

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA,)	
)	Civil Action No. 24-cv-1633
Plaintiff,)	
)	JUDGE
v.)	
)	MAGISTRATE
TOWN OF FRANKLINTON, LOUISIANA,)	
)	Jury Trial Demanded
Defendant.)	
<hr/>		

COMPLAINT

The United States of America (“United States”) alleges as follows:

I. INTRODUCTION

1. The United States brings this action against the Town of Franklinton (“Town” or “Franklinton”) to enforce the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended 42 U.S.C. §§ 3601-3631.

2. In 2019, housing developers Rosemark Real Estate, LLC and Keyridge Ventures, LLC (“Quail Run Developers”) approached the Town of Franklinton with a proposal to construct an affordable housing development, including twenty duplexes with community facilities, to be known as Quail Run. Quail Run, if built, would have served low-income renters at rental prices below market rate.

3. Franklinton is racially segregated, and Quail Run was proposed to be sited in a high-majority-white area of Franklinton.¹ Based on the demographics of income-eligible

¹ As used in this Complaint, a “high-majority-white” area is one where 80 to 100 percent of the residents are identified as non-Hispanic white by the United States Census Bureau (“Census Bureau”) and a “majority-white” area is one where more than 50 percent of the

residents in Franklinton, Black households would have been significantly more likely to qualify for housing at Quail Run than white households.

4. Quail Run Developers sought zoning approval from Franklinton to build Quail Run. The zoning request was permissible under the language of Franklinton’s zoning ordinance and the Franklinton zoning commission initially recommended approving zoning. But Franklinton officials reversed course and blocked zoning approval. Franklinton residents and officials knew prospective low-income tenants at Quail Run were likely to be Black and that the development would have been located in a majority-white part of town. Franklinton then obstructed, delayed, and ultimately denied the zoning for Quail Run without any valid basis. In doing so, Franklinton denied housing opportunity disproportionately needed by Black residents in the town and interfered with its residents’ right to equal housing opportunities and Quail Run Developers’ opportunity to provide housing.

5. Franklinton’s conduct had the intent and effect of discriminating against Black residents and perpetuating segregation. Franklinton engaged in a pattern or practice of unlawful discrimination and denied rights to a group of persons because of race and color in violation of the Fair Housing Act. To remedy this conduct, the United States seeks declaratory and injunctive relief, monetary damages, and civil penalties.

II. JURISDICTION AND VENUE

6. This Court has jurisdiction over this action under 28 U.S.C. §§ 1331, 1345, and 42 U.S.C. § 3614(a).

7. Venue is proper under 28 U.S.C. § 1391(b), because the events or omissions

residents are identified as non-Hispanic white. Similarly, a “majority-Black” area is one where more than 50 percent of the residents are identified as either “Black or African American” by the Census Bureau.

giving rise to the alleged claims occurred in the Eastern District of Louisiana and because the defendant and the property at issue are located there.

III. DEFENDANT

8. The Town of Franklinton is a Louisiana municipal corporation located in Washington Parish, within the Eastern District of Louisiana, and organized under the laws of the State of Louisiana.

9. The elected officials for the Town of Franklinton include a mayor and five-member Board of Aldermen, collectively the “City Council” as referenced by Franklinton’s Code of Ordinances.

10. By the authority granted it by the State of Louisiana, Franklinton exercises zoning authority over land within its borders. Franklinton’s zoning regulations are set forth in Ordinance No. 1005, Appendix A to the “Code of Ordinances of Franklinton, Louisiana” (hereafter “Zoning Ordinance”).

11. Franklinton’s Zoning Ordinance was first enacted in 1983 and the currently operative version of the Ordinance was last revised on February 15, 2008, and adopted by Franklinton on May 27, 2008.

12. Franklinton’s zoning map is “made a part of the [Zoning Ordinance]” by reference and was last amended February 15, 2008. Zoning Ordinance at n.1 and § 9. Franklinton’s zoning map is the “final authority as to the current zoning status of land, buildings, and other structures in the town.” *Id.* § 1.102.

13. The Zoning Ordinance divides Franklinton into multiple zoning districts and specifies permissible types of land use for each district as well as permissible special exception uses and prohibited land uses for each district.

