

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

HIDDEN VILLAGE, LLC)
26100 Brush Avenue)
Euclid, OH 44132)

Plaintiff,)

-vs-)

CITY OF LAKEWOOD, OHIO)
12650 Detroit Avenue)
Lakewood, OH 44107)

COMPLAINT

Jury Demand Endorsed hereon

and)

THOMAS J. GEORGE, individually)
and in his former official capacity as)
Mayor of The City of Lakewood)
12650 Detroit Avenue)
Lakewood, OH 44107)

and)

CHARLES E. BARRETT,)
individually and in his official capacity)
as Building Commissioner of the City of)
Lakewood)
12650 Detroit Avenue

Constitution of the United States, tortious interference of Plaintiff's business and trespass.

CLAIMS AND JURISDICTION

2. This action is brought by a "person" under the laws of the State of Ohio, a corporate entity, pursuant to the Title VIII of the Civil Rights Act of 1968, as amended, the Fair Housing Act, 42 U.S.C. §§3601, *et seq.* (2008 Supp.), the Civil Rights Act of 1866, 42 U.S.C. §1982 (2008 Supp.), the Civil Rights Act of 1870, as amended, 42 U.S.C. §1981 (2008 Supp.) and the Civil Rights Act of 1871, 42 U.S.C. §1983. Jurisdiction is invoked pursuant to §§3613 and 3617 of Title VIII of the Civil Rights Act of 1968, as amended, Sections 813 and 818 of the Fair Housing Act, and 28 U.S.C. §§1343(3) and (4) with respect to the other federal claims as well as state common law tort claims pursuant to 28 U.S.C. §1367.

PARTIES

3. Plaintiff, HIDDEN VILLAGE, LLC, ("Hidden Village, LLC" or "Plaintiff") is a limited liability company organized under the laws of the State of Ohio and is a "person" as defined by the Act. Plaintiff at all relevant times has been ready, willing and able to provide housing opportunities and at all relevant times has sought to provide housing free from restrictions of race and free from coercion and intimidation. Plaintiff Hidden Village, LLC is the

owner and manager of the apartment building at issue, Hidden Village, and has marketed and rented its units free from considerations of race.

4. Defendant, CITY OF LAKEWOOD, OHIO, (“City” or “Lakewood”) is a municipal corporation organized under the laws of the State of Ohio and which has a duty to insure that residents may live in its borders free from interference, coercion and intimidation based on race.

5. Defendant, THOMAS J. GEORGE, (“Mayor”) was, at all relevant times, Mayor and chief executive officer of Defendant City of Lakewood, and maintained overall responsibility for all housing, zoning and had a duty to require all departments of the City to comply with the aforesaid federal statutes regarding the Plaintiff’s right to rent to persons, and had a duty to insure that Plaintiff could rent to prospective tenants equally irrespective of the race of the resident.

6. Defendant, CHARLES E. BARRETT, (“Barrett”) was, at all relevant times, an employee of Defendant City of Lakewood, and, as Building Commissioner, was responsible for all housing, zoning and other codes and had a duty to insure that Plaintiff could rent to prospective tenants equally irrespective of the race of the residents.

7. Defendant, EDWARD E. FITZGERALD, (“Fitzgerald”) was, at all relevant times, an employee of Defendant City of Lakewood, and, as project administrator/housing inspector, was responsible for all housing codes and

had a duty to insure that Plaintiff could rent to prospective tenants equally irrespective of the race of the residents.

8. Defendant, LAWRENCE MROZ, was, at all relevant times, an employee of Defendant City of Lakewood, and, as fire chief, was responsible to insure that the fire codes were enforced in accordance with the codes of the City of Lakewood and not unlawfully used to intimidate and interfere with the right of the Plaintiff to rent to prospective tenants equally irrespective of the race of the residents.

9. Defendant, TIMOTHY J. MALLEY, was, at all relevant times, an employee of Defendant City of Lakewood, and, as police chief, was responsible for enforcing the laws of the State of Ohio, and not unlawfully use such position of authority to intimidate and interfere with the right of the Plaintiff to rent to prospective tenants equally irrespective of the race of the residents.

COUNT I

10. Plaintiff reasserts the foregoing allegations and incorporates them by reference as if fully set forth herein.

11. The City of Lakewood, is a predominantly white suburb located immediately west of the City of Cleveland, Ohio, a large American city populated primarily by African-American citizens.

