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**FILED**

*AWL 26 2010*  
AUG 26 2010

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

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

George Willborn, Peytyn Willborn, Willborn §  
Male Minor Child and Teara Hill/Willborn, §

Plaintiffs, §

v. §

Daniel Sabbia, Adrienne Sabbia, §  
Jeffrey Lowe, The Lowe Group Chicago, Inc., §  
and Midwest Realty Ventures, LLC d/b/a §  
Prudential Rubloff Properties §

Defendants. §

1:10-cv-05382  
Judge Samuel Der-Yeghiayan  
Magistrate Judge Nan R. Nolan

**JURY TRIAL REQUESTED**

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**PLAINTIFFS' ORIGINAL COMPLAINT**

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COME NOW, GEORGE WILLBORN, PEYTYN WILLBORN, the WILLBORN MALE CHILD AND TEARA HILL/WILLBORN, (collectively "Plaintiffs") in the above matter and make this their Original Complaint as follows:

**I.**

**PARTIES**

1.01 GEORGE WILLBORN, is an African-American individual resident of Chicago, Illinois who can receive notice through his counsel, belowsigned.

1.02 PEYTYN WILLBORN is an African-American individual resident of Chicago, Illinois who can receive notice through her counsel, belowsigned.

- 1.03 WILLBORN MALE MINOR CHILD is a 12-year-old male child who is an African-American individual resident of Chicago, Illinois who can receive notice through his counsel, belowsigned.
- 1.04 TEARA HILL/WILLBORN is a 19-year-old female child of the Willborns who is an African-American individual resident of Chicago, Illinois and who can receive notice through her counsel, belowsigned.
- 1.05 DANIEL SABBIA, is an individual resident of Chicago, Illinois who can receive service of process at his home, 3300 South Normal Street, Chicago, Illinois 60616.
- 1.06 ADRIENNE SABBIA is an individual resident of Chicago, Illinois who can receive service of process at her home, 3300 South Normal Street, Chicago, Illinois 60616
- 1.07 JEFFREY LOWE, in an individual resident of Chicago, Illinois who is a Realtor and Real Estate Agent licensed to do business in the state of Illinois and can receive summons at 401 South LaSalle Street, Suite 606, Chicago, Illinois 60605 or by and through counsel Michael S. O'Connell, O'Connell and Ryan, 161 North Clark Street, Suite #2500, Chicago, Illinois 60601.
- 1.08 THE LOWE GROUP CHICAGO, INC., is a corporation with its principal place of business in Chicago, Illinois, which can receive service of process by and through its registered agent, Thomas J. Dwyer, Registered Agent, 401 South LaSalle Street, Suite 606, Chicago, Illinois 60605
- 1.09 MIDWEST REALTY VENTURES, LLC D/B/A/ PRUDENTIAL RUBLOFF PROPERTIES AND PRUDENTIAL RUBLOFF is an Illinois Limited Liability

Company which can receive service of process through its registered agent, Karl L. Felbinder, Registered Agent, 1340 Shermer Road, Suite 201, North Brook, Illinois 60062

## II.

### JURISDICITON AND VENUE

- 2.01 This suit is brought under Federal Question Jurisdiction, Federal question 28 USC §1331, and over all other causes of action under the supplemental jurisdiction of this Court authorized by 28 USC §1367(a).
- 2.02 Venue of the matter is proper as all Plaintiffs and Defendants live or have their principal places of business within the confines of the Northern District of Illinois, Eastern Division and all or a substantial part of the events giving rise to suit occurred in the Northern District of Illinois, Eastern Division, 28 USC §1391(a).
- 2.03 On or about January 28, 2010, Plaintiffs George and Peytyn Willborn and Dylcia Cornelious filed a verified complaint with the United States Department of Housing and Urban Development ("HUD"), alleging that Defendants Daniel and Adrienne Sabbia, Jeffrey Lowe, and The Lowe Group/Prudential Rubloff violated the Fair Housing Act as amended in 1988, 42 U.S.C. Section 3601, *et seq.* (the "Act"), by refusing to sell to or otherwise making unavailable to the Willborns a dwelling, on the basis of George and Peytyn Willborns' race and that of their children and for indicating that intention all in violation of 42 U.S.C. §3604(a), (b), and §3605 of the Act. On January 28, 2010, HUD Office of Fair Housing and Equal Opportunity ("FHEO") requested a waiver of jurisdiction from the Illinois Department of Human Rights ("IDHR") so that the matters could be investigated as one. On January 29, 2010, the Executive Director of the Illinois

Department of Human Rights, Rocco Claps, so approved.

