



*Yisroel Schulman, Esq.
President & Attorney-In-Charge*

**Testimony by New York Legal Assistance Group (NYLAG)
before the NYC Council Subcommittee on Public Housing:
Oversight Hearing on NYCHA's Annual Plan Process and Criteria for
Amendments**

December 7, 2009

Chair Rosie Mendez, Councilmembers, staff, good afternoon and thank you for the opportunity to speak about NYCHA's Annual Plan process and criteria for amendments. My name is Kamilla Sjödin and I am the Supervising Attorney of the Housing Project at the New York Legal Assistance Group, a nonprofit law office dedicated to providing free legal services in civil law matters to low-income New Yorkers. NYLAG serves immigrants, seniors, the homebound, families facing foreclosure, renters facing eviction, low-income consumers, those in need of government assistance, children in need of special education, domestic violence victims, persons with disabilities, patients with chronic illness or disease, low-wage workers, low-income members of the LGBT community, Holocaust survivors, as well as others in need of free legal services. For full disclosure, I am a former employee of the New York City Council where I, at one time, served as counsel to the Subcommittee on Public Housing. I am joined today by my colleague, Stacey Harkey.

The Code of Federal Regulations (“Regulations” or “CFR”) requires NYCHA to consider the suggestions and concerns of public housing residents and the general public as it develops its Annual Plan. *See* 24 C.F.R. §§ 903.13, 903.17. Specifically, the Regulations require NYCHA to make its proposed Annual Plan available to the public and to hold a public hearing where people can discuss and comment on the proposed Annual Plan. *See* 24 C.F.R. § 903.17. Pursuant to the CFR, NYCHA must also allow the public to attend any meeting held to make “a significant amendment or modification” to an Annual Plan that has been finalized. *See* 24 C.F.R. § 903.21. NYCHA is further obligated to consult with the Resident Advisory Board (“Board” or “RAB”) and consider the Board’s recommendations whenever it prepares an Annual Plan or makes a “significant amendment or modification” to a final Annual Plan. *See* 24 C.F.R. §903.13(c).

However, the meaning of “significant amendment or modification” is not clear. *See* 24 C.F.R. §§ 903.7(r)(2), 903.21(a); NYCHA Final Annual Plan for Fiscal Year 2010, 123. The Regulations give NYCHA the authority to define the term by requiring NYCHA to at least “identify the basic criteria [it] will use for determining” what constitutes a “significant amendment or modification” in its Annual Plan. *See* 24 C.F.R. § 903.7(r)(2). In its Final Annual Plan for Fiscal Year 2010, the most recent Annual Plan, NYCHA fails to define the term. *See* NYCHA Final Annual Plan for Fiscal Year 2010, 123. The Annual Plan provides guidance on the conditions that will prompt NYCHA to amend it, but does not actually define the term “significant amendment or modification” or otherwise distinguish between significant and insignificant changes to the Annual Plan. *See* NYCHA Final Annual Plan for Fiscal Year 2010, 123. The Annual

Plan merely states that NYCHA will make amendments or modifications whenever there is a substantial change in federal law that affects the Annual Plan or whenever there is “[a]ny other event that the Authority determines to be a significant amendment or modification of an approved annual plan.” *See* NYCHA Final Annual Plan for Fiscal Year 2010, 123.

This standard is unacceptably vague. By failing to outline the criteria it will use to determine whether an amendment or modification is significant, NYCHA has made it impossible for the public and the Board to determine whether amendments and modifications should require their involvement.

Accordingly, the Council should urge NYCHA to define what a “significant amendment or modification” to the Annual Plan would be in order to provide the public a meaningful opportunity to comment on any proposed significant changes to the Plan.

