

**IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO**

<b>OHIO CIVIL RIGHTS COMMISSION</b>	:	<b>CASE NO.:</b>
30 East Broad Street, 5 <sup>th</sup> Floor	:	
Columbus, Ohio 43215	:	
	:	
Plaintiff,	:	<b>JUDGE</b>
	:	
-vs-	:	
	:	<b>Complaint with Jury Demand</b>
<b>SUMMIT PROPERTY INVESTMENTS, LLC</b>	:	<b>Endorsed Hereon</b>
c/o Jefferson Satterfield, Statutory Agent	:	
3065 Woodcrest Drive	:	<b>(Other Civil - Housing Discrimination)</b>
Fairlawn, Ohio 44333	:	
	:	
Defendant.	:	

---

Plaintiff, the Ohio Civil Rights Commission (“Plaintiff”), by and through its counsel, the Attorney General of Ohio, files its Complaint against Summit Property Investments, LLC (“Defendant”). Defendant has engaged in a pattern of unlawful discriminatory conduct in violation of R.C. 4112.02(H).

**PARTIES AND VENUE**

1. Plaintiff is an agency and instrumentality of the State of Ohio, created by R.C. 4112.03, and charged with the enforcement of certain laws against discrimination.
2. Summit Property Investments, LLC (“Defendant”) is a for-profit Limited Liability Corporation authorized to do business in Ohio.
3. Defendant, at all times relevant to this Complaint, owned and/or managed residential rental properties in Summit County, Ohio, including a unit located at [REDACTED] Ada Street, Akron, Ohio 44306 (the “Property”).

4. Venue is proper in the Summit County Court of Common Pleas under Civ.R. 3(C) and R.C. 4112.055(A)(2).

#### **PROCEDURAL AND JURISDICTIONAL ALLEGATIONS**

5. Defendant is a “person,” as defined by R.C. 4112.01(A)(1), and a provider of “housing accommodations,” as defined by R.C. 4112.01(A)(10).
6. The Property is a “housing accommodation,” as defined by R.C. 4112.01(A)(10).
7. [REDACTED] is an “aggrieved person,” as defined by R.C. 4112.01(A)(23)(a).
8. On May 21, 2023, [REDACTED] submitted a charge to Plaintiff alleging unlawful discriminatory practices based on race and familial status.
9. Plaintiff investigated [REDACTED] charge in accordance with R.C. 4112.05(B)(2).
10. On October 26, 2023, as a result of its investigation, Plaintiff determined that it was probable that Defendant had engaged in unlawful discriminatory practices.
11. Plaintiff notified [REDACTED] and Defendant of its probable determination by mailing a Letter of Determination on October 26, 2023.
12. Before issuing an administrative complaint, Plaintiff attempted informal methods of conciliation with Defendant pursuant to R.C. 4112.05(B)(4).
13. Plaintiff’s attempts to conciliate the matter failed.
14. Based on its finding of probable cause and the failure of conciliation related to the charge, Plaintiff issued administrative Complaint No. 23-HOU-AKR-42605 pursuant to R.C. 4112.05 against Defendant.
15. Defendant exercised its right to elect to have the discriminatory practices alleged in Complaint No. 23-HOU-AKR-42605 addressed in a civil action pursuant to R.C. 4112.055(A)(2)(a).

16. On August 15, 2024, Plaintiff authorized the Office of the Attorney General to commence a civil action to address the matters raised in Complaint 23-HOU-AKR-42605 in the Common Pleas Court of Summit County, pursuant to R.C. 4112.055(A)(2)(b).

### FACTUAL ALLEGATIONS

17. Defendant owned the Property from September 11, 2014, until February 27, 2024.
18. Jefferson Satterfield (“Satterfield”) is a person and member of Summit Property Investments, LLC.
19. At all times relevant, Satterfield managed the Property on behalf of Defendant.
20. [REDACTED] began renting the Property from Defendant on October 1, 2019.
21. [REDACTED] is African American and a mother to minor children.
22. [REDACTED] minor children lived with her at the Property during her tenancy.
23. [REDACTED] participated in the Housing Choice Voucher Program (the “Voucher Program”), as administered by the Akron Metropolitan Housing Authority (“AMHA”).
24. The Voucher Program subsidized [REDACTED] rental payments and required certain terms and conditions for housing.
25. Under the Voucher Program, participants may transfer their housing voucher to another housing provider if the tenant submits a Request-to-Move form and qualifies for a voucher.
26. In March of 2023, [REDACTED] asked Satterfield to sign a Request-to-Move form.
27. The Request-to-Move form requires a housing provider’s signature to allow a Voucher Program participant to transfer a housing voucher elsewhere.
28. Satterfield refused to sign the Request-to-Move form.
29. Via text message, [REDACTED] requested an explanation from Satterfield for his refusal to sign the Request-to-Move form.