12. Migration trends have reflected that minorities have mostly moved to the contiguous suburbs to the east of Cleveland.

13. Western suburbs, including the contiguous suburb of Lakewood, Ohio, remain primarily white.

14. African-American homeseekers have in the past encountered housing discrimination based on race in Lakewood.

15. In 2005, Lutheran Metropolitan Ministries, a religious-based non-profit organization, established a Youth Re-Entry Program under the name “Youth Re-Entry Programs/Lutheran Metro Ministry” (“YRP”) to ready young adults, overwhelmingly minority, for the real world as they emerge from foster care.

16. At all relevant times, nearly all the participants in YRP were African-American, and none had criminal records known to Plaintiff.

17. YRP teaches life skills including independent living skills, work, school and social skills. The YRP is certified by the State of Ohio Department of Job and Family Services to operate or provide independent living arrangements.

18. Hidden Village Apartments (“Hidden Village”) is a ninety seven (97) multi-unit apartment complex located at 11849 Clifton Boulevard, on the eastern border of Lakewood near the Cleveland city limits.

19. African-American residents of Hidden Village and Plaintiff Hidden Village LLC have been subjected to a pattern and practice of government intimidation and coercion based on race by Defendant City of Lakewood and Defendant City officials.

20. In December, 2005 a representative of Plaintiff Hidden Village LLC became acquainted with the Director of Lutheran Metropolitan Ministries' YRP.

21. Plaintiff agreed that Hidden Village Apartments would be an excellent apartment complex to advance the YRP program.

22. Although Plaintiff Hidden Village LLC did not anticipate a pattern and practice of coercion and intimidation by Defendants, Plaintiff Hidden Village LLC was aware that YRP's utilization of Hidden Village Apartments would probably result in the largest concentration of African-Americans anywhere in the City of Lakewood.

23. Plaintiff Hidden Village LLC anticipated that, because the program guaranteed all rents, provided social services support and guaranteed that participants in the program met rigid criteria in order to participate in the YRP program, YRP participants would be desirable and responsible tenants.

24. Plaintiff Hidden Village LLC welcomed all YRP participants because it was impressed how Lutheran Metropolitan Ministries was guiding

young people with living skills, educational and employment opportunities and other transitional steps from foster care into the “real world.”

25. Initially, two buildings consisting of 32 suites were made available to YRP by Hidden Village LLC.

26. Plaintiff Hidden Village LLC has extensively refurbished its common areas and suites with new kitchens, new electrical systems, new windows, air conditioning, modern appliances, built-in microwaves, dishwashers, marble bath floors and marble shower surrounds and, in addition, all common areas were renovated including the parking lots, roofs, and garages.

27. Defendants were aware that the additions and improvements to Hidden Village Apartments have resulted in one of the most modern, violation-free building complexes in the City of Lakewood.

28. Lutheran Metropolitan Ministry found the Hidden Village Apartments well suited for its independent-living program because Hidden Village Apartments were very modern, clean, well-managed and contained a large number of efficiency units in excellent condition.

29. Hidden Village presented an opportunity to place African-American young adults in a desirable neighborhood and living environment from which they could develop increased living, educational, vocational and social skills.

30. In January, 2006, Plaintiff Hidden Village LLC and Lutheran Metropolitan Ministry met to negotiate leases and to facilitate the relationship to benefit the young people who participate in the program.

31. Plaintiff participated in efforts to start the transition of residents to Hidden Village Apartments.

32. In January, 2006, Lutheran Metropolitan Ministries met with an official of Defendant City of Lakewood to explain the program and facilitate working with the Defendant as the transition took place.

33. In February, 2006, Lutheran Metropolitan Ministries, Plaintiff and a City representative followed up with a meeting with City of Lakewood officials.

34. Defendant Barrett, on behalf of Defendant City of Lakewood, asserted to Lutheran Metropolitan Ministries that the YRP program violated Lakewood zoning law even though he knew or should have known that such use was not a violation of the City zoning code.

35. Defendants asserted that YRP was not a residential use but an institutional use, despite an explanation by the Plaintiff and by YRP that it was strictly residential.

36. At all meetings between YRP, Plaintiff and Defendants, the City of Lakewood had police present in an effort to intimidate the YRP from renting from the Plaintiff.