14. Pursuant to Franklinton’s Code of Ordinances, zoning matters are heard by Franklinton’s Planning and Zoning Commission (“Zoning Commission”), which consists of seven commissioners appointed by the mayor with the approval of the Board of Aldermen.

15. The Zoning Commission reviews zoning requests, determines whether the requests comply with the Zoning Ordinance and the incorporated zoning map, and makes written recommendations to the Board of Aldermen.

16. The Zoning Commission formally acts through written recommendations to the Board of Aldermen.

17. The mayor of Franklinton has “superintending control of all offices and affairs of the municipality” and must “actively and vigilantly see that all the laws and ordinances are properly executed and enforced.” Franklinton, La. Charter § 5-B (1968). The mayor also presides over and sets the agenda for City Council meetings. *See id.* § 5-A.

18. In 2019, Mr. Richard Dillon was the Mayor of Franklinton.

19. The Franklinton Code Enforcement Officer (“Code Enforcer”) is an employee of Franklinton who reports directly to the mayor and whose duties include administering and enforcing Franklinton’s Zoning Ordinance, maintaining the zoning map, interfacing with residents about planning and zoning, and facilitating zoning requests for the Zoning Commission. The Code Enforcer also coordinates Zoning Commission meetings and sets the agenda for those meetings.

20. In 2019, Mr. Danny Knight was employed as Franklinton’s Code Enforcer.

21. From about October to November 2019, Mr. Bob Walters acted temporarily as Code Enforcer.

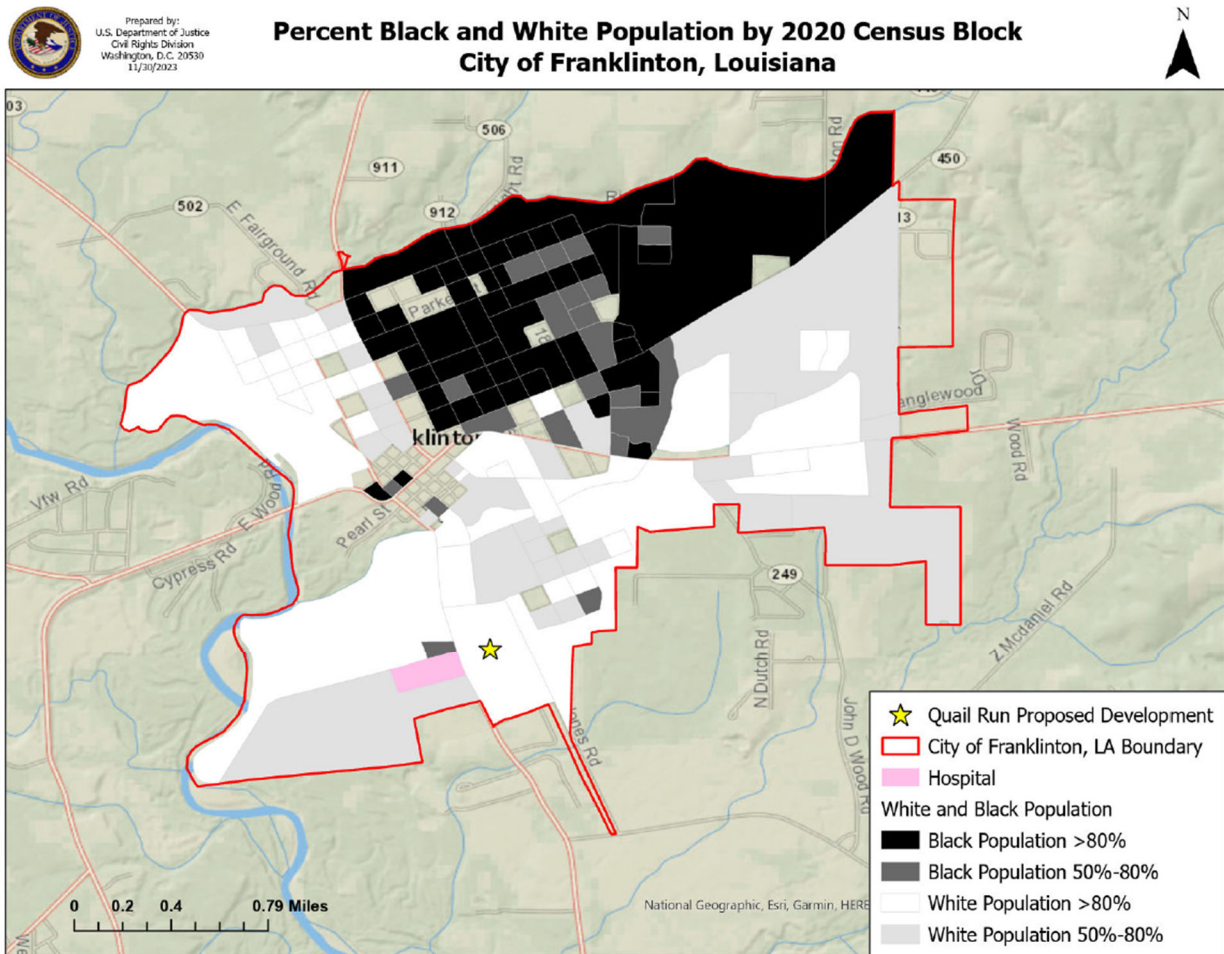
IV. ALLEGATIONS OF FRANKLINTON'S DISCRIMINATORY CONDUCT

A. Franklinton is Highly Segregated

22. Franklinton is residentially segregated by race.

23. According to the Census Bureau (2020), Franklinton's racial composition is 45.2% white and 48.3% Black.

24. The south side of Franklinton is majority-white and the north side is majority-Black. As depicted in the map below, according to Census Bureau data (2020) at the block level, Black residents are highly concentrated in the north of Franklinton: red blocks indicate a Black population of over 80% and orange blocks indicate a Black population between 50% and 80%. Yellow blocks are majority-white areas (over 50% white residents).



25. The Quail Run development (noted in the map above with a star) would have been sited on the south side of Franklinton in a high-majority-white neighborhood, which was over 80% white.

26. Franklinton perpetuated and reinforced segregation by unreasonably restricting private construction of housing that would have aided residential integration and increased affordable housing options predominantly for Black residents.

B. Franklinton’s Need for Affordable Housing

