

**CONNECTICUT COMMISSION ON HUMAN RIGHTS  
AND OPPORTUNITIES**

Barbara Capri	:	Case No.
	:	
Complainant	:	
	:	
v.	:	
	:	
Barbara Louise Blauvelt, TR	:	
Barbara Louise Blauvelt Revocable Trust	:	
	:	
Respondents	:	

**COMPLAINT**

1. Barbara Capri (“Ms. Capri”) is a natural person who resides at 10 Robinson Avenue, Danbury, CT 06810.
2. Ms. Capri is a participant in the Housing Choice Voucher program, commonly known as Section 8. The voucher covers a portion of Ms. Capri’s rent.
3. In spring 2016, Ms. Capri began looking for a new home for herself and her children in Danbury, CT.
4. Ms. Capri engaged the services of Sarah Becker (“Ms. Becker”), a licensed real estate salesperson to assist her with the search.
5. Ms. Becker found a possible rental for Ms. Capri, a townhouse-style unit known as 57 South Street #3, Danbury, CT (“South Street”).
6. Upon information and belief, Barbara Louise Blauvelt, TR, and Barbara Louise Blauvelt Revocable Trust are the owners of South Street.
7. Upon information and belief, the owners’ address is at 6828 Ardmore Drive, Roanoke, VA 24019.

8. Upon information and belief, the Respondents hired Alfred Surprenant to act as a real estate broker and their agent for the rental of South Street.
9. On or about May 23, 2016, Ms. Becker contacted Mr. Surprenant about South Street.
10. On May 23, 2016, Mr. Surprenant responded to Ms. Becker by telling her that tenants utilizing Section 8 vouchers would not be considered for the South Street unit.
11. Ms. Capri's current rental is significantly inferior to South Street, and conditions have proved so inadequate that she is already forced to look for a different rental unit.
12. Ms. Capri preferred South Street over her current rental for several reasons, including but not limited to the following:
  - a. South Street is significantly newer, having been built in 2006;
  - b. South Street has newer and nicer finishes, including newer stainless steel appliances, newer cabinetry, and granite countertops;
  - c. South Street is a townhouse-style unit, rather than the multifamily-style unit Ms. Capri ultimately rented instead.
13. Respondents are liable for their own discriminatory policies as well as the actions of their agent, Mr. Surprenant.
14. Ms. Capri has suffered severe emotional distress, violation of her rights, and economic damages as a result of Respondents' discriminatory acts.
15. The statements, actions and policies complained of herein constitute discrimination on the bases of lawful source of income in violation of Conn Gen. Stat. § 46a-64c.
16. It is a violation of Connecticut's fair housing statute to refuse to rent a dwelling to any person because of lawful source of income. Conn. Gen. Stat. § 46a-64c(1). Section 8 is a lawful source of income. Conn. Gen. Stat. §46a-63(3) ("lawful source of income' means

income derived from... housing assistance...”); *Comm’n on Human Rights & Opportunities v. Sullivan Associates*, 250 Conn. 763, 775, 739 A.2d 238, 247 (1999) (“the lawful sources of income protected from discrimination by §46a-64c include ‘section 8 rental subsidies as a form of housing assistance.’”).

17. Complainant requests that the CHRO investigate her complaint and secure for her any rights and remedies as guaranteed under the above-cited laws to which she may be entitled, including but not limited compensation for her monetary losses, as well as for her emotional distress.

Barbara Capri being duly sworn, on oath, states that she is the Complainant herein; that she has read the foregoing complaint and knows the content thereof; and that the same is true of her own knowledge.

Dated at Derby, Connecticut this 10 day of Nov, 2016.

B. Capri  
Barbara Capri

Subscribed and sworn by me this 10 day of Nov, 2016.

D. Radice Willis

Notary Public/Commissioner of the Superior Court

My Commission Expires: 07/31/17

**DANA RADICE WILLIS  
NOTARY PUBLIC  
CONNECTICUT**

Submitted by and through counsel:

Pamela Heller  
Connecticut Fair Housing Center  
221 Main Street, 4<sup>th</sup> Floor  
Hartford, Connecticut 06106  
Tel: (860) 247-4400  
Fax: (860) 247-4236  
Email: [pheller@ctfairhousing.org](mailto:pheller@ctfairhousing.org)

**CONNECTICUT COMMISSION ON HUMAN RIGHTS  
AND OPPORTUNITIES**

Barbara Capri	:	Case No.
	:	
Complainant	:	
	:	
v.	:	
	:	
Alfred Surprenant	:	
	:	
Respondent	:	

