

ALBERTO GONZALES  
Attorney General  
WAN J. KIM  
Assistant Attorney General  
Civil Rights Division  
STEVEN H. ROSENBAUM  
Chief  
KEISHA DAWN BELL  
Deputy Chief  
JULIE J. ALLEN  
E-mail: [julie.allen@usdoj.gov](mailto:julie.allen@usdoj.gov)  
MING-YUEN MEYER-FONG  
E-mail: [ming-yuen.meyer-fong@usdoj.gov](mailto:ming-yuen.meyer-fong@usdoj.gov)  
Attorneys  
Housing & Civil Enforcement Section  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W. - G Street  
Washington, DC 20530  
Tel: (202) 307-6275  
Fax: (202) 514-1116

DEBRA WONG YANG  
United States Attorney  
LEON W. WEIDMAN  
Chief, Civil Division  
KEVIN B. FINN  
Assistant United States Attorney  
Calif. Bar No. 128072  
E-mail: [kevin.finn@usdoj.gov](mailto:kevin.finn@usdoj.gov)  
Federal Building, Suite 7516  
300 North Los Angeles Street  
Los Angeles, CA 90012  
Tel: (213) 894-6739  
Fax: (213) 894-7327

Attorneys for Plaintiff  
United States of America

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA  
Plaintiff,

v.

DONALD STERLING, individually, in his capacity as trustee for the Sterling Family Trust, and doing business as Beverly Hills Properties; ROCHELLE STERLING, individually and in her capacity as trustee for the Sterling Family Trust; STERLING FAMILY TRUST; and THE KOREAN LAND COMPANY, L.L.C.

COMPLAINT  
(And Demand for Jury Trial)

Defendants.

\_\_\_\_\_ )

Plaintiff United States of America, alleges:

1. This action is brought by the United States to enforce the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (“Fair Housing Act”).
2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1345 and 42 U.S.C. § 3614(a).
3. Venue in this district is proper pursuant to 28 U.S.C. § 1391(b). The events or omissions giving rise to this claim occurred in the Central District of California; the property that is the subject of the action is situated in the Central District of California; and the Defendants conduct business in this District.
4. Defendant Donald Sterling and Defendant Rochelle Sterling are residents of Los Angeles, California, and are the owners and/or managers of numerous multi-family residential rental properties located in Los Angeles County, California.
5. Beverly Hills Properties is Donald Sterling’s “doing business as” name. Beverly Hills Properties manages multi-family residential rental properties located in Los Angeles County, California.
6. Defendant Sterling Family Trust holds title to and owns multi-family residential rental property in Los Angeles County.
7. At all times relevant to this Complaint, Defendants Donald Sterling and Rochelle Sterling have been trustees of the Defendant Sterling Family Trust, and are sued

herein both individually and as trustees of the Sterling Family Trust.

8. Defendant Korean Land Company is a California limited liability company that holds title to and owns multi-family residential rental property in Los Angeles County.
9. Defendants' multi-family residential rental properties in Los Angeles County are dwellings within the meaning of the Fair Housing Act, 42 U.S.C. § 3602(b).
10. Defendants Donald Sterling, Rochelle Sterling, and their agents and/or employees have engaged in a pattern or practice of discrimination on the basis of race, national origin, and familial status in connection with the rental of dwellings owned by the Korean Land Company, the Sterling Family Trust, and Donald and Rochelle Sterling, in violation of the Fair Housing Act.
11. Donald Sterling, Rochelle Sterling, the Korean Land Company, and the Sterling Family Trust have, at all times relevant to this Complaint, had the authority to control and direct the agents who committed the discriminatory actions stated herein.
12. The Defendants and their agents have engaged in a pattern or practice of discrimination by, among other ways:
  - (a) Refusing to rent to non-Koreans at the multi-family residential rental properties that Defendants own or manage, or have owned or managed, in the Koreatown section of Los Angeles County;
  - (b) Refusing to rent to African-Americans at the multi-family residential rental properties that Defendants own or manage, or have owned or managed, in the Beverly Hills section of Los Angeles County;
  - (c) Refusing to rent to families with children at the multi-family residential rental properties that Defendants own or manage, or have owned or managed, in Los Angeles County;
  - (d) Creating, maintaining, and perpetuating an environment that is hostile to non-Korean tenants at the multi-family residential rental properties that Defendants own or manage, or have owned or managed, in the Koreatown

section of Los Angeles County;

(e) Providing inferior treatment to non-Korean tenants in the terms, conditions, and/or privileges of a rental at the multi-family residential rental properties that Defendants own or manage, or have owned or managed, in the Koreatown section of Los Angeles County;

(f) Misrepresenting the availability of units to non-Koreans at the multi-family residential rental properties that Defendants own or manage, or have owned or managed, in the Koreatown section of Los Angeles County;

(g) Misrepresenting the availability of units to African-Americans at the multi-family residential rental properties that Defendants own or manage, or have owned or managed, in the Beverly Hills section of Los Angeles County;

(h) Misrepresenting the availability of units to families with children at the multi-family residential rental properties that Defendants own or manage, or have owned or managed, in Los Angeles County;

(i) Making statements and publishing notices or advertisements in connection with the rental of units that express a preference for Korean tenants and discrimination against non-Korean tenants; and

(j) Making statements or publishing notices or advertisements in connection with the rental of units that express discrimination against African-Americans and families with children as tenants.