27. Franklinton has a short supply of housing available to low-income persons and families in the area and needs more affordable housing.

28. Standards adopted by the United States Department of Housing and Urban Development (“HUD”) define a “low income family” as a family whose annual income does not exceed 80% of the median income for the area, a “very low income family” as a family whose annual income does not exceed 50% of the median family income for the area, and an “extremely low income family” as a family whose annual income does not exceed 30% of the median family income for the area. 24 C.F.R. § 5.603.

29. In general, in Franklinton and elsewhere, it is very difficult for low-income, very low-income, and extremely low-income families to find housing that is affordable to them in the private housing market, unless the housing is subsidized or supported by some financial mechanism that allows the housing provider to offer rent prices at below market rates to those families.

30. Low-income households in Franklinton are disproportionately Black. In 2019, according to the Census Bureau, Franklinton was home to 1,739 households: 884 Black households (50.8%) and 822 white households (47.3%). 1,252 of those households were low-

income (defined by HUD as households earning 80% median income or less). 741 of Franklinton's low-income households (59.2%) were Black. By contrast, 477 low-income households in Franklinton (only 38.1%) were white.

31. In 2019, the Louisiana Housing Corporation designated Washington Parish a "Priority Development Area" for funding affordable housing projects through Low-Income Housing Tax Credits (LIHTC). The Louisiana Housing Corporation is a state agency that administers and awards the State's competitive LIHTC.

32. The Louisiana Housing Corporation designated Washington Parish as a Priority Development area because, among other things: 18% of the population was elderly, 23.2% of the population were persons with disabilities (the highest rate of all Louisiana parishes), 57.7% of renters were cost burdened (meaning that they spent more than 30% of their income on housing), 40.8% of children under the age of five were in poverty, and the median household income fell below \$46,000. As a result, the Louisiana Housing Corporation identified Washington Parish as one of the twelve Louisiana parishes (out of 64 total parishes), that was most in need of affordable housing.

33. There is no subsidized housing for low-income general occupancy in Franklinton. The only housing developments in Franklinton that offer below-market-rate-rental housing are restricted to seniors or persons with disabilities.

C. Franklinton's Zoning Ordinance Erects Unreasonable Barriers to Housing Opportunity

34. Franklinton's Zoning Ordinance does not adequately allow for new development of affordable housing, including multi-family housing or duplex-housing.