NYCHA’s failure to define the phrase “significant amendment or modification” in its Annual Plan is indicative of larger concerns with transparency at NYCHA. To mention but one example, the NYCHA Management Manual (“NYCHA Manual” or “Manual”) contains the administrative rules relating to tenancies, evictions, and other related procedures. However, not only does NYCHA not provide the opportunity to give meaningful comment on the contents of the Manual when the rules are being changed, but it is near impossible to obtain a complete copy of the Manual from NYCHA. Neither advocates nor tenants have adequate access to the rules that govern tenant’s lives, rights and responsibilities, and, perhaps more importantly, evictions in administrative proceedings. This results in many tenants being evicted without the opportunity to know or review the rules by which they are being evicted.

The Due Process clauses of both the United and New York States Constitutions as well as the New York State Administrative Procedure Act require NYCHA to be forthcoming with NYCHA residents and the general public. NYCHA makes decisions on a daily basis that affect NYCHA residents' constitutionally protected property interests in their apartments. *See U.S. v. Leasehold Interest*, 760 F.Supp. 1015, 1027 (E.D.N.Y. 1991). As such, NYCHA is required to provide residents with proper notice whenever their property interests may be adversely affected. *See Escalera v. New York City Housing Authority*, 425 F.2d 853, 864 (2nd Cir. 1970).

NYCHA should attempt to fulfill its constitutional obligations in the most thorough manner possible. For example, when it seeks to amend or modify its Annual Plan in a way that may adversely affect its residents' constitutionally protected rights in their apartments, NYCHA should take extra care to ensure that it properly notifies its residents and includes them in the decision-making process, as federal law requires. Additionally, Annual Plan amendments or modifications that affect NYCHA resident's constitutional rights are certainly "significant," and NYCHA's definition of "significant amendment or modification" should reflect that.

The New York State Administrative Procedure Act ("Act") also imposes requirements on NYCHA with regard to its rule making process. *See NY State Admin. Proc. Act* § 100, *et seq.* As a state agency, NYCHA is required to follow the rule making procedures delineated in the Act. *See NY State Admin. Proc. Act* §§ 102 & 202. At a minimum, the Act requires that NYCHA submit a Notice of Proposed Rule Making to the New York Secretary of State for publication in the State Register and give the public an opportunity to comment before it adopts any new rules. *See NY State Admin. Proc. Act*

§ 202. NYCHA does not currently comply with this process as it does not make its rules adequately available to the public either before or after they are formally adopted.

NYCHA's failure to comply with the Act does a great disservice to NYCHA residents and the public. NYCHA residents and the public have the affirmatively expressed right to be involved in the rule-making process and the right to be informed about rules that may affect their lives.

We conclude by urging NYCHA to define the requisite language in the Annual Plan and to provide the public meaningful opportunity to comment on significant changes to the Annual Plan as well as other rules, procedures, and plans in accordance with the Code of Federal Regulations, Federal and State Constitutions, and Administrative Procedure Act.

We would welcome the opportunity to further discuss or comment on these matters in the future.

Thank you for the opportunity to testify today.

Respectfully submitted,

Kamilla Sjödin, Supervising Attorney

Stacey Harkey, Law Graduate

**TESTIMONY BY ANNE-MARIE FLATLEY,
DIRECTOR, RESEARCH AND MANAGEMENT ANALYSIS DEPARTMENT
CITY COUNCIL HEARING
Sub-Committee on Public Housing
December 7, 2009 1 PM**

Good Afternoon Chairwoman Mendez and members of the committee. I am Margarita López, Commissioner of the New York City Housing Authority. I am here, along with two leading experts at NYCHA, Anne Marie Flatley, Director of Research and Management Analysis, and Steven Love, Director of Federal Relations, Policy and Compliance, to provide information about the Annual Plan and federal regulations.

It is a new day at NYCHA, with leadership under Chairman John Rhea that is committed to being more transparent and involving our residents moving forward. To emphasize that, I am announcing today that, from now on, NYCHA will post all supporting documents to our Annual Plan and related materials on our Website. We believe that this will be a concrete step towards educating residents and the public around our issues.

This new policy is also consistent with NYCHA's green agenda as it saves paper, energy and funding.

