

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SHARONDA STEWART,)	
)	
Plaintiff,)	
)	CASE NO:
V.)	
)	<u>JURY TRIAL DEMANDED</u>
AIRBNB, INC.;)	
GEORGE YU SHIHFANG;)	
JOHN DOE 1; and)	
JOHN DOE 2,)	
)	
Defendants.)	

COMPLAINT FOR DAMAGES

COMES NOW, Sharonda Stewart, by and through undersigned counsel, in the above-styled action, and brings this Complaint for Damages and respectfully shows the Court the following:

This is a civil rights action arising from unlawful racial discrimination in housing and/or public accommodations. Defendants denied Plaintiff the ability to rent lodging accommodations offered through Airbnb because of Plaintiff's race and/or perceived race, in violation of federal and Georgia law. Defendants intentionally discriminated against Plaintiff by refusing to approve Plaintiff's rental request, canceling accommodations after learning Plaintiff's race, applying disparate standards, and/or otherwise interfering with Plaintiff's contractual and statutory rights.

As a direct and proximate result of Defendants' conduct, Plaintiff suffered humiliation, emotional distress, inconvenience, economic loss, and deprivation of federally protected rights. An actual controversy exists between the parties, in that the challenged actions, of these Defendants, has caused and will continue to cause, the Plaintiff substantial harm, unless the requested relief is granted.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because this action arises under the laws of the United States.

2. This Court has jurisdiction pursuant to 28 U.S.C. § 1343 because this action seeks redress for deprivation of civil rights.

3. Plaintiff asserts claims under, inter alia:

a. The Fair Housing Act, 42 U.S.C. § 3601 et seq.;

b. 42 U.S.C. § 1981;

c. 42 U.S.C. § 1982; and

d. Applicable Georgia state law.

4. Venue is proper in the Northern District of Georgia pursuant to 28 U.S.C. § 1391 because a substantial part of the events giving rise to these claims occurred in this District and the subject property is located within this District.

PARTIES

5. Plaintiff is a natural person residing in Fulton County, Georgia.
6. **Defendant AirBnb, Inc.**, is a Delaware corporation authorized to conduct business in Georgia and regularly conducts substantial business within this District.
7. **Defendant George Yu Shihfang**, is a natural person residing in Fulton County, Georgia and owned, operated, leased, managed, and/or controlled the subject rental property located at 1729 Manhasset Drive, Atlanta, Georgia 30338.
8. **Defendant John Doe 1**, is natural person who regularly leases properties on the Airbnb platform and goes by the pseudonym “JustDo” on the Airbnb platform.
9. **Defendant John Doe 2**, is natural person who regularly leases properties on the Airbnb platform and goes by the pseudonym “Konstantin” on the Airbnb platform.

FACTS

10. On or about June 2, 2024, Plaintiff, an African American woman, sought to rent long-term lodging accommodations through Airbnb.
11. Plaintiff submitted a reservation request for the property located at 1729 Manhasset Drive, Atlanta, Georgia 30338.
12. Prior to disclosure of Plaintiff’s race and/or racial identity, communications with Defendants were cordial and indicated likely approval.
13. Upon learning Plaintiff’s race through specific racially based questions,

Defendants changed their conduct toward Plaintiff.

14. Defendants denied, canceled, ignored, obstructed, or otherwise interfered with Plaintiff's reservation request.

15. Defendants refused to respond further to Plaintiff's reservation request or inquiries, which resulted in a rejection of Plaintiff's reservation request on the Airbnb app.

16. Upon information and belief, similarly situated white applicants were treated more favorably.

17. A further inspection of the published rental listing shows Defendants advertised under Neighborhood Highlights a "Peaceful white neighborhood". (*See Exhibit A*).

18. Shortly after the incident, Plaintiff filed a complaint with Defendant Airbnb, showing the racially preferential language used in the advertisement.

19. Defendant Airbnb closed Plaintiff's complaint, refused to take action, and allowed the discriminatory advertisement to remain.

20. Defendants maintained policies, practices, customs, or discretionary systems permitting race discrimination against African-American customers and/or other racial minorities.