35. The Zoning Ordinance does not permit new multi-family use by right anywhere in the town. The only areas zoned for multi-family use are limited to the few parcels where housing

developments already existed before Franklinton established its current zoning map and does not designate any unutilized land for multi-family housing use. *See* Exhibit 1, Franklinton Zoning Map (multi-family housing “R3” zones indicated in pink).

36. The Zoning Ordinance does not permit new multi-family use by special permission anywhere in town, either. Although the Zoning Ordinance allows the Town to approve enumerated special exception uses for certain zones, multi-family housing is not identified as a permitted special exception use in *any* zone. Moreover, duplexes are only permitted as a special exception use in two zones – “C1: Light Commercial” (green) and “R4: Non-Conventional Residential,” which is designated for mobile homes (purple). *See* Zoning Ordinance § 4.103, § 3.403, and Exhibit 1.

37. Additionally, the Zoning Ordinance severely restricts the ability to change the zoning designation for the vast majority of land in the town. The Zoning Ordinance does not permit “spot zoning”² in single-family-detached residential “R1” zones (yellow). *See* Zoning Ordinance § 3.107 and Exhibit 1. Therefore, under the Ordinance, an R1 parcel cannot be rezoned to permit duplexes or other multi-family housing.

38. The Zoning Ordinance also identifies that residential use generally is “incompatible with,” or explicitly prohibited in, heavy commercial (“C2” brown), flood (“F1, F2, F4” blue and light pink), and industrial (“L1, L2” gray).

39. The paucity of land eligible for new multi-family or duplex housing development is illustrated in Franklinton’s zoning map attached hereto as Exhibit 1.

40. Franklinton’s Zoning Ordinance, rules, and practices erect unreasonable barriers to affordable housing developments and unreasonably restrict affordable housing opportunity in

² “Spot zoning: Rezoning of a lot or parcel of land to benefit an owner for a use incompatible with surrounding uses” Zoning Ordinance at § 12.

the town with the effect of discriminating against Black residents who are the residents most often in need of such housing in Franklinton.

D. The Quail Run Housing Development

41. Quail Run Developers sought to build an affordable housing development of twenty duplexes (“single-family attached” dwellings) in Franklinton. The duplexes were to be predominantly three-bedroom, two-bathroom homes. The Quail Run plan also included a community center with recreation facilities and a computer room, a walking path, lighted streets and sidewalks, a playground, a grilling area, landscaping, security cameras, and an on-site manager. The development would have provided forty new affordable housing units for households earning 80% or below area median income and would target households earning 60% or below area median income.³

42. Quail Run Developers applied for tax credits to fund the construction of Quail Run through the federal LIHTC program, established in Section 42 of the Internal Revenue Code, 26 U.S. Code § 42.⁴ In October 2019, through a competitive process, the Louisiana Housing Corporation awarded Quail Run Developers “9% tax credits” to subsidize the construction of Quail Run.

43. As a condition of receiving the tax credit, Quail Run housing would have been offered to low-income (80% AMI), very-low-income (50% AMI), and extremely low-income (30% AMI) renters at rental prices below market rates. In its application for the tax credits, Quail Run Developers committed a specific number of units to be affordable for persons at different median income levels, as set forth in the chart below:

³ “Area median income,” “median income,” or “AMI” as used in this Complaint means the 2019 U.S. Non-Metropolitan Median Income as defined by HUD (\$60,600).

⁴ Quail Run Developers formed Quail Run 2019, LP for the purpose of constructing and maintaining the Quail Run housing development proposed in Franklinton, Louisiana.

Income Level	20% AMI	30% AMI	50% AMI	60% AMI	70% AMI	80% AMI	Total Units
No. of Units	1	3	14	8	1	13	40

44. At each income level, a greater number of Black households in Franklinton would have income-qualified for housing at Quail Run than white households. For example, according to the Census Bureau (2019), in Franklinton:

- (a) for the 14 units set aside for at or below 50% AMI: 75.5% of Black families income-qualified compared to only 40.8% of white families;
- (b) for the 8 units reserved for at or below 60% AMI: 81.4% of Black families income-qualified compared to only 40.8% of white families; and
- (c) for the 13 units reserved for at or below 80% AMI: 83.8% of Black families income-qualified compared to 58% of white families.