37. Defendants, in furtherance of their efforts to interfere with the Plaintiff's right to rent to YRP, proposed that YRP move to undesirable sections of the City.

38. Defendants and its officials made clear to the Plaintiff that the African American prospective tenants in the YRP program were unwelcome at Hidden Village or in the desirable sections of the City of Lakewood.

39. Throughout February, 2006, representatives of Plaintiff Hidden Village LLC and Lutheran Metropolitan Ministry made concerted efforts to help Defendants understand that individual suites in Hidden Village Apartments were occupied by individual YRP participants and all participants were responsible young citizens.

40. When Defendants were not successful in intimidating the Plaintiff from proceeding to rent to the YRP tenants, it then claimed that Hidden Village was operating a "group home" in violation of the Lakewood zoning code even though Defendants knew or should have known that the Plaintiff was not operating a Group Home.

41. Plaintiff made clear that none of the reasons Defendants were asserting were supported by law, and advised City officials that it planned on renting its apartments to the YRP tenants.

42. On March 1, 2006, Plaintiff shared legal research with Defendant officials demonstrating that the renting of its apartments was not a violation of the City zoning code.

43. On April 11, 2006, the first twenty-five (25) African American tenants moved into Hidden Village Apartments.

44. Throughout April and May, 2006, Plaintiff and Lutheran Metropolitan Ministries made efforts to continue to work with Defendant officials, but Defendants were opposed to young African-American men and women moving into the City.

45. On May 18, 2006, despite the research given to them which proved the contrary, Defendants issued zoning violations to the Plaintiff.

46. By June 1, 2006, Plaintiff and YRP filed notices of appeal and continued discussions with Defendants' law department.

47. Defendants' representatives continued to express outrage that Hidden Village, LLC permitted the YRP tenants to occupy the units without advance consent from the City even though all Defendants knew or should have known that the Plaintiff was not required by law to advise City officials when a new tenant was moving in to an apartment unit.

48. On February 28, 2007, Defendant George wrote a letter to Jan Roller, President of the Lutheran Metropolitan Ministry, referring to the move-in as a "Surprise Move-In," and in violation of the Plaintiff's right to

rent to African Americans without interference, threatened to “have the program removed from Lakewood at the earliest possible time.”

49. Plaintiff, whose owners have had more than twenty years of owning and managing multi-family properties in Lakewood, advised Defendant George that nothing in the law required “permission” from the Defendants to rent apartments.

50. The Plaintiff provided Defendants research that proved that (1) the occupancy by the YRP did not fall into the definition of a group home under Defendant’s code; (2) the YRP had a primary residential purpose which was to teach independent living skills, which was completely consistent with the residential use as provided in Defendant’s zoning code; (3) Defendant City of Lakewood maintained existing independent living apartment complexes in which white persons resided and (4) Defendant City of Lakewood already had Section 8 tenants whose rents are subsidized by another and the YRP residents were no different except YRP tenants were African American.

51. On June 16, 2006, Plaintiff’s appeal was transferred from Defendant’s Board of Zoning Appeals (BZA) to Defendant’s Planning Commission.

52. Preceding the hearing, unknown persons distributed flyers around Hidden Village Apartments and throughout the neighborhood generating the belief that the new African-American residents in Lakewood were ex-felons.

53. Although some attendees originally thought the YRP-Hidden Village residents were part of a “re-entry” program for felons rather than for young people transitioning from foster care, most attending supported Plaintiff’s efforts to assist these young people after the program was explained.

54. At the hearing, Plaintiff explained that all YRP tenants had no criminal records, a requirement to participate in the program, and were learning independent living skills and related life skills.

55. As a result of information provided at the June, 2006 hearing, Defendant’s planning commission unanimously ruled in favor of the Plaintiff and held that the tenancy of the YRP at Hidden Village Apartments was in compliance with the City zoning code.

56. The Defendant City did not appeal the decision of the Lakewood Board of Zoning Appeals.

57. Despite the unanimous approval, a representative of Defendant’s city council set up another meeting based on a complaint by two white neighbors.

58. One neighbor reported that one teen had “verbally harassed” someone working at her building, though it was never determined that it was a YRP tenant.