- 2.04 On or about March 19, 2010, Plaintiffs also filed an amended verified complaint with HUD, to remove the allegation of discriminatory financing, to replace as respondents the Lowe Group/Prudential Rubloff with The Lowe Group Chicago, Inc., and to add Midwest Realty Ventures, LLC d/b/a Prudential Rubloff Properties as a respondent. On or about July 14, 2010, Complainants filed another amended, verified complaint re-alleging the 42 U.S.C. §3605 claim and adding a 42 U.S.C. §3617 interference claim to the existing claims.
- 2.05 Reasonable cause was determined by HUD, see 42 U.S.C. §3610(g)(1) and (2). The FHEO determined that reasonable cause existed to believe that a discriminatory housing practice has occurred in this case based on race and authorized HUD to proceed with the issuance of a Charge of Discrimination.
- 2.06 On August 9, 2010, the General Counsel of HUD issued said charge against Jeffrey Lowe, The Lowe Group Chicago, Inc., Daniel Sabbia, Adrienne Sabbia, and Midwest Realty Ventures, LLC, alleging unlawful discrimination against George and Peytyn Willborn and Dylica Cornelious by otherwise making a dwelling unavailable to the Willborns as Buyers because of the Willborns' race, African-American and for giving oral intent to do so all in violation of 42 U.S.C. § 3604. Further, the allegations were that by refusing to sell to the Willborns after they made a bona fide offer and by taking the subject property off the market, the Sabbias interfered with Cornelious because she was the Willborns' Realtor and therefore aided and encouraged the Willborns in the exercise and enjoyment of the rights granted and protected by Fair Housing Laws and also as she

was entitled to a commission but for the unfair acts of the Respondents, see 42 U.S.C. § 3617.

- 2.07 Pursuant to 42 U.S.C § 3612(a); 24 C.F.R. § 180.410(b)(2), within the time frames allowed, the Plaintiffs on August 20, 2010 elected to have the claims asserted in the charge decided in a civil action under section 812(o) of the Fair Housing Act, 42 U.S.C. § 3612(o) in lieu of an administrative proceeding. Thus, this action.
- 2.08 In addition, the Plaintiffs assert claims under 42 USC §§1981 and 1982 and under the Illinois Human Rights Act, 775 ILCS 5 / Article 3, 3-101, et.seq.

### III.

#### GENERAL FACTS

- 3.01 In this matter, George, Peytyn Willborn and the Willborn Children are collectively referred to as the "Willborns" or "Willborn Plaintiffs". Dylcia Cornelious, the real-estate agent of the Willborns is referred to herein as "Cornelius". Adrienne and Daniel Sabbia are referred to collectively as the "Sabbias" or "Sabbias Defendants". Jeffery Lowe, The Lowe Group Chicago, Inc., and Midwest Realty Ventures, LLC d/b/a Prudential Rubloff Properties are collectively referred to as "Lowe" or the "Lowe Defendants".
- 3.02 At all times relevant, the Sabbias, a white married couple, owned the property located at 3300 South Normal Avenue, Chicago, Illinois 60616 ("subject property"), a five bedroom, 8000 square foot, single-family home. The subject property is located in the Bridgeport neighborhood of Chicago, Illinois.
- 3.03 On information and belief, Respondent Daniel Sabbia's sister and brother-in-law reside in the property directly next door to the subject property at 3304 South Normal Avenue and

other family lives in the same Bridgeport neighborhood and general area.

