or published criteria.

(d) Ascertain the extent to which the manager or the rental agent was instructed about the rental of apartments by the owner. If any of the instructions were in writing, obtain copies.

(e) Determine whether the owner instructed or discussed with him the effect of the federal Civil Rights Act of 1968 or of any state or local fair housing act or regulation on the operation of the apartments. If so, please obtain details and the dates of such events. If exact dates are not known, please determine if such instructions or discussions occurred at about the same time as the passage of the acts.

(f) For those managers or rental agents who were employed by any of the subjects at the time of the passage of the 1968 Act (April 1968), or its general effective date (January 1, 1969), or at the time of the passage or effective date of a state or local Fair Housing Act, please determine the effect of such legislation on the operation or management of the apartments and the extent of any discussions with the owners concerning the changes.

(g) Please determine whether the interviewee is aware of any policy or procedure followed in the taking and processing of applications from, or rental of apartments to black persons

which was different from that used in the case of others. This includes any statements or instructions the interviewee received in this regard, even though a particular interviewee did not necessarily follow those instructions. Also, determine if the interviewee is aware of any limitations on the use of facilities (pool, recreation areas, etc.) that may be imposed on black tenants or if there is any limitation on white tenants having black guests, etc.

(h) Please determine whether a credit check is conducted in the case of each applicant, whether the same procedures are used in each case, and by whom the check is conducted. If a check is not always made, or if different procedures are followed, please determine what criteria are used to decide how a particular applicant will be checked. Determine how many of the last 20 black applicants and how many of the last 20 white applicants were subjected to a full credit check.

(i) Please determine if the interviewee is aware of the identity of any black applicants who inquired about or applied for rental and if so, whether such applicants obtained an apartment. If they were not rented an apartment, obtain the reasons for not renting. Also, please obtain the names and addresses of all such persons (both successful and unsuccessful applicants) known to the interviewees, determine the number of units in

each apartment managed by each interviewee and ascertain the highest number of apartments rented to blacks at any one time at each such apartment complex.

(j) Determine if the apartment rental office contains or has contained a sign or notice which indicated the existence of a policy of renting to persons without regard to race or color and if, in any way, the existence of such policy was known to the community.

7. Please secure responsive interviews from at least five black tenants of the trailer park, apartment building or complex in question (if there are so many) and from at least five rejected black applicants as to all of their dealings with the subject. Please include the following information: (

(a) Ascertain how the interviewee learned of the subject dwellings and why he decided to apply or inquire at the subject dwellings.

(b) Determine how many times he went to the rental office, what was said, the manner in which he was received and the attitude, name and position of the person with whom he spoke.

(c) Determine if, in fact, the interviewee knew of a vacancy, and if so, the basis of that knowledge.

(d) Ascertain the type of information requested or sought by the persons in the office, such as credit references, names of employers, former addresses, etc.

(e) Determine the reason given to the applicant why he was not rented a dwelling, or if he was rented a dwelling, ascertain the length of the waiting period.

(f) Determine if the interviewee threatened to complain, or did complain, to a fair housing group, a lawyer, or a governmental agency because of any aspect of his dealings with the subject. If so, obtain details.

8. Please secure responsive interviews with ten present white tenants for the following information:

(a) Please obtain the information requested in Part 7, above.

(b) Please determine their understanding of the subject's policy or practice with regard to the rental of apartments to black persons or to other minority persons. If they have an understanding of the policy or practice, please determine the factual basis for it.

(c) Please determine if the interviewee is aware of any instance when a black or other minority person was not rented an apartment and the reasons for the failure to rent, if known.

(d) Determine if interviewee has ever been advised by a representative of the subject about any rules which may pertain to entertaining black guests in the apartments, black guests using the pool or other recreational facilities, or any other matter which may indicate a policy or practice based on race or color.

(e) Please determine whether the interviewee was told that blacks or other minority persons were not rented apartments there, kept out, etc. If so, secure details concerning those who were present, the dates, exactly what was said, and whether such conversation occurred when the interviewee was seeking an apartment at the subject building or complex, or after he moved in.