59. The other thought he had seen a YRP teen making a drug deal, but this was also uncorroborated.

60. Defendant's police claimed that YRP was responsible for a "crime wave" and that response calls to Hidden Village had doubled since YRP had moved in as compared to the same period the previous year.

61. Defendants were aware that the previous use of the apartment building was by a diesel mechanic school dormitory where there were substantial problems.

62. Defendants were aware that the police information was erroneous because Hidden Village had a 34%- 41% vacancy rate during the previous year and YRP tenants occupied only 30 of 97 apartments.

63. Defendants failed to factor response calls to the other 66 tenants and failed to account for instances in which YRP tenants were victims of a crime.

64. Defendant's city councilwoman acknowledged that the police had failed to make that differentiation and recommended that it be done in the future.

65. Defendant's city councilwoman recommended that only the YRP tenants be placed in "community service," but did not urge similar service for white tenants at Hidden Village or for any other location in the City of Lakewood.

66. Notwithstanding, to allay concerns, YRP advised the Defendants that surveillance equipment was previously installed to monitor its tenants in an adjoining alley where tenants gathered out of sight of YRP staff.

67. Plaintiff asked several times how YRP could cooperate with and assist the police, but no suggestions were forthcoming.

68. On April 28, 2007, Defendant Thomas George wrote a letter to Lutheran Metropolitan Ministry expressing continued unhappiness that the young people moved to Lakewood by surprise and in spite of opposition by the city.

69. Defendant George also stated that police activity has more than doubled in the area due to the program's presence, despite earlier information that it had nothing to do with YRP.

70. Defendant George requested that program "voluntarily move out" the tenants or, if not, he would "seek to have the program removed from Lakewood."

71. Defendant City continued to harass and attempt to intimidate Plaintiff through its police department, fire department and building department.

72. Plaintiff Hidden Village LLC advised that Defendants City of Lakewood, George and others were engaging in coercion and interference and were violating, among other things, the Fair Housing Act.

73. Unsubstantiated assertions by Defendant's police department were behind the Defendants' efforts to coerce and intimidate young African-American tenants to leave their residence at Hidden Village Apartments.

74. Lutheran Metropolitan Ministry was able to prove to Defendants that (a) YRP tenants had a good relationship with Lakewood schools, (b) tenants are employed in the neighborhood and (c) there was no reason to move.

75. Despite the foregoing, Defendant George told Lutheran Metropolitan Ministry he "supported" the police and they would continue to scrutinize Hidden Village to make sure its residents would not be "causing problems."

76. Notwithstanding the foregoing, Defendant George expressed resentment that YRP tenants moved to Lakewood by "stealth" on Good Friday.

77. On May 22, 2007, without probable cause, ten (10) white police, fire officials, building department officials and health department officials appeared unannounced at Hidden Village Apartments without warrants, including a canine unit in a van, to conduct a suite-to-suite raid in order to inspect apartments occupied by African American YRP tenants.

78. In order to facilitate Defendants' police and fire multi-unit raid, Defendants contacted the on-site manager to inform her of the on-the-spot warrantless suite searches.

79. The massive police/fire/health/and building department raid to invade individual suites was unprecedented.

80. Defendants only searched African-American tenants' suites and never even requested to inspect the other units in the Hidden Village apartment complex where white tenants lived.

81. Because most of the apartments searched were occupied by tenants who are young African-Americans, Defendant police and fire officials assumed they would find weapons or drugs.

82. They found no weapons or drugs.

83. Although Defendants knew both Lutheran Metropolitan Ministries and Plaintiff Hidden Village LLC had legal counsel, they went forward with warrantless searches with the purpose and effort of coercion and intimidation of African-American young people without informing the lawyers.

84. Upon learning of the raid in progress, counsel for the Plaintiff demanded that all City officials leave and obtain a search warrant.

85. The City and its officials failed to leave, continued to conduct their raid and never obtained a warrant.

86. As a consequence of the raid, on May 23, 2007, the City of Lakewood was put on formal notice that future warrantless searches and other intimidating behavior would not be tolerated.

87. In spite of the Plaintiff's demand that the City not enter its property without a warrant, Defendants continued their pattern and practice of intimidation and coercion by appearing on the premises several days later with a state fire official.

88. Defendant officials and others again sought to enter the units without notice or without probable cause, but were denied.