21. Defendant Airbnb knew or should have known that discriminatory practices were occurring on its platform.

22. Despite notice, complaints, prior incidents, public reporting, internal data, and/or Plaintiff's complaint, Airbnb failed to adequately prevent, investigate, monitor, or remedy discriminatory conduct.

23. Airbnb materially participated in the transaction by controlling listings, communications, payment processing, platform access, ratings, booking approvals, dispute procedures, and enforcement mechanisms.

24. Defendants' conduct was intentional, malicious, reckless, willful, wanton, and in conscious disregard of Plaintiff's federally protected rights.

25. As a direct and proximate result of Defendants' actions, Plaintiff suffered:

- a. Emotional distress;
- b. Embarrassment and humiliation;
- c. Economic damages;
- d. Loss of housing opportunity;
- e. Inconvenience;
- f. Attorneys' fees and costs; and
- g. Other damages to be proven at trial.

COUNT I
VIOLATIONS OF THE FAIR HOUSING ACT
42 USC § 3604 et seq.

26. Defendants discriminated against Plaintiff in the terms, conditions, privileges, rental, and/or availability of housing because of race.

27. Defendants made dwellings unavailable to Plaintiff because of race.

28. Defendants represented that housing was unavailable when such housing was in fact available.

29. Defendants' conduct violated 42 U.S.C. § 3604(a), (b), (c), (d), and related provisions, including but not limited to refusing to rent to Plaintiff based on race, discriminating against Plaintiff based on race, and publishing an advertisement indicating a racial preference.

30. Plaintiff has suffered damages as a direct result of Defendants' unlawful conduct.

COUNT II
VIOLATIONS OF 42 USC § 1981

31. Plaintiff is a member of a protected racial class.

32. Defendants intended to discriminate against Plaintiff on the basis of race.

33. The discriminatory conduct impaired Plaintiff's right to make and enforce contracts on equal terms with white citizens.

34. Defendants violated 42 U.S.C. § 1981.

35. Plaintiff has suffered damages as a direct result of Defendants' unlawful conduct.

COUNT III
VIOLATIONS OF 42 USC § 1982

36. Defendants deprived Plaintiff of rights relating to the lease, rental, holding,

and conveyance of property because of race.

37. Defendants violated 42 U.S.C. § 1982.

38. Plaintiff has suffered damages as a direct result of Defendants' unlawful conduct.

COUNT IV
NEGLIGENCE/NEGLIGENT SUPERVISION

39. Defendants owed duties to users of the Airbnb platform, including Plaintiff, to exercise reasonable care in preventing unlawful discrimination.

40. Defendants breached those duties through inadequate supervision, training, monitoring, investigation, enforcement, and anti-discrimination safeguards.

41. Defendants represented that housing was unavailable when such housing was in fact available.

42. Plaintiff has suffered damages as a direct result of Defendants' unlawful conduct.

COUNT V
VIOLATIONS OF GEORGIA'S FAIR HOUSING ACT
O.C.G.A. § 8-3-202

43. Defendants discriminated against Plaintiff in the terms, conditions, privileges, rental, and/or availability of housing because of race.

44. Defendants made dwellings unavailable to Plaintiff because of race.

45. Defendants represented that housing was unavailable when such housing was in fact available.

46. Defendants' conduct violated O.C.G.A. § 8-3-202 (a), (b), (c), (d), and related provisions, including but not limited to refusing to rent to Plaintiff based on race, discriminating against Plaintiff based on race, and publishing an advertisement indicating a racial preference.

47. Plaintiff has suffered damages as a direct result of Defendants' unlawful conduct.

COUNT VI
PUNITIVE DAMAGES

48. Defendants acted with malice, fraud, oppression, wantonness, or conscious indifference to consequences.

49. Plaintiff is entitled to punitive damages under applicable federal and state law.

WHEREFORE, Plaintiff prays for a judgment to be awarded to him and against the Defendants and for the following:

- a) Process issue and Defendants be served as provided by law;
- b) Plaintiff has a trial by a jury of twelve (12);
- c) Plaintiff be awarded actual damages in the amounts to be shown at trial from Defendants;
- d) Plaintiff be awarded all general, special, compensatory, incidental, consequential, and all other permissible damages in accordance with the enlightened conscience of an impartial jury;

- e) Plaintiff be awarded punitive damages upon a reasonable showing of evidence in accordance with the enlightened conscience of an impartial jury;
- f) Plaintiff be awarded attorneys' fees and costs of litigation; and
- g) Plaintiff be awarded such other relief as the court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by a jury of twelve (12) on any and all issues properly triable by jury in this action.

