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13 UNITED STATES DISTRICT COURT  
14 EASTERN DISTRICT OF CALIFORNIA  
15 FRESNO DIVISION

16 UNITED STATES OF AMERICA, )  
17 )  
18 Plaintiff, )  
19 )  
20 v. ) CIVIL ACTION NO. \_\_\_\_\_  
21 )  
22 RAWLAND LEON SORENSEN, )  
23 )  
24 Defendant. )  
25 )

23 **COMPLAINT AND DEMAND FOR JURY TRIAL**

24 The United States alleges as follows:

25 **JURISDICTION AND VENUE**

- 26  
27 1. This action is brought by the United States to enforce the Fair Housing Act, as amended  
28 (the Fair Housing Act), 42 U.S.C. §§ 3601–3631.

1 2. The Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and under 42 U.S.C.  
2 § 3614(a).

3  
4 3. Venue is proper in this district under 28 U.S.C. § 1391(b) because the defendant resides  
5 in the Eastern District of California and the events or omissions giving rise to the United  
6 States' claim occurred there.

7 **ALLEGATIONS**

8 4. Defendant Rawland Leon Sorensen (Leon Sorensen) is a resident of Bakersfield,  
9 California.

10  
11 5. Leon Sorensen has operated a residential rental business in Bakersfield, California for  
12 more than thirty years. Since 1999 and presently, Leon Sorensen owns over fifty  
13 residential rental properties located in Bakersfield (the subject properties). Most of the  
14 subject properties are single family homes, though some of the subject properties may  
15 contain more than one rental unit.

16  
17 6. At all times relevant to this action, Leon Sorensen controlled all aspects of the  
18 management of each subject property including, but not limited to, advertising vacancies,  
19 accepting or rejecting prospective tenants, setting rates for rent and security deposits,  
20 collecting rent, accepting requests for repairs, and evicting tenants.

21  
22 7. The subject properties are dwellings within the meaning of 42 U.S.C. § 3602(b).

23 8. From at least 2002 through the present, Leon Sorensen on multiple occasions subjected  
24 actual and prospective female tenants of the subject properties to discrimination on the  
25 basis of sex, including severe, pervasive, and unwelcome sexual harassment. Such  
26 conduct has included, but is not limited to:  
27  
28

- 1 a. Making unwelcome sexual advances and unwelcome sexual comments to female
- 2 tenants and prospective tenants;
- 3
- 4 b. Exposing his genitals to female tenants and prospective tenants;
- 5
- 6 c. Entering the residences of female tenants without permission or notice;
- 7
- 8 d. Groping or otherwise touching female tenants on their breasts and buttocks without
- 9 their consent;
- 10
- 11 e. Granting or offering to grant tangible housing benefits—such as reducing the rent,
- 12 overlooking or excusing late or unpaid rent, purchasing new appliances for the
- 13 rentals, and forestalling or terminating eviction proceedings—in exchange for sexual
- 14 favors;
- 15
- 16 f. Taking adverse housing actions against female tenants who have not granted or who
- 17 would not continue to grant the requested sexual favors, including evicting or
- 18 initiating eviction proceedings against such tenants.

19 9. By the actions and statements described above, Leon Sorensen has:

- 20 a. Denied housing or otherwise made a dwelling unavailable because of sex in violation
- 21 of 42 U.S.C. § 3604(a);
- 22
- 23 b. Discriminated in the terms, conditions, or privileges of rental of a dwelling, or in the
- 24 provision of services or facilities in connection therewith, because of sex, in violation
- 25 of 42 U.S.C. § 3604(b);
- 26
- 27 c. Made statements with respect to the rental of a dwelling that indicate a preference,
- 28 limitation, or discrimination based on sex, in violation of 42 U.S.C. § 3604(c); and

1 d. Coerced, intimidated, threatened, or interfered with a person in the exercise or  
2 enjoyment of, or on account of their having exercised or enjoyed, their rights granted  
3 or protected by Section 804 of the Fair Housing Act, in violation of 42 U.S.C. § 3617.  
4

5 10. The conduct of Leon Sorensen constitutes:

6 a. A pattern or practice of resistance to the full enjoyment of rights granted by the Fair  
7 Housing Act, 42 U.S.C. § 3601–3631; and

8 b. A denial to a group of persons of the rights granted by the Fair Housing Act, 42  
9 U.S.C. §§ 3601–3631, which denial raises an issue of general public importance.  
10

11 11. Female tenants, prospective tenants, and persons associated with them have been injured  
12 by Leon Sorensen’s discriminatory conduct. Such persons are aggrieved persons as  
13 defined in 42 U.S.C. § 3602(i) and have suffered damages as a result of Leon Sorensen’s  
14 conduct.  
15

16 12. Leon Sorensen’s conduct was intentional, willful, and/or taken in reckless disregard for  
17 the rights of others.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, the United States prays that the Court enter an ORDER that:

- 20 1. Declares that Leon Sorensen’s discriminatory practices violate the Fair Housing Act;  
21 2. Enjoins Leon Sorensen, his agents, employees, and successors, and all other persons in  
22 active concert or participation with him from:  
23 a. Discriminating on the basis of sex in any aspect of the rental or lease of a dwelling;  
24 b. Interfering with or threatening to take any action against any person engaged in the  
25 exercise or enjoyment of rights granted or protected by the Fair Housing Act; and  
26  
27  
28

1 c. Failing or refusing to take such affirmative steps as may be necessary to prevent the  
2 recurrence of any discriminatory conduct in the future and to eliminate, to the extent  
3 practicable, the effects of Leon Sorensen's unlawful practices;  
4

5 3. Awards monetary damages to each person aggrieved by Leon Sorensen's discriminatory  
6 housing practices for injuries caused by Leon Sorensen's discriminatory conduct,  
7 pursuant to 42 U.S.C. § 3614(d)(1)(B);

8 4. Assesses civil penalties against Leon Sorensen in order to vindicate the public interest,  
9 pursuant to 42 U.S.C. § 3614(d)(1)(C); and  
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11 5. Awards such additional relief as the interests of justice may require.  
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