45. However, because Franklinton did not approve zoning, Quail Run Developers could not proceed with construction and were forced to return the tax credits. As a result, Franklinton denied forty units of rental housing to low-income residents in its community, Quail Run Developers lost the opportunity and financing to develop affordable housing in Franklinton, and Franklinton's low-income residents, predominantly Black residents, were denied the opportunity to obtain affordable housing.

E. Franklinton's Zoning Denial

46. Quail Run Developers first contacted Franklinton's Code Enforcer, Mr. Danny Knight, in or around the first week of July 2019 to discuss the Quail Run development proposal.

47. During that initial discussion, Quail Run Developers and Code Enforcer Knight discussed potential realtors and potential properties for the development and discussed 1809 Main Street, across from the hospital, as a possible site for the development.

48. On July 9, 2019, Code Enforcer Knight also discussed the development project with the Zoning Commission. “A person interested in building apartments on approximately 14 acres of land had made contact with Danny Knight. Discussion held regarding some locations that might be suitable. The acreage located across from the hospital was discussed as a possible location.” July 9, 2019, Zoning Commission Meeting Minutes.

49. Thereafter, Quail Run Developers entered a contract to purchase property for the development at 1809 Main Street in Franklinton and sought Franklinton’s zoning approval of the site. The Quail Run site was in a zone designated “C-1: Light Commercial,” one of the extremely limited parcels in one of the only zones in Franklinton that, after special zoning approval, would permit the proposed housing development in the town.

50. Under Zoning Ordinance § 4.103, the C-1: Light Commercial district provides for “special exception” uses including “residential.”

51. Quail Run Developers consulted with Code Enforcer Knight about the process to request a special exception. Code Enforcer Knight told Quail Run Developers that it would need to present its zoning request to the Zoning Commission.

52. After consulting with Code Enforcer Knight, in July 2019, Quail Run Developers requested a “special exception” from Franklinton to build twenty duplexes—residential, single-family-attached dwellings—at 1809 Main Street, which is in a C-1 zone.

53. At this time, Franklinton did not require applications for zoning requests to the Zoning Commission to be submitted on any particular form.

54. After Quail Run Developers requested its zoning special exception, Code Enforcer Knight called the Zoning Commission to a meeting on July 23, 2019, at 5:00 p.m. to hear the zoning request for the Quail Run development. The zoning request for Quail Run was

the only business on the Zoning Commission's agenda that evening.

55. At the July 23, 2019, Zoning Commission meeting, Quail Run Developers presented to the Commission its plan for Quail Run and requested approval for a special exception use to build the residential development at 1809 Main Street. Quail Run Developers provided the Zoning Commission with documents including a "special exception request summary," an aerial map of the proposed site, building elevations, and references to Quail Run Developers' other housing projects as examples of their work. Quail Run Developers answered the Zoning Commissioners' questions, and the Commission discussed the zoning request.

56. At the meeting, the Zoning Commission unanimously voted "to grant a special exception within C-1 zoning to develop 20 duplex style buildings . . . pursuant to the Code of Ordinances for the Town of Franklinton, Appendix A, Zoning; Section 4.103 . . ." (hereafter the "July Recommendation").

57. Immediately after the Zoning Commission meeting adjourned, Code Enforcer Knight presented the Zoning Commission's written July Recommendation to Mayor Dillon so that the mayor could present the recommendation to the Board of Aldermen at the next regularly scheduled meeting that evening at 6:30 p.m.

58. The Zoning Ordinance mandates that, after the Zoning Commission makes a written recommendation: "The Board of Aldermen shall make their decision at the next regularly scheduled city council meeting." Zoning Ordinance at 3.

59. Under the terms of the Zoning Ordinance, the Zoning Commission presents its written zoning recommendations to the Board of Aldermen for hearing at the City Council meeting later in the same evening. Zoning Commission meetings are regularly held at 5:00 p.m. on Tuesdays and City Council meetings are held on the same day at 6:30 p.m.

60. In 2019, the Zoning Commission ordinarily provided its recommendations to the mayor and the mayor, or his agent, would add the Zoning Commission's recommendation to the agenda for the Town Council meeting later in the evening.

61. Despite this usual practice, Mayor Dillon refused to accept the Zoning Commission's July Recommendation for the City Council agenda that evening.

