



# COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

**CASE NUMBER**

202604-34613616

**COMPLAINANT**

ACLU of Southern California  
Inland Equity Community Land Trust  
Inland Empire Tenants Union

**ADDRESS**

P.O. Box 811370  
Los Angeles, CA 90081

**PHONE**

(213) 977-5278

**TYPE OF DISCRIMINATION AND LAW**

Government Code § 12955

**NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT ENTITY WHO DISCRIMINATED AGAINST ME**

**RESPONDENT(S)**

City of Riverside

**ADDRESS**

Riverside City Clerk's Office  
3900 Main Street, 7<sup>th</sup> Floor  
Riverside, CA 92522

**PHONE**

(951) 826-5567

Riverside City Attorney's Office  
3750 University Avenue  
Suite 250  
Riverside, CA 92501

**PROPERTY TYPE**

Other

**ADDRESS WHERE VIOLATION OCCURRED**

1590 University Avenue  
Riverside, CA 92507

**NO. OF UNITS**

114

**- ALLEGATION-**

**I ALLEGE THAT I EXPERIENCED**

Discrimination (disparate treatment and disparate impact)



## COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT

### CASE NUMBER

202604-34613616

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### DATE OF HARM

Beginning on or around January 13, 2026 and continuing

### BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical, intellectual/developmental, mental health/psychiatric); Source of Income; and Race.

### AS A RESULT, I WAS SUBJECTED TO

Subjected to discriminatory zoning/land use

### PARTICULARS

On January 13, 2026, Respondent City of Riverside (“City”) rejected \$20.1 million Project Homekey+ state funding and the use of \$9.5 million in federal and state funding to convert the Quality Inn Motel located at 1590 University Avenue in Riverside, CA into 114 units of permanent supportive housing for low-income and unhoused residents because of the disabilities of prospective residents.

The public record demonstrates that the City Council’s decision to reject funding for the supportive housing project was based on discriminatory stereotypes about people with disabilities and low-income people with housing subsidies. During and after the January 13<sup>th</sup> vote, council members repeatedly characterized the proposed supportive housing project as inherently criminal, dangerous, and incompatible with the community – not based on objective evidence, but on stigmatizing generalizations about the people who would reside there. Collectively, these statements demonstrate that the vote to reject the project for supportive housing was shaped by discriminatory assumptions equating persons’ disability and source of income—including person’s experiencing homelessness and persons with housing subsidies—with criminality, danger and lawlessness.

City’s decision to reject funding for permanent supportive housing has a negative discriminatory effect because it predictably results in a disparate impact and perpetuates segregated housing patterns on persons based on race, source of income, and disability in violation of Government Code sections 12926, 12955; Cal. Code Reg., tit. 2, section 12005, *et seq.*

ACLU SoCal defends the fundamental rights outlined in the United States Constitution and the Bill of Rights, as well as California constitutional provisions and federal and state laws that further these and similar rights. It operates, maintains an office, and has paid taxes, including sales tax, in the City of Riverside.

**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE  
CALIFORNIA FAIR EMPLOYMENT AND HOUSING ACT****CASE NUMBER**202604-34613616

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Inland Equity Community Land Trust (IECLT) develops and stewards affordable housing and other community assets in Riverside and San Bernardino counties. It operates and has paid sales tax in the City of Riverside. IECLT sponsors the Inland Empire Tenants Union, whose members in the City of Riverside face housing insecurity and/or are unhoused, and who stand to benefit from affordable housing projects such as the one rejected by the City of Riverside. IECLT and its tenant union members are adversely impacted by this funding decision and have a beneficial interest in this matter.

**SIGNED UNDER PENALTY OF PERJURY**

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

**SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL  
REPRESENTATIVE:****DATE:**

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5/8/26

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## COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF GOVERNMENT CODE 11135

**CASE NUMBER**

202604-34827928

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**COMPLAINANT**

ACLU of Southern California  
Inland Equity Community Land  
Trust  
Inland Empire Tenants Union

**ADDRESS**

P.O. Box 811370  
Los Angeles, CA 90081

**PHONE**

213-977-5278

**TYPE OF DISCRIMINATION AND  
LAW**

Government Code section 11135

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT  
ENTITY WHO DISCRIMINATED AGAINST ME

**RESPONDENT(S)**

City of Riverside

**ADDRESS**

Riverside City Clerk's Office  
3900 Main Street, 7<sup>th</sup> Floor  
Riverside, CA 92522

**PHONE**

Riverside City Attorney's Office  
3750 University Avenue  
Suite 250  
Riverside, CA 92501

951-826-5567

**-ALLEGATION-**

**I ALLEGE THAT I EXPERIENCED**

Discrimination



## COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF GOVERNMENT CODE 11135

### CASE NUMBER

202604-34827928

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### DATE OF HARM

Beginning on or around January 13, 2026 and continuing

### BECAUSE OF MY ACTUAL OR PERCEIVED

Disability (physical, intellectual/developmental, mental health/psychiatric)

### AS A RESULT, I WAS SUBJECTED TO

I was denied full or equal access to the benefits of, or subject to discrimination under, a program or activity that was conducted, operated, or administered by the state or a state agency, or a recipient funded or receiving financial assistance from the state or a state agency.