13. At all relevant times Defendants Donald Sterling, Rochelle Sterling, their agents and/or their employees committed the discriminatory acts contained in Paragraph 12 as agents for the Korean Land Company, the Sterling Family Trust, or Donald and Rochelle Sterling.
14. The conduct of the Defendants as described in Paragraph 12, constitutes:
  - (a) A refusal to rent, a refusal to negotiate for the rental of, and conduct otherwise making unavailable or denying dwellings to persons because of race,

- national origin, and familial status, in violation of 42 U.S.C. § 3604(a);
- (b) Discrimination in the terms, conditions, or privileges, of rental of dwellings on the basis of race or national origin, in violation of 42 U.S.C. § 3604(b);
- (c) Statements of preference or limitation on the basis of race, national origin and familial status in connection with the rental of dwellings, in violation of 42 U.S.C. § 3604(c);
- (d) Publications or notices of preference or limitation on the basis of race or national origin in connection with the rental of dwellings, in violation of 42 U.S.C. § 3604(c); and
- (e) Misrepresentations regarding the availability of units on the basis of race, national origin and familial status, in violation of 42 U.S.C. § 3604(d).

15. The conduct of Defendants, as described herein, was intentional, willful, and taken in disregard for the rights of others.
16. The conduct of the Defendants described in Paragraph 12 constitutes:
  - (a) A pattern or practice of resistance to the full enjoyment of rights secured by the Fair Housing Act, 42 U.S.C. § 3601 et seq.; and
  - (b) A denial to a group of persons of rights granted by the Fair Housing Act, 42 U.S.C. § 3601 et seq., which denial raises an issue of general public importance.
17. Individuals who were subjected to Defendants' discriminatory housing practices are aggrieved persons as defined by the Fair Housing Act, 42 U.S.C. § 3602(i), and have suffered actual injury and damages as a result of Defendants' conduct as described herein.

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

- A. Declares that Defendants' policies and practices, as alleged herein, violate the Fair Housing Act, as amended, 42 U.S.C. §§ 3601 et seq.;

- B. Enjoins the Defendants, their agents, employees, and successors, and all other persons in active concert or participation with them from:
- (1) Discriminating on account of race, national origin, and familial status against any person in any aspect of the rental of a dwelling; and
  - (2) Interfering with any person in the exercise or enjoyment of rights granted or protected by the Fair Housing Act.
- C. Awards monetary damages to each person aggrieved by Defendants' discriminatory housing practices, pursuant to 42 U.S.C. § 3614(d)(1)(B); and
- E. Assesses a civil penalty against each Defendant in order to vindicate the public interest, pursuant to Section 814(d)(1)(C) of the Fair Housing Act, 42 U.S.C. § 3614(d)(1)(C).

The United States further prays for such additional relief as the interests of justice may require.

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, the United States of America hereby demands a trial by jury of this action of all issues triable of right to a jury.

ALBERTO GONZALES  
Attorney General

DEBRA WONG YANG  
United States Attorney

WAN J. KIM  
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Civil Rights Division

LEON W. WEIDMAN  
Chief, Civil Division

STEVEN H. ROSENBAUM  
Chief, Housing and Civil  
Enforcement Section  
Civil Rights Division

KEVIN B. FINN  
Assistant United States Attorney

KEISHA DAWN BELL  
Deputy Chief

Calif. Bar No. 128072  
E-mail: [kevin.finn@usdoj.gov](mailto:kevin.finn@usdoj.gov)  
Federal Building, Suite 7516  
300 North Los Angeles Street  
Los Angeles, CA 90012  
Tel: (213) 894-6739  
Fax: (213) 894-7327

JULIE J. ALLEN  
E-mail: [julie.allen@usdoj.gov](mailto:julie.allen@usdoj.gov)  
MING-YUEN MEYER-FONG  
E-mail: [ming-yuen.meyer-fong@usdoj.gov](mailto:ming-yuen.meyer-fong@usdoj.gov)  
Attorneys  
Housing and Civil Enforcement Section  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave., N.W. - G St.  
Washington, D.C. 20530  
Phone: (202) 307-6275  
Fax: (202) 514-1116

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