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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

NERMEN IBRAHIM MOHAMMED IBRAHIM
and SAMAR IBRAHIM MOHAMED IBRAHIM
KHAMIS,

Plaintiffs,

v.

ALTMAN MANAGEMENT COMPANY LLC
and HP ALTMAN AUTUMN RIDGE LLC

Defendants.

Civil Action No.

**COMPLAINT FOR VIOLATIONS OF
42 U.S.C. § 1981 AND NEW JERSEY
LAW AGAINST DISCRIMINATION;
INJUNCTIVE AND DECLARATORY
RELIEF; AND DAMAGES**

(Filed Electronically)

Plaintiffs Nerman Ibrahim Mohammed Ibrahim and Samar Ibrahim Mohamed Ibrahim Khamis (together, “Plaintiffs”) bring the following allegations, based on information and belief, against Defendants Altman Management Company LLC and HP Altman Autumn Ridge LLC (together, “Defendants”):

PARTIES

Plaintiffs

Plaintiff Nerman Ibrahim Mohammed Ibrahim (“Plaintiff Ibrahim”)

1. Plaintiff Ibrahim is a resident of Camden County and resides at [REDACTED]

[REDACTED].

2. Plaintiff Ibrahim has lived in the United States since 2020. She is originally from Egypt. She has applied for asylum. She is 39 years old and currently works as a member service professional for American Express.

3. Plaintiff Ibrahim received her Employment Authorization Document under her asylum application in 2021. Plaintiff Ibrahim is authorized to work in the United States and has a work-only social security number.

4. Plaintiff Ibrahim was subjected to the violations described in this Complaint.

Plaintiff Samar Ibrahim Mohamed Ibrahim Khamis (“Plaintiff Khamis”)

5. Plaintiff Khamis lives in Pennsylvania, and resides at [REDACTED].

6. Plaintiff Khamis has lived in the United States since 2023. She is originally from Egypt and arrived to the United States under a student visa. She is 34 years old.

7. Plaintiff Khamis received her Employment Authorization Document as a student visa recipient in 2025. Plaintiff Khamis is authorized to work in the United States and has a work-only social security number.

8. Plaintiff Khamis was subjected to the violations described in this Complaint.

Defendants

Altman Management Company LLC

9. Defendant Altman Management Company LLC (“Altman Management”) operates and manages Autumn Ridge Apartments.

10. On its website, Altman Management describes itself as a construction company that operates “approximately 80 apartment communities, serving thousands of residents” in

Pennsylvania, New Jersey, and Delaware. See <https://altmangroupco.com/altman-management> (last visited, June 10, 2026).

11. Altman Management is headquartered at 240 New York Drive, Suite 1, Fort Washington, Pennsylvania 19034.

HP Altman Autumn Ridge LLC

12. Defendant HP Altman Autumn Ridge LLC owns Autumn Ridge Apartments.

13. Autumn Ridge Apartments is an apartment complex located at 1501 Little Gloucester Road, Blackwood, New Jersey in Camden County.

14. HP Altman Autumn Ridge LLC is headquartered at 240 New York Drive, Suite 1, Fort Washington, Pennsylvania 19034.

INTRODUCTION

15. Defendants follow a policy of denying housing to applicants on the basis of their alienage, religion, ethnicity and/or nationality, including asylum applicants.

16. Plaintiffs were and are unable to access Defendants' rental housing units without unequal conditions imposed upon them on the basis of their alienage, religion, ethnicity, and/or nationality. Plaintiffs bring this case against Defendants for unlawful discrimination on the basis of alienage in violation of the Civil Rights Act of 1866, as codified at 42 U.S.C. § 1981 ("Section 1981"), and unlawful discrimination on the basis of religion, ethnicity, and/or nationality in violation of the New Jersey Law Against Discrimination, as codified at N.J.S.A. 10:5-1, *et seq.* ("NJLAD").

17. Defendants' violations have inflicted harm on Plaintiffs including, but not limited to, access to rental housing units with unfavorable terms and conditions, and emotional distress.

JURISDICTION AND VENUE

18. This Court has subject matter jurisdiction over Plaintiffs’ Section 1981 claims under 28 U.S.C. § 1331. This Court has supplemental jurisdiction over Plaintiffs’ state-law claims under 28 U.S.C. § 1367.

19. This Court may issue a declaratory judgment under 28 U.S.C. §§ 2201 and 2022.

20. Venue is proper in this district under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in this District.

FACTUAL ALLEGATIONS

21. Ibrahim has continuously possessed an employment authorization card and a work-only social security number.

22. Plaintiff Ibrahim’s employment authorization card and work-only social security number were valid when she submitted her lease application.