89. When Defendant was barred, Defendant's Fire Marshall threatened that he would get a warrant, to which Plaintiff's representative indicated such would be necessary in order to enter.

90. Plaintiff Hidden Village LLC again contacted Defendants and again stated that no further entrances to Hidden Village Apartments were to be made without its permission or a warrant.

91. On May 31, 2007, at approximately 9:45 a.m., Defendant's fire inspector, accompanied by a state fire official, entered onto the Hidden Village premises without a warrant or notice.

92. Because Defendant's officials did not have probable cause, had no warrant and provided no advance notices required by law, they were denied entry and left.

93. Defendant Lakewood Police Department continued to attempt to intimidate YRP Hidden Village residents.

94. On May 23, 2007, an African-American Hidden Village tenant, dressed in a suit and waiting for a bus near the apartment, was approached by Lakewood police for no reason.

95. The tenant was instructed to approach the police cruiser and was required to produce ID which showed he was an employee of a Member of the United States Congress.

96. On June 1, 2007, Plaintiff Hidden Village LLC again wrote to the Defendants concerning the pattern and practice of coercion and intimidation on the basis of the race of some of the residents by using the police to further the intimidation.

97. Defendant Lakewood Building Department continued its harassment of the owners of Hidden Village Apartments by citing violations pertaining to the building they own next to Hidden Village. For example, in July, 2007, owners of Hidden Village were cited for a 3-foot hedge along the sidewalk on the building they own immediately next to Hidden Village. The hedge had been maintained at an approximately four (4) foot height since the building was purchased more than twenty (20) years ago.

98. Lakewood has no 3-foot hedge ordinance and neighborhood properties contiguous to Hidden Village have overt housing code violations.

99. Plaintiff and YRP African-American tenants continue to fear warrantless searches by Defendant's police and unannounced inspections by Defendant's building, housing, health, and fire officials, all designed to coerce these tenants to leave their residences at Hidden Village.

100. YRP African-American tenants are approached by police at nearby bus stops and are subjected to continued harassment and intimidation designed to coerce them to leave their residence at Hidden Village.

101. The young African-American population at Hidden Village is likely the largest concentration of African-Americans in Lakewood.

102. With a history of Fair Housing Act violations based on race, the City of Lakewood has done nothing to alleviate the fear of continuing intimidation and harassment.

103. This coercion by the Defendants interferes with the Plaintiff's right to rent without regard to race in violation of Section 818 of the Fair Housing Act.

104. The African-American tenants at Hidden Village Apartments are the only residents in Lakewood whom the Mayor has demanded them all to leave as a group.

105. Such conduct is in violation of the Plaintiff right to rent without regard to race, and has constituted an unlawful interference with the Plaintiff's business and rental activities.

106. Plaintiff Hidden Village LLC is struggling to keep residents because of racial intimidation and its ability to keep Hidden Village rented is directly affected by overtly racially motivated actions by Defendants and their officials under color of law.

107. Defendants' government-sponsored reign of terror motivated by race makes both Plaintiff Hidden Village LLC's task to keep tenants and Lutheran Metropolitan Ministry's mission to help young people profoundly more difficult.

108. The purpose and effect of Defendants' actions and policy have been to diminish, interfere with and/or otherwise make unavailable equal housing opportunities on account of race.

109. The acts and conduct of the Defendants were and continue to be knowing, intentional, malicious and in wanton and reckless disregard of federally secured and protected rights of fair housing.

110. Defendants were and continue to engage in a pattern and practice of official governmental conduct which includes, but is not limited to, (a) urging and coercing a "voluntary" mass exodus of African-American tenants from Hidden Village by Defendant George in his official and personal capacity (b) executing mass raids of units rented by African-American citizens (c) threatening the owners and program officials (d) insisting zoning non-compliance despite a unanimous finding of the planning commission from

which the Defendant took no appeal (e) using police power to intimidate individual residents without cause, and (f) attempting to intimidate the owners of Hidden Village by conducting building inspections and citing violations which are unfounded.

111. As a direct consequence and result of the acts and conduct of the Defendants, Plaintiff faces severe jeopardy to occupancy and jeopardy to the operation of its business.

112. As a direct consequence and result of the acts and conduct of the Defendants, Plaintiff Hidden Village LLC has suffered diminished value because its property is un-saleable while being a target of the Defendants illegal conduct, and while residents are being unlawfully targeted under color of law for denial of fair housing rights based on race.