I will be here to assist with any questions you might have after our testimony and for the duration of today's hearing. Now, I will let my colleagues make their presentation. Thank you.

Chair Mendez, and members of the City Council good afternoon. I am Anne-Marie Flatley, NYCHA's Director of Research and Management Analysis. Joining me today is Steven Love, Senior Counsel for Federal Relations, Policy and Compliance. We are here to provide information to the Council on NYCHA's annual plan process.

What is the PHA Plan?

The quality housing and work responsibility act (QHWRA) of 1998 created the public housing agency plan requirement.

The agency plan is a comprehensive guide to public housing agency's PHA) policies, programs, operations and it's strategies for meeting local housing needs.

There are two parts to the agency plan: the five-year plan, which every public housing agency submits once every fifth fiscal year, describing the agency's mission, its long range goals and objectives and the annual plan, which is submitted to HUD every year.

The plan also serves as the annual application for capital grants supporting upgrades and other renovations to public housing through the capital fund program.

Required elements of the annual plan

HUD regulations require that each plan contain the following elements:

- 1) Statement of eligibility, selection, admissions and deconcentration policies,
- 2) A statement of financial resources - a listing of the PHA's anticipated resources, including operating, capital and other anticipated federal resources available to the PHA
- 3) PHA rent policies - a statement describing the agency's policies governing public housing rents, flat rents and the rent contributions of families receiving section 8. This also includes minimum rents and the agency's payment standard.
- 4) The rules, standards, and policies that govern maintenance and management of housing owned, assisted or operated by the PHA.
- 5) The agency's grievance procedures - we are referring to the grievance and informal hearing and review procedures available to residents and applicants.
- 6) A list of developments designated as housing for elderly families or families with disabilities.
- 7) A description of the PHA's community service and self-sufficiency programs. The statement describes: (1) programs relating to services and amenities offered to assisted families; (2) policies for the enhancement of economic self-sufficiency of assisted families, including section 3; and (3) how we meet the requirements of community service.
- 8) The agency's plan for safety and crime prevention, established in consultation with the police department.
- 9) Our policies regarding pet ownership in public housing.
- 10) A certification that the agency carries out its plan in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d-§2000d-4), the 1968 Fair Housing Act (42 U.S.C. §3601-§3619), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794), and Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §12101 et seq.). The PHA also must certify that it will affirmatively further fair housing.
- 11) The results of the most recent fiscal year audit of the PHA.
- 12) A statement describing how the agency will carry out its asset management requirements.
- 13) Policies, services, or programs offered by an agency, to children or adult victims of domestic violence, dating violence, sexual assault, or stalking;
- 14) Data relating to Hope VI or mixed finance modernization or developments
- 15) A statement regarding the proposed demolition and/or disposition of public housing.
- 16) Information on the conversion of public housing to tenant-based assistance.
- 17) Homeownership activities by the agency.
- 18) A statement on the projected number of project-based units.

- 19) A statement describing the capital improvements necessary to ensure long-term physical and social viability of the PHA's public housing developments.
- 20) A statement of the housing needs of families residing in the jurisdiction and how the agency, to the maximum extent practicable, hopes to address those needs.
- 21) A brief statement of the agency's progress in meeting the mission and goals described in the 5-year plan;
- 22) Must contain the agency's definition of what constitutes a substantial deviation from its 5-year plan or a significant amendment or modification to its 5-year plan and annual plan;
- 23) Recommendations of the Resident Advisory Board (RAB) and description of the manner in which the agency addressed those recommendations;
- 24) A description of the agency's board.
- 25) City Planning's statement of consistency with the consolidated plan;
- 26) The agency's admissions policy for deconcentration, and
- 27) A list of all resident advisory board members.

The PHA plan development process & timeline

The annual PHA plan is due at HUD 75 days prior to the start of the agency's fiscal year.

