

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID M. PEEBLE, d/b/a
SUNRISE GARDENS APARTMENTS,
325 Marcy Avenue, Oxon Hill, Maryland
Defendant.

CIVIL ACTION

NO. 21388

COMPLAINT

U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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The United States of America alleges:

1. This is an action brought by the United States pursuant to 42 U.S.C. 3613 seeking relief for violations of 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. The defendant, David M. Peeble, is a resident of Prince Georges County in the State of Maryland.

4. The defendant owns and operates an apartment building known as Sunrise Gardens Apartments, containing approximately 88 units, located at 325 Marcy Avenue, Oxon Hill, Prince Georges County, Maryland. There are no Negro tenants at the Sunrise Gardens Apartments.

5. The apartment building described in paragraph 4 is a dwelling within the meaning of 42 U.S.C. 3602(b).

6. The defendant operates the apartment building described in paragraph 4 on a racially discriminatory basis. Specifically the defendant has discriminated against Negroes on account of their race and color, among other ways, as follows:

(a) The defendant has refused to negotiate with persons for the rental of apartment units because of race or color;

(b) The defendant has made statements with respect to the rental of apartment units indicating preferences and limitations based on race or color and indicating an intention to discriminate on the basis of race or color.

7. The defendant, by the acts and practices described in the preceding paragraphs, has made dwellings unavailable to persons because of race and color.

8. The conduct described in the preceding paragraphs constitutes a pattern and practice of resistance to the full enjoyment of rights secured by Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3601 et seq.

WHEREFORE the plaintiff prays that the Court enter an order enjoining the defendant, his employees, agents, and successors, and all those acting in active concert and participation with any of them, from:

(a) Failing or refusing to make any dwelling available to any person because of race, color, religion, or national origin;

(b) Discriminating against any person in the terms, conditions, or privileges of rental of any dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, or national origin;

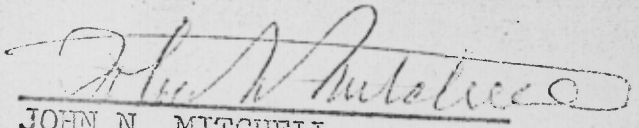
(c) Representing to any person because of race, color, religion, or national origin that any dwelling is not available for inspection or rental when such dwelling is in fact so available;

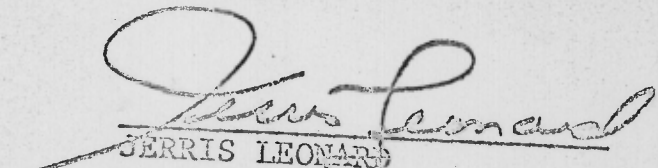
(d) Making or causing to be made any statement with respect to the rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, or national origin; and

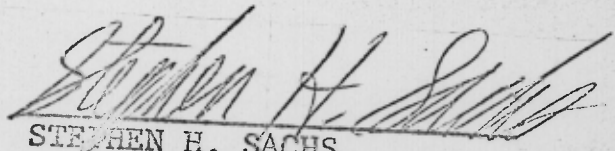
(e) Failing or refusing to take adequate affirmative steps to correct the effects of defendant's past discriminatory practices, including but not limited to informing the general public and other persons affected that the defendant's policy shall be to provide fair housing opportunities regardless of race, color, religion, or national origin.

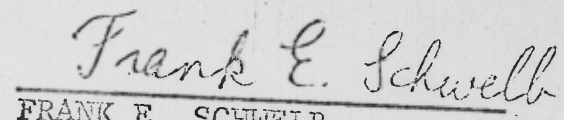
Plaintiff further prays for such additional relief as the interests of justice may require, together

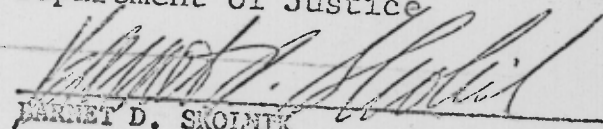
with the costs and disbursements of this action.


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