62. Since at least 2015, except for the July Recommendation for Quail Run, every Zoning Commission recommendation has been presented to the City Council on the same day that the Zoning Commission made its recommendation.

63. Following the Zoning Commission's July Recommendation, on July 23, 2019, and July 24, 2019, Mr. Knight signed and provided to Quail Run Developers two separate letters respectively stating that the proposed site for Quail Run "is properly zoned for the proposed project" and the "property is properly zoned correctly for its intended use."

64. The day after the Zoning Commission meeting, on July 24, 2019, Franklinton's official journal, the Era Leader, published an advertisement about Quail Run, including proposed average rental prices. Quail Run Developers placed the advertisement to fulfill part of its LIHTC application requirements.

65. Following the publication of the advertisement, residents expressed opposition to Franklinton officials, including the mayor, about low-income housing being located "in that area."

66. At the Zoning Commission's next regularly scheduled meeting on August 13, 2019, the Commission voted 3 to 2 to rescind its July Recommendation for Quail Run, even though the circumstances of the zoning request had not changed. The Zoning Commission Chair also decided to "hold" the Commission's vote, meaning that the Zoning Commission did not

send written notice of its vote to the City Council.

67. As a result, the Zoning Commission's July Recommendation to approve Quail Run Developers' special exception request remained pending with the City Council.

68. At least within the last ten years, the Franklinton Zoning Commission had never before, and has never since, voted to rescind a recommendation.

69. No Franklinton official notified Quail Run Developers that the Zoning Commission intended to discuss or act on its zoning request for Quail Run at the August 13, 2019, meeting. Nor did any Franklinton official notify Quail Run Developers after the meeting that the Zoning Commission had voted to rescind the July Recommendation.

70. The Zoning Commission had no valid basis to rescind its July Recommendation.

71. On August 13, 2019, at the City Council meeting following the Zoning Commission's vote to rescind, Quail Run Developers presented to the City Council and town residents about the plans for Quail Run and answered questions.

72. At the August 13, 2019, meeting, the Board of Aldermen did not act on the Zoning Commission's July Recommendation, nor did any Franklinton official disclose the Zoning Commission's vote to rescind earlier that evening.

73. During the August 13, 2019, City Council meeting, a Zoning Commissioner spoke in the public comment period and stated, ". . . I agree that we need affordable homes and housing, but that's not the spot." In response, a town resident asked: "But why not? . . . It seems to me that it's 'not the spot' because it's about minorities trying to move to the area and I think that it's very unfair . . . let us see what it's like to have a nice place to stay." No one from the City Council responded to this resident.

74. Mayor Dillon never presented the Zoning Commission's July Recommendation to

approve zoning for Quail Run to the Board of Aldermen. The Board never voted on Quail Run Developers' zoning request for Quail Run.

75. Additionally, after the vote to rescind its recommendation, the Zoning Commission did not take any further official action on the zoning request for Quail Run and never communicated its vote to rescind to the City Council.

76. In the subsequent months, Quail Run Developers contacted Franklinton numerous times about the status of its zoning request for Quail Run.

77. On November 16, 2019, the acting Code Enforcer emailed Quail Run Developers that "at this time your application has been denied."

78. This was the first time that Franklinton had ever communicated to Quail Run Developers that its zoning request would not be approved.

79. Despite the Code Enforcer's email, the City Council had never taken a vote on the Zoning Commission's July Recommendation to approve Quail Run Developers' request and the Commission never communicated to the City Council or Quail Run Developers that it had voted to rescind its July Recommendation. In fact, it had specifically "held" its vote to rescind.

80. The November 16, 2019, email did not state the reasons for Franklinton's denial of Quail Run Developers' zoning request. It also did not provide information on how to cure any purported issues or contest the zoning denial.

81. Franklinton's conduct had the intent and effect of discriminating against prospective Black tenants and residents of the town.

82. Quail Run Developers filed a complaint with HUD on April 9, 2020. On February 24, 2021, HUD referred the matter to the United States.

F. Franklinton's Denial of Quail Run Zoning Disproportionately and Adversely Affected Black Residents

83. As alleged in paragraphs 41-45, Quail Run would have predominantly served households earning 60% of the area median income or less and dedicated some units for households earning 80% of the area median income or less. And, as described in paragraphs 30 and 44, Black households in Franklinton were significantly more likely to qualify for housing at Quail Run than white households in that area at all income levels.