23. Plaintiff Khamis arrived to the United States in 2023 as a student visa recipient.

24. On June 11, 2024, Plaintiffs and their mother met with Community Manager Nicole Calorio-Och to apply for a rental unit at Autumn Ridge Apartments.

25. During the visit, Plaintiffs’ mother wore a hijab and an abaya—traditional clothing worn by Muslim women.

26. Calorio-Och asked the women to produce identification and earnings statements. Plaintiff Khamis submitted her passport and student visa. Plaintiff Ibrahim told Calorio-Och that she did not have the required documents with her; Calorio-Och told her to email her the documents within 48 hours.

27. When reviewing the passport, Calorio-Och asked them whether they were from Dubai. Plaintiffs answered that they were originally from Egypt but had lived in Dubai before

immigrating to the United States. Calorio-Och then asked whether their mother would be living with them; Plaintiffs said that their mother will not be living with them. After the discussion, Calorio-Och gave a tour of an unclean and generally undesirable rental unit.

28. Plaintiff Ibrahim originally intended to serve as a co-signer for her sister, Plaintiff Khamis. Calorio-Och informed Plaintiff Ibrahim that the co-signer's income had to be four times the monthly rent. Because Plaintiff Ibrahim's income was insufficient, she decided that she would be the primary applicant. The income requirement for the primary applicant only had to be three times the rent, and Plaintiff Ibrahim's income was sufficient to meet it. However, when Plaintiff Ibrahim informed Calorio-Och of this change, Calorio-Och became angry and accused Plaintiffs of lying to her.

29. On June 12, 2024, Plaintiff Ibrahim emailed the requested documents, including her earning statements and work-only social security card, to Calorio-Och. That same day, Calorio-Och informed Plaintiff Ibrahim that she needed her permanent resident card, to which Plaintiff Ibrahim responded that she does not have a permanent resident card and instead has an Employment Authorization Document. Calorio-Och then denied Plaintiff Ibrahim's application because Autumn Ridge Apartments accepts only a visa or permanent resident card, stating: "[W]e need a Visa or PRC that is all we can accept [...] I will have to shred your application."

30. After the denial, Plaintiffs had to find a new residence quickly. Their mother no longer went with Plaintiffs to visit apartments because she felt that by wearing traditional Muslim clothing, she was the reason for Plaintiffs' denial.

31. Plaintiffs were accepted into another rental community and successfully resided there for one year. Following changes in personal circumstances, Plaintiff Ibrahim returned to reside with her husband at his residence, where she currently lives. Plaintiff Khamis chose not to

renew her lease at that residence because it did not offer the same facilities, amenities, or level of security as Autumn Ridge Apartments. She subsequently secured and moved into a separate rental housing.

32. On October 15, 2024, Plaintiffs submitted a verified complaint with the New Jersey Division of Civil Rights, alleging that Altman Management Company LLC, HP Altman Autumn Ridge LLC, and Calorio-Och engaged in unlawful housing discrimination, in violation of the New Jersey Law Against Discrimination on the basis of religion, national origin, ethnicity, and/or nationality.

33. Plaintiffs suffered harm as a result of Defendants' denial of their rental application on the basis of their alienage, religion, ethnicity and/or nationality. Defendants' denial of their application caused Plaintiffs to suffer harm, including actual damages, emotional distress, and other negative effects of finding a new residence with less-than desirable facilities.

34. Until these incidents, Plaintiffs had never previously been denied the opportunity to rent an apartment unit on the basis of their protected characteristics. Defendants' denial of their rental application caused Plaintiffs to feel the deleterious effects of discrimination.

35. Defendants' refusal to offer Plaintiffs an opportunity to rent because of their limited and arbitrary housing requirements violates 42 U.S.C. § 1981, and the New Jersey Law Against Discrimination.

36. There is an actual and substantial controversy between Plaintiffs and Defendants.

FIRST CAUSE OF ACTION

**Alienage Discrimination
(42 U.S.C. § 1981)**

37. Plaintiffs incorporate by reference all the allegations raised in this Complaint.

38. Plaintiffs are persons within the jurisdiction of the United States at the time of Defendants' discriminatory acts.

39. Plaintiffs are not U.S. citizens.

40. Plaintiffs have the right to make and enforce contracts in the United States and are entitled to the full and equal benefits of the law.

41. Defendants conduct business in the United States and are obligated to comply with the provisions of 42 U.S.C. § 1981.

42. Defendants intentionally discriminated against Plaintiffs on the basis of alienage by denying them housing and/or the opportunity for housing.