- 3.04 At all times relevant hereto, Jeffery Lowe of The Lowe Group Chicago, Inc. was the listing agent for the subject property and worked as a real estate agent for Midwest Realty Ventures, LLC d/b/a Prudential Rubloff Properties (the listing broker for the subject property). As these persons and entities acted together in concert and under the authority of one another in the facts leading to the allegations herein they are referred to here collectively for all purposes. Jeffery Lowe was the sole officer, director and shareholder of the sham of a corporate fiction, The Lowe Group Chicago, Inc., or otherwise controlled said entity and was wholly responsible for its actions; further The Lowe Group Chicago, Inc. and Jeffery Lowe acted as agent under the brokerage of Midwest Realty Ventures, LLC d/b/a Prudential Rubloff Properties which is responsible for the actions and inactions of both under the auspices of actual or apparent authority and/or license.
- 3.05 George and Peytyn Willborn are an African-American married couple. At all times relevant to this charge, they resided with their son and daughter who are also aggrieved persons, pursuant to 42 U.S.C. §3602(i); 775 ILCS 5/3-101(E).
- 3.06 In or around January 2008, the Sabbias retained Lowe's services to list, market and sell the subject property.
- 3.07 The Sabbias told Lowe that they would prefer not to sell the subject property to an African-American, thereby orally indicating an intent to discriminate and violate Federal and Illinois State housing laws.
- 3.08 Lowe instructed the Sabbias that the restriction was a violation of those laws.
- 3.09 On or about January 8, 2008, the Sabbias listed the subject property for sale for 1.99

- million dollars. On April 6, 2009 after having briefly removed the house, the Sabbias relisted with Lowe the subject property at a reduced list price of 1.799 million dollars.
- 3.10 In January 2010, when the Willborns viewed the subject property, it was listed for 1.799 million dollars and had been on the market for the greater part of two years.
- 3.11 In or around January 2010, the Willborns retained Cornelious to help them locate a newer construction, approximately 5,000 to 8,000 square foot single family home near downtown Chicago. On or about January 2, 2010, Willborn Plaintiffs and Cornelious toured the subject property.
- 3.12 On January 2, 2010, the same day as the showing, the Willborn Plaintiffs made an offer on the subject property for 1.5 million dollars with \$75,000 in earnest money and a closing date of February 25, 2010.
- 3.13 Over the course of the next few days, negotiations over the subject property ensued. The Sabbias, through Lowe, countered with 1.75 million dollars and a later closing date.
- 3.14 On January 3, 2010, the Willborns offered 1.65 million dollars and requested that the Sabbias leave the televisions in the theater and living rooms.
- 3.15 On January 4, 2010, Lowe conveyed the Sabbias' final counteroffer to Cornelious of 1.7 million dollars with an April 1, 2010 closing date. Later that day, Cornelious conveyed to Lowe the Willborns' acceptance of the Sabbias' counteroffer and prepared a sales contract for signature. 3.16
- 3.16 On January 4, 2010, Cornelious informed Lowe that George Willborn was a radio personality to illustrate that the Willborn Plaintiffs were qualified buyers.
- 3.17 Lowe indicated that his buyers, who had previously indicated their desire not to sell to

African-Americans, had researched George Willborn on the internet. As of that day, and at the time of the filing of this complaint, upon entry of the name "George Willborn" into Google, Yahoo and MSN/Bing (encompassing approximately 94% of all internet searches in the United States in January 2010 per comscore.com, NASDAQ: SCOR) the responses included photographs of George Willborn, clearly indicating he is an African-American (Exhibit A, B and C<sup>1</sup>).

- 3.18 The Willborns were highly qualified to buy the subject property.
- 3.19 On January 5, 2010, Respondent Lowe forwarded the contract, containing the terms to which the Willborns and Sabbias had agreed, to the Sabbias for signature.
- 3.20 For many days, the Sabbias failed to indicate the agreement was incorrect in any particular, failed to counter-offer, and wholly failed to respond.
- 3.21 On January 9, 2010, Cornelius told Lowe to tell the Sabbias, and Lowe did indicate to the Sabbias, the concern that the failure to respond was due to the Willborns' race, African-American and that their actions were a violation of Fair Housing Laws.
- 3.22 On January 11, 2010, Lowe disclosed to Cornelious that the Sabbias would not sign the sales contract and that they were taking the subject property off of the market.
- 3.23 Lowe gave several pretextual reasons for why the Sabbias decided not to sell, which included that Respondent Adrienne Sabbia had changed her mind about moving, the Sabbias could not find a suitable new home to move to and they wanted to keep their children in their current schools, without indication as to why the house had been on the market to that point, why the Sabbias Defendants had negotiated to an agreeable sale

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<sup>1</sup> We also note that now there are references to the instant complaint. Those are of no moment here.

price and terms among other matters not explaining the Willborns and Sabbias' agreement was not reduced to writing after the internet search.