This 28th day of May, 2026.

Respectfully submitted,

FULL COURT LAW, LLC

/s/ Bataski D. Bailey

Plaintiff, *Pro Se*

Georgia Bar No. 403097

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EXHIBIT A



Anyw... Any ... Add g...

Airbnb your home



Remote Work @ Japanese Minka Mansion Incubator

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Show all photos

Room in Dunwoody, Georgia

1 bed · Dedicated bathroom

★ [2 reviews](#)



Stay with JustDo

Superhost · 5 years hosting

Add dates for prices

CHECK-IN Add date	CHECKOUT Add date
GUESTS 1 guest ▼	

[Check availability](#)



Room in a villa

Your own room in a home, plus access to shared spaces.



Dedicated workspace

A common area with wifi that's well-suited for working.



JustDo is a Superhost

Superhosts are experienced, highly rated Hosts.







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About this place

Private 2.5 acre Estate nestled in the heart of Dunwoody Georgia. Complete with a tennis court, pool and jacuzzi. Home to 1 out of 30 Giant Meta Sequoia in the south east. Native to the Pacific West Coast the 250+ year old tree is what this unique Mansard Roof Home was built around in 1965.

[Show more >](#)

What this place offers


-  Lock on bedroom door
-  Kitchen
-  Wifi
-  Dedicated workspace
-  Free parking on premises
-  Shared pool
-  Shared hot tub
-  TV
-  Washer
-  Exterior security cameras on property

[Show all 30 amenities](#)

Select check-in date

Add your travel dates for exact pricing

January 2025							February 2025						
Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa
													1
							2	3	4	5	6	7	8
							9	10	11	12	13	14	15
19	20	21	22	23	24	25	16	17	18	19	20	21	22
26	27	28	29	30	31		23	24	25	26	27	28	

 [Clear dates](#)

2 reviews

Average rating will appear after 3 reviews

Jaren

Duluth, Georgia

★★★★★ · April 2024 · Stayed one night

Awesome Place and a nice room with a good view! Close to everything too!

James

Austin, Texas

★★★★★ · April 2024 · Stayed one night

Amazing stay for my family and I for our short duration in Atlanta. Beautiful home and friendly neighborhood! Will definitely visit again!

Where you'll be

Dunwoody, Georgia, United States

Neighborhood highlights

Peaceful white neighborhood. The estate is on 2 1/2 acres in a private oasis. No neighbors around.

[Show more](#) >

Meet your host



JustDo
Superhost

12

Reviews

4.67★

Rating

5

Years hosting

JustDo is a Superhost

Superhosts are experienced, highly rated hosts who are committed to providing great stays for guests.

Co-hosts

Konstantin

Host details

Response rate: 100%

Responds within a day

[Message host](#)

Born in the 90s

Where I went to school: University Of Georgia

My work: Real Estate Development

Speaks Chinese, English, and Spanish

I'm happy to spend time with my guests or give them space

To help protect your payment, always use Airbnb to send money and communicate with hosts.

I am a Real Estate developer from Atlanta GA and now living in Mexico! I travel a lot and have visited 35

[Show more >](#)

Things to know

House rules

- Check-in after 3:00 PM
- Checkout before 10:00 AM
- 2 guests maximum

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Safety & property

- Exterior security cameras on property
- Pool/hot tub without a gate or lock
- Carbon monoxide alarm

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Cancellation policy

Add your trip dates to get the cancellation details for this stay.

[Add dates >](#)

[Airbnb](#) > [United States](#) > [Georgia](#) > [DeKalb County](#) > [Dunwoody](#)

Explore other options in and around Dunwoody

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Vacation rentals

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 English (US)

\$ USD