43. Plaintiffs have no plain, adequate, or complete remedy at law to redress the wrongs alleged here.

44. Plaintiffs request that the Court issue a permanent injunction ordering Defendants to alter their housing policies and practices to prevent future discrimination on the basis of alienage and to prevent future violations of 42 U.S.C. § 1981.

45. Plaintiffs are now suffering, and will continue to suffer, irreparable injury from Defendants' discriminatory acts and omissions.

46. Plaintiffs have suffered significant damages due to Defendants' discriminatory acts and omissions.

SECOND CAUSE OF ACTION

Violation of the New Jersey Law Against Discrimination (New Jersey Statutes Annotated 10:5-1, *et seq.*)

47. Plaintiffs incorporate by reference all the allegations raised in this Complaint.

48. Plaintiffs are persons within the jurisdiction of New Jersey and resided in New Jersey at the time of Defendants' discriminatory acts.

49. Defendants own, operate, and/or manage housing units within the jurisdiction of New Jersey, and are obligated to comply with the provisions of the New Jersey Law Against Discrimination, New Jersey Statutes Annotated 10:5-1, *et seq.*

50. Plaintiffs are entitled to full and equal access to housing of every kind without discrimination no matter their religion, ethnicity, and/or nationality, and no landlord may refuse to rent a housing unit to Plaintiffs on the basis of their religion, ethnicity, and/or nationality.

51. Defendants violated the New Jersey Law Against Discrimination by denying Plaintiffs the opportunity to apply, or denying Plaintiffs full and equal consideration, for housing free of discriminatory conditions imposed because of their religion, ethnicity, and/or nationality.

52. Plaintiffs have no plain, adequate, or complete remedy at law to redress the wrongs alleged here. Plaintiffs demand damages, and request that the Court issue a permanent injunction ordering Defendants to alter their housing policies and practices to prevent future discrimination on the basis of an applicant's religion, ethnicity, and/or nationality and to prevent violations of the New Jersey Law Against Discrimination.

53. Plaintiffs are now suffering and will continue to suffer irreparable injury from Defendants' discriminatory acts and omissions.

54. Plaintiffs have suffered significant damages due to Defendants' discriminatory acts and omissions.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs Ibrahim and Khamis respectfully request the following relief:

- i. Declaratory judgment that Defendants' policies and practices complained of here are unlawful and violate 42 U.S.C. § 1981 and New Jersey Law Against Discrimination;

- ii. Preliminary and permanent injunction against Defendants and their officers, agents, successors, employees, representatives, and any and all persons acting in concert with them, from engaging in each of the unlawful policies and practices set forth here and described in the preceding paragraphs;
- iii. Award of compensatory damages to Plaintiffs in an amount to be determined;
- iv. Award of costs incurred, including reasonable attorneys' fees and costs to the extent allowable by law;
- v. Pre-judgment and post-interest judgment, as provided by law; and
- vi. For such other and further relief as this Court deems just and proper.

Dated: June 11, 2026

Respectfully submitted,

s/ Alexander L. Callo

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Attorneys for Plaintiffs

CERTIFICATION UNDER LOCAL CIVIL RULES 11.2 & 40.1

Under Local Civil Rules 11.2 and 40.1, I hereby certify that the matter in controversy is related to *De Guzman v. Altman Management Company LLC, et al.*, Civil Action No. 24-7280 (KMW)(EAP) (D.N.J.) because the matter in controversy involves the same defendants and subject matter (i.e., allegations of illegal discrimination in housing based on alienage). I further certify that the matter in controversy is not the subject of any other action pending in any court or of any pending arbitration or administrative proceeding.

Dated: June 11, 2026

Respectfully submitted,

s/ Alexander L. Callo

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CIVIL COVER SHEET

JS 44 (Rev. 04/21)

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Nerman Ibrahim Mohammed Ibrahim and Samar Ibrahim Mohamed Ibrahim Khamis

(b) County of Residence of First Listed Plaintiff Camden County, NJ
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Alexander L. Callo, SAUL EWING LLP, One Riverfront Plaza,
1037 Raymond Blvd., Newark, NJ 07102-5426, 973-286-6720

DEFENDANTS

Altman Management Company LLC and HP Altman Autumn Ridge LLC

County of Residence of First Listed Defendant Montgomery County, PA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	IMMIGRATION
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities-Employment <input type="checkbox"/> 446 Amer. w/Disabilities-Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation-Transfer
- 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. § 1981

Brief description of cause:
This is an action for unlawful discrimination on the basis of alienage in violation of the Civil Rights Act of 1866

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ _____

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE Judges Williams and Pascal DOCKET NUMBER 24-7280

DATE 6/11/2026

SIGNATURE OF ATTORNEY OF RECORD s/ Alexander L. Callo

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____