**COMPLAINT**

1. Barbara Capri (“Ms. Capri”) is a natural person who resides at 10 Robinson Avenue, Danbury, CT 06810.
2. Ms. Capri is a participant in the Housing Choice Voucher program, commonly known as Section 8. The voucher covers a portion of Ms. Capri’s rent.
3. Alfred Surprenant (“Mr. Surprenant”) is a licensed real estate broker with a last known residence at 11 Beach Drive, Danbury, CT 06811.
4. Mr. Surprenant may be doing business as Connecticut Realty Assoc.
5. In spring 2016, Ms. Capri began looking for a new home for herself and her children in Danbury, CT.
6. Ms. Capri engaged the services of Sarah Becker (“Ms. Becker”), a licensed real estate salesperson to assist her with the search.
7. Ms. Becker found another possible rental for Ms. Capri, a townhouse-style unit known as 57 South Street #3, Danbury, CT (“South Street”).
8. Mr. Surprenant held himself out as the broker for the rental of the South Street.

9. Upon information and belief, Barbara Louise Blauvelt Revocable Trust is the owner of South Street.
10. On or about May 23, 2016, Ms. Becker contacted Mr. Surprenant about South Street.
11. On May 23, 2016, Mr. Surprenant responded to Ms. Becker by telling her that tenants utilizing Section 8 vouchers would not be considered for the South Street unit.
12. Mr. Surprenant denied Ms. Capri access to a housing opportunity based on her lawful source of income.
13. Upon information and belief, Mr. Surprenant engages in a pattern and practice of refusing to rent to tenants based on their lawful source of income, specifically Section 8.
14. After she was denied the opportunity to rent South Street because of her lawful source of income, Ms. Capri, with the assistance of Ms. Becker, continued to look for housing for several months, viewing approximately twenty other rental properties and/or units. This cost Ms. Capri time and gas and mileage on her vehicle.
15. In September, 2016, Ms. Capri rented the apartment unit where she currently resides.
16. Ms. Capri's current rental is significantly inferior to South Street, and conditions have proved so inadequate that she is already forced to look for a different rental unit.
17. Ms. Capri preferred the South Street rental over her current rental for several reasons, including but not limited to the following:
  - a. South Street is significantly newer, having been built in 2006;
  - b. South Street has newer and nicer finishes, including newer stainless steel appliances, newer cabinetry, and granite countertops;
  - c. South Street is a townhouse-style unit, rather than the multifamily-style unit Ms. Capri ultimately rented instead.

18. Ms. Capri has suffered severe emotional distress, violation of her rights, and economic damages as a result of Respondent's discriminatory acts.
19. The statements, actions and policies complained of herein constitute discrimination on the basis of lawful source of income in violation of Conn. Gen. Stat. § 46a-64c.
20. It is a violation of Connecticut's fair housing statute to refuse to rent a dwelling to any person because of lawful source of income. Conn. Gen. Stat. § 46a-64c(1). Section 8 is a lawful source of income. Conn. Gen. Stat. §46a-63(3) ("lawful source of income' means income derived from... housing assistance..."); *Comm'n on Human Rights & Opportunities v. Sullivan Associates*, 250 Conn. 763, 775, 739 A.2d 238, 247 (1999) ("the lawful sources of income protected from discrimination by §46a-64c include 'section 8 rental subsidies as a form of housing assistance.'").
21. Complainant requests that the CHRO investigate her complaint and secure for her any rights and remedies as guaranteed under the above-cited laws to which she may be entitled, including but not limited compensation for her monetary losses, as well as for her emotional distress.

Barbara Capri being duly sworn, on oath, states that she is the Complainant herein; that she has read the foregoing complaint and knows the content thereof; and that the same is true of her own knowledge.

Dated at Deerfield, Connecticut this 10 day of Nov, 2016.

B. Capri  
Barbara Capri

Subscribed and sworn by me this 10 day of Nov, 2016.

D. Radice Willis

Notary Public/Commissioner of the Superior Court

My Commission Expires: 7/31/17

**DANA RADICE WILLIS  
NOTARY PUBLIC  
CONNECTICUT**

Submitted by and through counsel:

Pamela Heller  
Connecticut Fair Housing Center  
221 Main Street, 4<sup>th</sup> Floor  
Hartford, Connecticut 06106  
Tel: (860) 247-4400  
Fax: (860) 247-4236  
Email: [pheller@ctfairhousing.org](mailto:pheller@ctfairhousing.org)