84. Further, as discussed in paragraphs 22-26, Franklinton denied housing opportunity in a majority-white neighborhood that would have benefitted predominantly Black residents. Franklinton's actions perpetuated and reinforced segregated living patterns in Franklinton.

V. DEFENDANT'S CONDUCT VIOLATES THE FAIR HOUSING ACT

85. By the conduct set forth above in paragraphs 1-84, Franklinton has (1) made dwellings unavailable or denied dwellings to persons because of race or color, in violation of 42 U.S.C. § 3604(a); and (2) interfered with persons in the exercise or enjoyment of rights granted or protected by the Fair Housing Act, in violation of 42 U.S.C. § 3617.

86. Based on the foregoing conduct, Franklinton has engaged in:

- a. A pattern or practice of resistance to the full enjoyment of rights granted by the Fair Housing Act, in violation of 42 U.S.C. § 3614(a); and
- b. A denial to a group of persons rights granted by the Fair Housing Act, which denial raises an issue of general public importance, in violation of 42 U.S.C. § 3614(a).

87. Franklinton's conduct described above was intentional, willful, and taken in disregard for the rights of others.

88. Quail Run Developers, and residents or prospective residents who have been harmed by Franklinton's discriminatory housing practices, are aggrieved persons within the meaning of 42 U.S.C. § 3602(i) and 42 U.S.C. § 3614(d)(1)(B) and have suffered damages as a result of Franklinton's conduct.

PRAYER FOR RELIEF

WHEREFORE, the United States prays that the Court enter an order that:

- a. Declares that Franklinton's conduct, as alleged, violates the Fair Housing Act;
- b. Enjoins Franklinton, its officers, employees, agents, successors, and all other persons in active concert or participation with them, from discriminating against any person because of race or color in violation of the Fair Housing Act, including further making unavailable or denying dwellings because of race or color, or interfering with any person engaged in the exercise or enjoyment of rights granted or protected by the Fair Housing Act;
- c. Requires that Franklinton take affirmative steps to comply with the Fair Housing Act, including steps necessary to prevent the recurrence of any discriminatory conduct in the future and to eliminate, to the extent practicable, the effects of its unlawful housing practices as described herein, including restoring, as nearly as practicable, persons aggrieved by Franklinton's conduct to the position they would have been in but for the discriminatory conduct;
- d. Awards monetary damages to each person aggrieved by Franklinton's discriminatory conduct, pursuant to 42 U.S.C. § 3614(d)(1)(B);
- e. Assesses a civil penalty against Franklinton in an amount authorized by 42 U.S.C. § 3614(d)(1)(C) to vindicate the public interest; and

f. Awards such additional relief as the interests of justice may require.

DEMAND FOR JURY TRIAL

The United States hereby demands a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Dated: June 27, 2024