113. The acts and conduct of the Defendants were and continue to be knowing, intentional, malicious and in wanton and reckless disregard of federally secured and protected rights of fair housing on account of race.

114. The purpose and effect of the acts and conduct of the Defendants were to, and continued to be, threatening, intimidating, coercive and otherwise designed to make providing equal housing opportunities unavailable to Plaintiff's prospective tenants on account of race.

COUNT II

115. Plaintiff reasserts the foregoing allegations and incorporates them by reference as if fully set forth herein.

116. Plaintiff has been denied equal housing opportunities on account of race.

117. Defendants have made statements or caused to have statements made which express a preference, limitation or discrimination based on race, attempted to deny housing on the basis of race, and otherwise making unavailable housing on the basis of race and/or interracial associations.

118. The acts and conduct of the Defendants were and continue to be knowing, intentional, malicious and in wanton and reckless disregard of federally secured and protected rights of fair housing of the Plaintiff on account of race.

119. Defendants were and continue to be fully aware that restricting Plaintiff in its practice of fair housing would result in the loss of income and frustrate its business.

120. The purpose and effect of the acts and conduct of the Defendants were and continue to be threatening, intimidating, coercive and otherwise making equal housing opportunities unavailable to the Plaintiff on account of race.

121. Such conduct by the Defendants has unlawfully interfered with the rental business of the Plaintiff and has otherwise tortiously interfered with

the contractual relations it has had and seeks to continue to have with YRP tenants.

COUNT III

122. Plaintiff reasserts the foregoing allegations and incorporates them by reference as if fully set forth herein.

123. Defendants' pattern and practice of entering upon the premises without consent, in the absence of probable cause and in the absence of warrants constitute trespass against the Plaintiff.

124. The acts and conduct of the Defendants were and continue to be knowing, intentional, malicious and in wanton and reckless disregard of state common law rights of the Plaintiff.

125. Defendants were and continue to be fully aware that their unlawful trespass onto Plaintiff's property is designed to restrict the Plaintiff in its practice of fair housing, and further designed to result in the loss of income and frustrate its business.

126. The purpose and effect of the acts and conduct of the Defendants were and continue to be threatening, intimidating, coercive and otherwise making equal housing opportunities unavailable to the Plaintiff on account of race.

WHEREFORE, Plaintiff urges this Court to grant the following relief:

A. Declare that the acts and conduct of the defendants, individually and collectively, constitute violations of Title VIII of the Civil Rights Act of 1968, the Fair Housing Act, 42 U.S.C. §§3601, *et seq.*, as well as violations of the anti-intimidation section of the Act, Section 818, 42 U.S.C. §3617; the Civil Rights Act of 1870, as amended, 42 U.S.C. §1981, and the Civil Rights Act of 1866, 42 U.S.C. §1982 and the Civil Rights Act of 1871, 42 U.S.C. §1983.

B. Pursuant to Rule 65 of the Federal Rules of Civil Procedure and Sections 813 and 818 of the Civil Rights Act of 1968, as amended, the Fair Housing Act, 42 U.S.C. §§ 3613 and 3617, permanently enjoin the defendants, their agents, employees and representatives from engaging in any future act of intimidation, coercion, and interfering with the rental activities of the Plaintiff, and to cease and desist further retaliatory conduct against the Plaintiff on account of race and/or interracial associations;

C. Direct that the defendants engage in necessary affirmative fair housing education to correct the effects of their unlawful discriminatory housing practices on the basis of race.

D. Grant to the Plaintiff and against the defendants, jointly and individually, compensatory damages in the amount in excess of twenty-five thousand dollars, jointly and severally, appropriate punitive and exemplary damages against the defendants, jointly and severally except for Defendant City of Lakewood, a statutory civil fine per violation of the Fair Housing Act against each defendant individually and all other relief as expressly provided by statute and all other relief as expressly provided by statute and rule including statutory reasonable attorney fees and costs of this action;

E. Grant any additional relief which the court deems just, equitable and in advance of the public interest.

s/Avery Friedman

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TRIAL BY JURY DEMANDED

Plaintiff demands trial by jury.

s/Avery Friedman

AVERY S. FRIEDMAN