### PARTICULARS

On January 13, 2026, Respondent City of Riverside ("City") rejected \$20.1 million Project Homekey+ state funding and the use of \$9.5 million in federal and state funding to convert the Quality Inn Motel located at 1590 University Avenue in Riverside, CA into 114 units of permanent supportive housing for low-income and unhoused residents because of the disabilities of prospective residents. As a result, the City denied meaningful access to community-based permanent supportive housing to persons with disabilities in the City.

The public record demonstrates that the City Council's decision to reject funding for the supportive housing project was based on discriminatory stereotypes about people with disabilities. During and after the January 13th vote, council members repeatedly characterized the proposed supportive housing project as inherently criminal, dangerous, and incompatible with the community – not based on objective evidence, but on stigmatizing generalizations about the people who would reside there. Collectively, these statements demonstrate that the vote to reject the project for supportive housing was shaped by discriminatory assumptions equating persons' disability with criminality, danger and lawlessness.

ACLU SoCal defends the fundamental rights outlined in the United States Constitution and the Bill of Rights, as well as California constitutional provisions and federal and state laws that further these and similar rights. It operates, maintains an office, and has paid taxes, including sales tax, in the City of Riverside.

Inland Equity Community Land Trust (IECLT) develops and stewards affordable housing and other community assets in Riverside and San Bernardino counties. It operates and has paid sales tax in the City of Riverside. IECLT sponsors the Inland Empire Tenants Union, whose members in the City of Riverside face housing insecurity and/or are unhoused, and who



## COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF GOVERNMENT CODE 11135

**CASE NUMBER**202604-34827928

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stand to benefit from affordable housing projects such as the one rejected by the City of Riverside. IECLT and its tenant union members are adversely impacted by this funding decision and have a beneficial interest in this matter.

**SIGNED UNDER PENALTY OF PERJURY**

By submitting this complaint I am declaring under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own knowledge, except as to matters stated on my information and belief, and as to those matters I believe them to be true.

**SIGNATURE OF COMPLAINANT OR COMPLAINANT'S LEGAL  
REPRESENTATIVE:****DATE:**A handwritten signature in blue ink that reads "Kath Ruff".

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5/8/26

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**COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE  
CALIFORNIA DISABLED PERSONS ACT****CRD NUMBER**202604-34827628

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**COMPLAINANT**ACLU of Southern California  
Inland Equity Community Land  
Trust  
Inland Empire Tenants Union**ADDRESS**P.O. Box 811370  
Los Angeles, CA 90081**PHONE**

213-977-5278

**TYPE OF DISCRIMINATION AND  
LAW**

Civil Code 54, et seq

NAMED IS THE EMPLOYER, PERSON, AGENCY, ORGANIZATION OR GOVERNMENT  
ENTITY WHO DISCRIMINATED AGAINST ME**RESPONDENT(S)**

City of Riverside

**ADDRESS**Riverside City Clerk's Office  
3900 Main Street, 7<sup>th</sup> Floor  
Riverside, CA 92522**PHONE**Riverside City Attorney's Office  
3750 University Avenue  
Suite 250  
Riverside, CA 92501

951-826-5567

**NO. OF  
EMPLOYEES**  
Unknown



## COMPLAINT OF DISCRIMINATION UNDER THE PROVISIONS OF THE CALIFORNIA DISABLED PERSONS ACT

### CRD NUMBER

202604-34827628

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### - ALLEGATION-

#### **DUE TO MY DISABILITY, I ALLEGE THAT I EXPERIENCED**

Discrimination

#### **DATE OF HARM**

Beginning on or around January 13, 2026 and continuing

#### **BECAUSE OF MY ACTUAL OR PERCEIVED**

Disability (physical, intellectual/developmental, mental health/psychiatric)

#### **AS A RESULT, I WAS**

Denied access to services or facilities

### **PARTICULARS**

On January 13, 2026, Respondent City of Riverside ("City") rejected \$20.1 million Project Homekey+ state funding and the use of \$9.5 million in federal and state funding to convert the Quality Inn Motel located at 1590 University Avenue in Riverside, CA into 114 units of permanent supportive housing for low-income and unhoused residents because of the disabilities of prospective residents. As a result, the City denied meaningful access to community-based permanent supportive housing to persons with disabilities in the City.

The public record demonstrates that the City Council's decision to reject funding for the supportive housing project was based on discriminatory stereotypes about people with disabilities. During and after the January 13th vote, council members repeatedly characterized the proposed supportive housing project as inherently criminal, dangerous, and incompatible with the community – not based on objective evidence, but on stigmatizing generalizations about the people who would reside there. Collectively, these statements demonstrate that the vote to reject the project for supportive housing was shaped by discriminatory assumptions equating persons' disability with criminality, danger and lawlessness, and designed to deny the equal access to housing opportunities as are afforded to persons who are not living with disabilities in violation of the California Disabled Persons Act, codified at Civil Code section 54, *et seq.*

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