The PHA's schedule for plan development builds in sufficient time for the following: submission of the final plan by the due date; the 45-day public review period; the public hearing and addressing of comments received on the plan; obtaining the required certifications and the NYCHA board's certification.

It is important to point out that HUD, relying on the statutory authority of the recovery act, has waived the 45-day notice period in regard to the use of stimulus funding. The 45-day period is reduced to 10 calendar days for agency's seeking to amend their five-year or annual plans. That action can be found in notice PIH 2009-12(HA), issued on March 18, 2009.

The role of the resident advisory board (RAB)

Federal law requires that a PHA establish a resident advisory board (RAB) as part of the PHA plan process. The role of the resident advisory board is to participate in the development of the plan or of any significant amendment to the PHA plan.

The RAB must include reasonable representation of public housing families in addition to families receiving Section 8 assistance. NYCHA's RAB consists of 74 delegates and alternates, includes the nine city-wide members of the Council of Presidents and five (5) Section 8 representatives.

The agency must consider the recommendations of the RAB in preparing the draft and final plans and must include in the submitted plan a description of the manner in which the PHA addressed their concerns.

Process for obtaining public comment on the annual plan

The PHA's board must conduct a public hearing to obtain public comments on the draft plan. The hearing must be conducted at a location that is convenient to the residents and take place 45-days after the proposed plan, the required attachments and documents related to the plan, are made available for public inspection at the principal office of the agency during regular business hours.

The agency is required to publish a notice informing the public that the draft plan is available for review and inspection, and when and where a public hearing on the plan will take place.

The agency must conduct reasonable outreach to encourage broad public participation in the PHA plans.

The final plan must be submitted to HUD 75 days before the start of the agency's fiscal year. Since NYCHA's fiscal year is also the calendar year, it must submit the plan by October 17th.

Once submitted, HUD has 75 days to review the plan. If HUD fails to issue a notice of disapproval on or before the 75th day, the law provides that the plan is deemed to be approved.

Process for amending or modifying the annual plan

After submitting its 5-year or annual plan to HUD, the agency may amend or modify the plan. If the amendment or modification is significant, it must be adopted by the agency board at a meeting that is open to the public; and may not implement the amendment until notification of the amendment is provided and approved under HUD's plan review procedures.

The PHA plan includes the definitions for whether a modification is considered "significant" or a "substantial deviation / modification.

The authority's definition of a significant amendment is:

"NYCHA will amend or modify its agency plan upon the occurrence of any of the following events during the term of an approved plan:

1. A change in federal law takes effect and, in the opinion of NYCHA, it creates substantial obligations or administrative burdens beyond the programs then under administration, excluding changes made necessary due to insufficient revenue, funding or appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree.
2. Any other event that the authority determines to be a significant amendment or modification of an approved plan."

Let me end here. We are glad to answer any questions you may have. Thank you.

**Testimony by The Legal Aid Society, before the Sub Committee on Public
Housing on The New York City Housing Authority's Annual Plan Process and
Criteria for Amendments
December 7, 2009**

Interest and Expertise of the Legal Aid Society and the Community Service Society

The Legal Aid Society is the oldest and largest provider of legal assistance to the poor in the United States. The Society's Civil Practice operates 14 neighborhood offices and city-wide units serving residents of all five boroughs of New York City, providing comprehensive legal assistance in housing, public assistance, and other civil areas of primary concern to low income families and individuals. The Society is counsel on numerous class-action cases concerning the rights of public housing residents and is counsel to the New York City Public Housing Resident Alliance. The New York City Public Housing Resident Alliance seeks to inform and network with residents, so that they can have a strong and effective voice and secure greater accountability in local, state and federal policy decisions that affect public housing in New York City.

We appreciate the opportunity to testify before the Subcommittee on Public Housing. We have major concerns regarding the Housing Authority's refusal to properly notify NYCHA residents and the larger community of its plans to demolish 267 units of affordable housing, and its on-going failure to properly adhere to the Annual Plan process, in violation of federal regulations.