- 3.24 Later, in interview with officials of the United States Government at HUD, the Sabbias indicated but another pretextual reason for pulling the house off the market, that they wanted the full asking price of 1.799 million dollars. Of course there was no explanation that as the sale price had been agreed at 1.7 million dollars, why reviewing George Willborn's picture on the internet has suddenly caused this desire or why it was that this desire was not communicated to the Willborns.
- 3.25 On or about January 12, 2010, on Lowe's advice, the subject property was taken off the market.
- 3.26 On or about February 1, 2010, the Sabbias and Lowe received the HUD complaints filed on January 28, 2010 by the Plaintiffs.
- 3.27 Almost immediately after, the receipt of the complaints, Lowe transmitted the Sabbias new demand of 1.799 million dollars (and added in all furnishings at the subject property).
- 3.28 On or about March 8, 2010, Respondent Lowe relisted the subject property at the asking price of 1.799 million dollars.
- 3.29 The Defendants, and each of them in concert and singularly, have violated Federal and State Housing Laws and anti-discrimination laws.
- 3.30 The Willborns have been subject to losses related to not being able to purchase, as the agreed price, the subject property. They have had to carry the financial burdens of searching for another home and all costs appurtenant thereto. They and their children

have been subjected to the emotional and physical harms of this discrimination. They cannot have the peace to enjoy the fruits of their labor, a chance to live in the home they selected or in the neighborhood they selected. They cannot feel comfortable in the home or the neighborhood they selected. They have suffered the embarrassment of victimization of discrimination that goes to the very core of their beings. They have been forced to file complaints and engage counsel with the attorneys' fees, costs and expenses that go along with them. In short, As a result of Defendants' discriminatory conduct, George and Peytyn Willborn have suffered damages, including economic loss, emotional distress, inconvenience, and a lost housing opportunity.

- 3.31 As a result of Respondents' discriminatory conduct, the Willborns' children have suffered damages, including a lost housing opportunity and emotional distress. The children were disappointed at the loss of certain features of the house, and the felt fear because of how they might be treated because of race. The Willborns' daughter felt hurt and angry and now worries that if this happened to her parents that it may happen to her one day in her own search for housing as an adult.
- 3.32 Cornelious has been subject to losses related to not being able to finalize and facilitate the purchase and to earn a commission from the purchase. She has been vilified for bring the violation of law to the attention of the Defendants and HUD. She has been subjected to the emotional and physical harms of this discrimination. She also cannot have the peace to enjoy the fruits of her. Her ability to list and sell properties in the neighborhood of the subject property has been effected. She has been forced to file complaints and engage counsel with the attorneys' fees, costs and expenses that go along with them. In short,

she has been damaged by the acts of the Defendants herein.

**IV.**

**CAUSES OF ACTION OF GEORGE WILLBORN, PEYTON WILLBORN AND  
WILLBORN CHILDREN AS AGAINST THE SABBIA DEFENDANTS**

4.01 As to each of the counts below, the Willborns incorporate by reference Paragraphs in section III above.

***Count 1***

4.02 It is unlawful to discriminate, on the basis of race, against any person in the making of contracts. 42 USC §1981. The Sabbias Defendants, by failing to finalize the contract of sale of the subject property because of the race of the Willborns, have violated 42 USC §1981.

***Count 2***

4.03 It is unlawful to discriminate, on the basis of race, against any person in the free purchase, holding and conveyance of real property. 42 USC §1982. The Sabbias Defendants, by discriminating against the Willborns in the free purchase, holding and conveyance of real property have violated 42 USC §1982.

***Count 3***

4.04 It is unlawful to refuse to sell after the making of a bona fide offer, or to refuse to negotiate for the sale, otherwise make unavailable or deny, a dwelling to any person because of race or to publicize the intent orally or in writing any limitation of negotiation, offer or availability because of race. 42 U.S.C. §3604(a); 775 ILCS 5/3-103(A-F). By so refusing to sell and negotiate and by removing from sale the property due to race, and further by orally stating the intent to do so, the Sabbias Defendants have violated both

Illinois and Federal law.

- 4.05 By taking the subject property off the market, the Sabbias Defendants committed unlawful discrimination by making the subject property unavailable to the Willborns because of their race in violation of 42 U.S.C. §3604(a) and 775 ILCS 5/3-103(A-F).
- 4.06 By refusing to sign the sales contract, Sabbias Defendants committed unlawful discrimination against the Willborns by refusing to sell a dwelling to them after the making of a bona fide offer because of their race, African-American, in violation of 42 U.S.C. §3604(a) and 775 ILCS 5/3-103(A-F).

