

1. This is a civil rights case brought by African American residents of Baltimore's family public housing, on behalf of themselves and more than 12,500 similarly situated families, as well as the tens of thousands of families who for decades to come will live in Baltimore's public housing.

2. The plaintiffs ask this Court to halt the defendants' policies and practices that deliberately created and perpetuated systemic racial segregation in Baltimore's family public housing, and to require them to eliminate the vestiges of unlawful segregation "root and branch".

3. Baltimore's public housing system was established in the mid-1930's as an officially segregated program. From 1934 to 1954, housing projects were planned and operated as exclusively "white housing" or "Negro housing". The housing projects designed as de jure segregated housing still form the core of Baltimore's public housing. Three quarters of the public housing units in use today were built or planned as de jure segregated housing.

5. The defendants have carried out a deliberate policy to deny African Americans admission to white neighborhoods by confining placement of public and assisted housing sites to areas adjacent to existing concentrations of public housing. Defendants have repeatedly acquiesced to white opposition to placement of public housing projects in white neighborhoods by delaying or abandoning the development of public and assisted housing in predominately white areas.

6. The defendants' tenant assignment policies further denied African Americans admission to white neighborhoods and continue to confine minority families to segregated housing in segregated neighborhoods. As the result, the formerly de jure segregated "Negro housing" projects remain single race black projects to this day. At the same time, the defendants' tenant assignment policies have consolidated white families in two formerly de jure segregated "white housing" projects that remain predominately white.