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12 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
13 IN AND FOR THE COUNTY OF MARICOPA

14 THE STATE OF ARIZONA *ex rel.* TERRY
15 GODDARD, the Attorney General; and THE
16 CIVIL RIGHTS DIVISION OF THE ARIZONA
17 DEPARTMENT OF LAW,

18 Plaintiff,

19 v.

20 AIMCO Los Arboles, a Delaware limited
21 partnership, and AIMCO Properties, a Delaware
22 limited partnership,

23 Defendants.

No. CV2006-017701

COMPLAINT
(Non-classified Civil)

24 Plaintiff, the State of Arizona *ex rel.* Terry Goddard, the Attorney General, and the
25 Civil Rights Division of the Arizona Department of Law (collectively the "State"), for its
26 Complaint, alleges as follows:

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1 15. After the tour, Hayes expressed an interest in renting an apartment at the
2 complex. The Leasing Consultant asked Hayes if he wanted to place a deposit on an apartment,
3 at which time Hayes told the Leasing Consultant that he was on a fixed income due to his
4 disability.

5 16. At that time, Hayes told the Leasing Consultant that his current apartment
6 complex allowed Hayes to financially qualify using his parents as co-signers and asked
7 Defendants to offer a similar concession.

8 17. In response to Hayes' accommodation request, the Leasing Consultant asked
9 Hayes if he was a full-time college student. When Hayes responded that he was not, the
10 Leasing Consultant told Hayes that a co-signer was not an option because Defendants' rental
11 policy only allows full-time college students to use a co-signer.

12 18. Defendants' Community Manager confirmed the co-signer policy while Hayes
13 and his parents were at the property.

14 19. Hayes did not submit a rental application to Defendants because Defendants
15 clearly told him that the co-signer option was not available to him and, therefore, Hayes
16 reasonably believed in the finality of Defendants' decision that Defendants would not allow
17 him to utilize a co-signer.

18 20. At the conclusion of the State's investigation, the State determined that there was
19 reasonable cause to believe that Defendants violated the AFHA by refusing to reasonably
20 accommodate Hayes and refusing to even consider allowing Hayes to financially qualify
21 through a co-signer.

22 21. After his visit to the Los Arboles complex, Hayes wrote to Defendants at four
23 different email addresses and requested that Defendants allow Hayes to financially qualify for
24 an apartment using his parents as co-signers. Defendants failed to respond to that
25 accommodation request.

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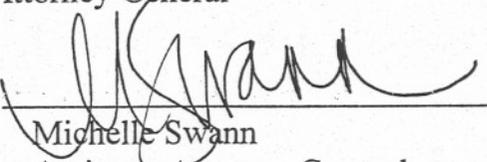
1 E. Order the State to monitor Defendants' future compliance with the AFHA.

2 F. Award the State its costs incurred in bringing this action, including its attorneys'
3 fees and costs, and its costs in monitoring Defendants' future compliance with the AFHA.

4 G. Grant such other and further relief as this Court may deem just and proper in the
5 public interest.

6 Dated this 17th day of November, 2006.

7 TERRY GODDARD
8 Attorney General

9
10 By 

Michelle Swann
Assistant Attorney General
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