***Count 4***

- 4.07 By refusing to sell to Complainants George and Peytyn Willborn after they made a bona fide offer and by taking the subject property off the market, Respondents Daniel and Adrienne Sabbia interfered with the Willborns in the exercise or enjoyment of a right granted or protected by the Act in violation of 42 U.S.C. §3617 and 775 ILCS 5/3-103(A-F).

**V.**

**CAUSES OF ACTION OF GEORGE WILLBORN, PEYTON WILLBORN AND  
WILLBORN CHILDREN AS AGAINST THE LOWE DEFENDANTS**

- 5.01 As to each of the counts below, the Willborns incorporate by reference Paragraphs in section III above.

***Count 5***

- 5.02 By conveying to Cornelious that the Sabbias refused to sign the sales contract and facilitating the subject property's removal from the market, the Lowe Defendants committed unlawful discrimination against the Willborns by otherwise making a dwelling

unavailable because of the Willborns' race in violation of 42 U.S.C. §3604(a) and 775 ILCS 5/3-103(A-F).

***Count 6***

- 5.03 It is unlawful for any person or other entity whose business includes engaging in residential real-estate-related transactions to discriminate against any person in making available such a transaction or in the conditions of such a transaction because of race. Residential real-estate-related transaction means the selling, brokering, or appraising of residential real property. 42 U.S.C. §3605(a),(b)(2); 775 ILCS 5/3-103(G). By facilitating and acquiescing in the actions of the Sabbias Defendants, the Lowe Defendants violated the above Illinois and Federal Laws.
- 5.04 By taking the subject property off the market and conveying the Sabbias' refusal to sell, the Lowe Defendants discriminated against the Willborns by making unavailable a residential real-estate-related transaction because of their race, African-American, in violation of 42 U.S.C. §3605 and 775 ILCS 5/3-103(A-F).

***Count 7***

- 5.05 By conveying the Sabbias' refusal to sell after the Willborns made a bona fide offer and by taking the subject property off the market, the Lowe Defendants interfered with the Willborns in the exercise or enjoyment of a right granted or protected by the Act in violation of 42 U.S.C. §3617 and 775 ILCS 5/3-103(A-F).

***Count 8***

- 5.06 As Realtor, Broker and/or Real Estate Professional, the Lowe Defendants had obligations of full disclosure of the intent of the Sabbias Defendants to discriminate, had the

obligation to warn the Sabbias Defendants not to discriminate, had the obligation to warn the Plaintiffs of the Sabbias Defendants to discriminate and ultimately had the obligation to withdraw from representation. The Lowe Defendants failed in all of such matters and therefore breached those obligations actually and proximately causing the damages of the Willborn Plaintiffs. As such, the Lowe Defendants are negligent.

**VI.**

**CONSPIRACY**

***Count 9***

6.01 In all things, the Defendants herein acted in concert by meeting of the minds to further an illegal purpose or to further a legal purpose by illegal means. As such, the Defendants, in whole, or alternatively in part acted in conspiracy to violate the state and federal laws and to breach the duties set out hereinabove. As such, the Defendants are liable jointly and severally for the allegations made.

**VII.**

**RESPONDEAT SUPERIOR**

***Count 10***

7.01 At all times herein, Jeffrey Lowe acted as an employee of the Jeff Lowe Group Chicago, Inc. and was fully within the course and scope of his employee. Jeffery Lowe Group, Chicago, Inc. is liable for the actions and inactions of Jeffery Lowe and its other employees.

7.02 At all times herein, Jeffrey Lowe and the Jeff Lowe Group Chicago, Inc. acted pursuant to direction, license and /or franchise of Midwest Realty Ventures, LLC d/b/a Prudential Rubloff Properties, and subject to the brokerage and control of same. Midwest Realty

Ventures, LLC d/b/a Prudential Rubloff Properties is liable for the actions and inactions of Jeffery Lowe, Jeffery Lowe Group, Chicago, Inc and their other employees.

**VIII.**

**DAMAGES**

8.01 The Defendants are liable to the Plaintiffs for actual damages, (alternatively, nominal damages), exemplary damages as allowed by law, attorneys fees, expenses and costs of court.

