

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CARMEN THOMPSON, et al.

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Plaintiffs

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vs.

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Civil Action No. MJG 95-309

THE UNITED STATES DEPARTMENT
OF HOUSING AND URBAN
DEVELOPMENT, et al.

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AMENDED AND
CLASS ACTION COMPLAINT

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Defendants.

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.