30. Satterfield replied to [REDACTED] stating that he would not sign the Request-to-Move form “simply because your [sic] black.”
31. Satterfield made statements to [REDACTED] about her children, saying her son “won’t graduate high school,” “is an idiot,” that “he will either impregnate do [sic] girl or end up in prison doing hard time for selling drugs,” and adding “you and your kid gets [sic] to go... [e]specially your big mouthed kid.”
32. Satterfield made other statements to [REDACTED] calling her “stupid bitch,” “stupid,” “an ignorant bitch,” “moron,” “life loser,” and declaring that “[REDACTED] is] living exactly we’re [sic] god wants [her] to live try getting an education.”
33. Satterfield insinuated that, if [REDACTED] “wanted to keep [her] landlord happier and not interested in evicting [her],” she should not associate with his other tenant(s).
34. Satterfield threatened to “bounce [REDACTED] ass out,” and evict her.
35. When [REDACTED] made her intent to move clear, Satterfield threatened to call the children services board.
36. Satterfield also threatened to contact AMHA and endanger [REDACTED] housing voucher, stating “maybe they cancel out your assistance”.
37. [REDACTED] reported Satterfield’s statements to AMHA and requested that she be released from her lease due to Satterfield’s behavior.
38. On or about June 6, 2023, AMHA terminated the rental agreement with Defendant.
39. [REDACTED] left the property on June 30, 2023.

**COUNT I – UNLAWFUL CONDUCT ON THE BASIS OF RACE AND FAMILIAL  
STATUS PURUSANT TO R.C. 4112.02(H)(4)**

40. The previous paragraphs are adopted as if fully re-written herein.

41. [REDACTED] asked Defendant to sign a Request-to-Move form, in accordance with the terms and conditions of her rental of the Property through the Voucher Program.
42. Satterfield refused to sign a Request-to-Move form because of [REDACTED] race.
43. Satterfield made insulting and derogatory comments to [REDACTED] about her children based on racial stereotypes.
44. Satterfield made insulting and derogatory comments to [REDACTED] which reflected his animus towards her because of race and familial status.
45. Satterfield's comments to [REDACTED] were unwelcome.
46. Satterfield's comments to [REDACTED] interfered with her use and enjoyment of the Property.
47. Defendant discriminated against [REDACTED] in the terms or conditions of renting and/or leasing the Property because of [REDACTED] race and familial status.

**COUNT II – UNLAWFUL CONDUCT ON THE BASIS OF RACE AND FAMILIAL STATUS PURSUANT TO R.C. 4112.02(H)(7)**

48. The previous paragraphs are adopted as if fully re-written herein.
49. Satterfield made statements that he did not intend to comply with [REDACTED] request to sign a Request-to-Move form because of her race.
50. Satterfield made insulting and derogatory statements to [REDACTED] about her children perpetuating racial stereotypes.
51. Satterfield made statements indicating that he wanted [REDACTED] and her son to leave the property.
52. Defendant circulated or caused a statement to be made related to the rental or lease of the Property that indicated a preference, limitation, specification, and/or discrimination based

upon race and familial status, or an intention to make such a preference, limitation, specification, or to discriminate based on race and familial status.

**PRAYER FOR RELIEF**

**THEREFORE**, Plaintiff respectfully requests this Court:

- A. Determine and adjudge that Defendant has committed unlawful discriminatory practices in violation of R.C. 4112.02(H);
- B. Issue an injunction permanently restraining and enjoining Defendant from engaging in unlawful discriminatory practices;
- C. Order Defendant to pay [REDACTED] actual and compensatory damages;
- D. Order Defendant to pay punitive damages in an amount yet to be determined;
- E. Order Defendant to pay Plaintiff's reasonable attorney fees and court costs incurred in the prosecution of this action, expert witness fees, if any, and all other litigation expenses; and

- F. Award further remedial relief, including, but not limited to, training, policy provisions, posting, advertising, and all relief that the Court determines to be just and proper.

Respectfully submitted,

DAVE YOST  
Attorney General of Ohio

/s/ Isaac M. Bleich

Isaac M. Bleich (0102532)  
Assistant Attorney General  
Sharon D. Tassie (0029896)  
Assistant Section Chief  
Civil Rights Section  
615 West Superior Avenue, 11<sup>th</sup> Floor  
Cleveland, Ohio 44113  
Telephone: (216) 787-3046  
Facsimile: (855) 527-1580  
[Isaac.Bleich@OhioAGO.gov](mailto:Isaac.Bleich@OhioAGO.gov)  
[Sharon.Tassie@OhioAGO.gov](mailto:Sharon.Tassie@OhioAGO.gov)

*Counsel for Ohio Civil Rights Commission*

### **JURY DEMAND**

Plaintiff requests a jury to hear the claims in the instant Complaint.

/s/ Isaac M. Bleich

ISAAC M. BLEICH (0102532)  
Assistant Attorney General  
Civil Rights Section