**IX.**

**CONCLUSION AND PRAYER**

WHEREFORE, the Plaintiffs seek damages as against the Defendants as follows:

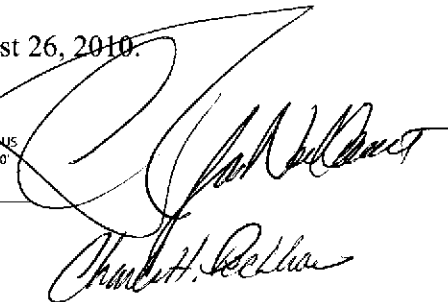
- A. Awards such damages as will fully compensate the Willborns and the Willborns' children, aggrieved persons, for their actual damages caused by Defendants' discriminatory conduct pursuant to state and federal law.
- B. Awards a civil penalty against each Defendant for each violation of the Act committed pursuant to 42 U.S.C. §3612(g)(3).
- C. Awards exemplary/punitive damages as allowed by law,
- D. Awards attorneys fees, expenses and costs of court.
- E. All relief in law and in equity to which the Plaintiffs show themselves justly entitled.

Respectfully submitted on August 26, 2010.

Neil Ament

Digitally signed by Neil Ament  
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**SUMMONS TO:**

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[www.willbornsworld.com/](http://www.willbornsworld.com/) - Cached - Similar

**George Willborn wanted to live in Bridgeport. Huh? - Mary Mitchell**

Aug 11, 2010 ... That was my reaction to the news that comedian **George Willborn** was denied an opportunity to buy a \$1.7 million house in Bridgeport. ...

[blogs.suntimes.com/mitchell/2010/.../george\\_willborn\\_wanted\\_to\\_live\\_1.html](http://blogs.suntimes.com/mitchell/2010/.../george_willborn_wanted_to_live_1.html)

**WHUR > George Willborn**

Since his first appearance on stage in 1987, **George Willborn** has brought laughter to the masses with his "no holds barred" approach to telling the truth ...

[www.whur.com/georgewillborn](http://www.whur.com/georgewillborn) - Cached - Similar

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Videos for **George Willborn**



**George Willborn - Def**

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**George Willborn - Def**

Comedy Jam

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**George Willborn - Growing Up - Video Clip | Comedy Central's Jokes.com**



Jokes.com video - **George Willborn** grew up poor and happy.

[comedians.jokes.com/george-willborn/.../george-willborn---growing-up](http://comedians.jokes.com/george-willborn/.../george-willborn---growing-up) - Cached - Similar

**Chicago Couple Charged in HUD Race Complaint, Housing ...**

Aug 12, 2010 ... **George** and **Peytyn Willborn** are understandably angry that the dream house they planned to buy was suddenly pulled off the market. ...

[abcnews.go.com/Business/chicago-couple-charged-hud-race.../story?id...](http://abcnews.go.com/Business/chicago-couple-charged-hud-race.../story?id...)

**George Willborn: What you see is what you get**

**George Willborn** has been making Chicagoans laugh for two decades. His loyal supporters tune in every weekday to hear him on the nationally syndicated ...

[www.chicagodefender.com/article-3892-george-willborn-what-you-see-is-what-you-get.html](http://www.chicagodefender.com/article-3892-george-willborn-what-you-see-is-what-you-get.html) - Cached - Similar

**MySpace - George (www.willbornsworld.com) - 38 - Male - CHICAGO ...**

26 posts - 22 authors - Last post: Jul 9

**George Willborn**, The Stress Reliever Is In...No Appointments Necessary! Male 38 years old. CHICAGO, Illinois United States ...

[www.myspace.com/georgewillborn](http://www.myspace.com/georgewillborn) - Cached - Similar

**House MC George Willborn - Time Out Chicago** 

Host with the most. House MC **George Willborn** has all the right jokes, hits all the right notes. Article in Time Out Chicago Comedy.

[chicago.timeout.com/articles/.../house-mc-george-willborn](http://chicago.timeout.com/articles/.../house-mc-george-willborn) - Cached - Similar

**George Willborn** 

Self: "Family Reunion: Episode dated 18 May 2008". Visit IMDb for Photos, Filmography, Discussions, Bio, News, Awards, Agent, Fan Sites.

[www.imdb.com/name/nm1139342/](http://www.imdb.com/name/nm1139342/) - Cached - Similar

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Filed under: [News](#) , [Politics](#) , [Race and Civil Rights](#) Serious charges of racial discrimination have been laid out against a...

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