Respectfully Submitted,

MERRICK B. GARLAND
Attorney General

DUANE A. EVANS
United States Attorney
Eastern District of Louisiana

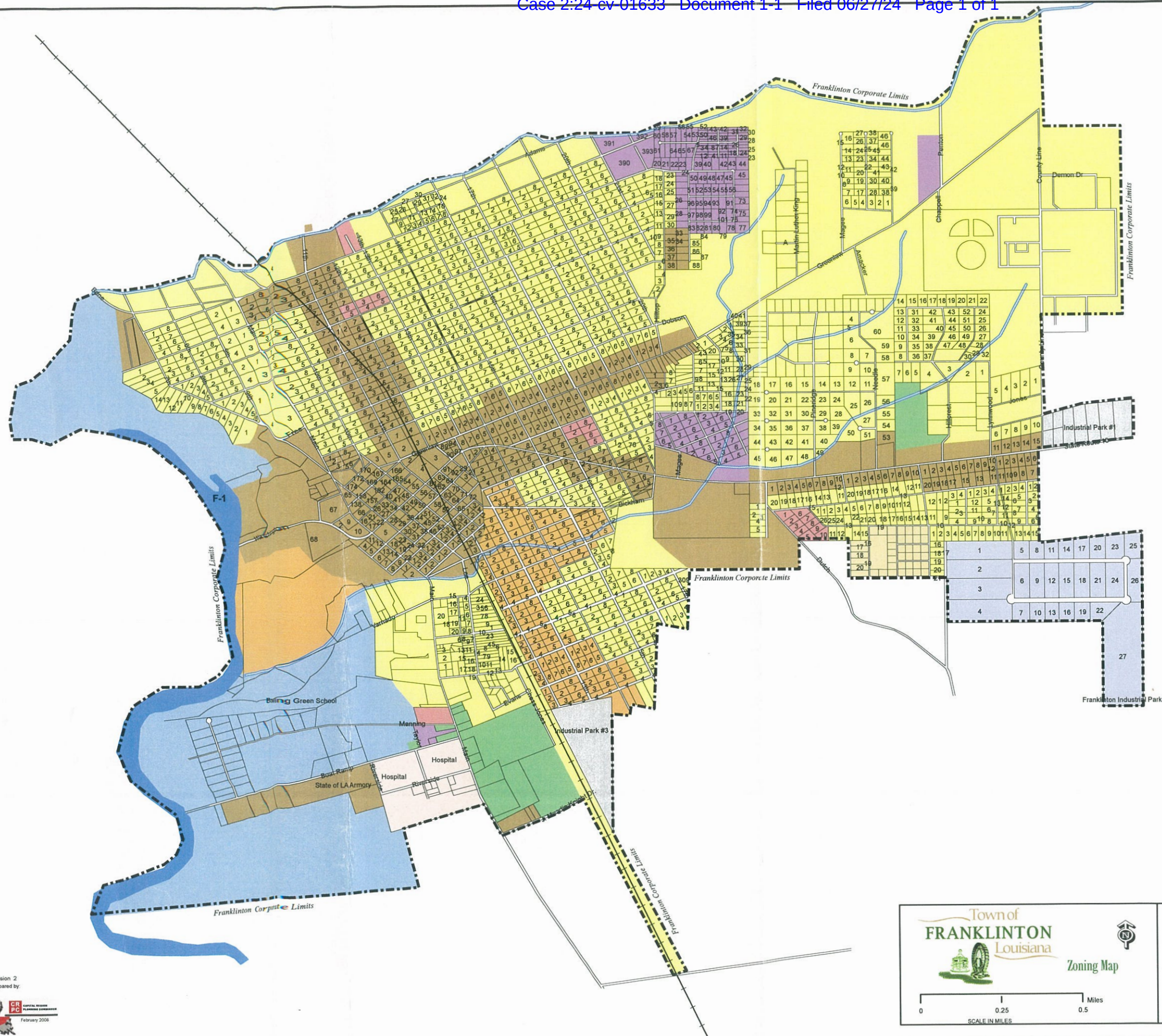
KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

s/ Sandra Ema Gutierrez
SANDRA EMA GUTIERREZ
(LA Bar No. 17888)
Assistant U.S. Attorney
U.S. Attorney's Office
650 Poydras Street, Suite 1600
New Orleans, LA 70130
Phone: (504) 680-3124
Fax: (504) 680-3186
Email: sandra.gutierrez@usdoj.gov

s/ Jenna A. Raden
CARRIE PAGNUCCO
Chief
TIMOTHY J. MORAN
Deputy Chief
JENNA A. RADEN (DC Bar No. 1724701)
KINARA A. FLAGG (NY Bar No. 5092143)
Trial Attorneys
Housing and Civil Enforcement Section
Civil Rights Division
U.S. Department of Justice
150 M Street, NE
Washington, D.C. 20530
Phone: (202) 305-5452
Fax: (202) 514-1116
Email: jenna.raden@usdoj.gov

Attorneys for United States of America

EXHIBIT 1



Franklinton Zoning District Legend

F 1 Floodway	R 1 Single Family Residential	C-1 Light Commercial
F 2 Flood Plain Camps	R 2 Residential	C-2 Heavy Commercial
F 3 Flood Plain Residential	R 3 Multi-Family Residential	L 1 Light Industrial
F 4 Medical Facility	R 4 Non-Conventional Residential	L 2 Heavy Industrial

Town of
FRANKLINTON
Louisiana

Zoning Map

SCALE IN MILES

Honorable Earle R. Brown Mayor	Date of Original Preparation July 26th 1983	Official Zoning District Map Franklinton, Louisiana
	Map Amendment Date December 1st 1998	
	1. February 15th 2008	
	2. _____	
3. _____	4. _____	