THE PUBLIC HOUSING AUTHORITY PLAN

Pursuant to federal regulations all public housing authority's (PHA) must submit to the Department of Housing and Urban Development (HUD) a PHA plan. The purpose of the plan is to provide a framework for local accountability and an easily identifiable source by which public housing residents, participants in the tenant-based assistance program, and members of the public

may locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs and services.

There are two types of PHA plans, a Five year plan and an Annual Plan. The Five year plan must be submitted to HUD once every five fiscal years. The Annual Plan which must be submitted to HUD annually includes the discretionary policies of the various plan components or elements. The Annual Plan must also be consistent with the Five Year Plan and outline the goals and objectives of the housing authority.

PHAs must follow specific procedures including notice to the community, public hearings, consideration of all public comments and consultation with the local Resident Advisory Board before adopting their Annual Plans and submitting them to HUD for approval. See 42 U.S.C. § 1437 c-1(b); 24 C.F.R. §§ 903.4 & 903.7(b). Significant amendments or modifications to Annual Plans are subject to the same process as the Annual Plans themselves and may not be implemented without prior submission to HUD for review and approval. See 42 U.S.C. § 1437 c-1(g), (h),(i); 24 C.F.R. §§ 903.21. NYCHA's 2009 Annual Plan lists two criteria, pursuant to 24 C.F.R. §903.7(r)(2)(ii) for determining what constitutes a significant amendment or modification of the Agency Plan, the first refers to changes in federal law; the second refers to "any other event that the Authority determines to be a significant amendment or modification of an approved plan.

NYCHA'S Annual Plan Process for Fiscal year 2010:

NYCHA's Draft Annual Plan for fiscal year 2010, dated May 4, 2009, was made available for public viewing at their main office at 250 Broadway, from May 4, 2009 through June 23, 2009. The public was invited to come to town hall meetings in each borough to raise questions regarding the draft annual plan. NYCHA also held a public hearing on June 23, 2009

to allow comments on the draft annual plan for fiscal year 2010. NYCHA further noted that written comments regarding the draft annual plan must be received no later than June 23, 2009.

NYCHA'S FAILURE TO ADHERE TO THE ANNUAL PLAN PROCESS:

In the last two years, on at least three occasions, NYCHA has enacted new policies without adhering to proper Annual Plan procedures. The failure to notify NYCHA residents, elected officials, and the greater public of changes in the policies, procedures and the future plans of NYCHA flouts federal mandates, and also disregards the very purpose of a public hearing process. The loss of input from residents and the interested community at large not only robs residents of their due process rights, but it also negatively impacts NYCHA as it does not give NYCHA the opportunity to reflect on legitimate concerns that may be raised during the hearing process and amend its proposal accordingly

Prospect Plaza

The May 2009 version of the Annual Plan, which NYCHA submitted to the public for comment, omitted important information. A later substantially modified version of the Annual Plan dated, October 16, 2009 was submitted to HUD by NYCHA. This version of the plan contained new information on NYCHA's plan to demolish the development known as Prospect Plaza. This serious modification of the annual plan for fiscal year 2010 was not made public to NYCHA residents, the larger community, or the elected officials who govern the community in which Prospect Plaza is located. Indeed the tenant entity charged with representing NYCHA residents, the Resident Alliance Board ("RAB") was only notified of NYCHA's plans to demolish Prospect Plaza at a meeting on September 3, 2009 and was not even given an adequate opportunity to draft written comments. The loss of these 267 units of affordable housing will have devastating effects on the residents of Prospect Plaza, as well as the larger community. In a

city like New York, with a tight, high-cost rental market, the loss of hundreds of units of public housing should not be proposed or taken lightly.

Remaining Family Member Grievances

In February 2007 NYCHA adopted a new tenant admissions policy which creates a five-year period of ineligibility for public housing for person facing eviction from a NYCHA apartment in a "licensee holdover proceeding. This change of policy was not adopted after its inclusion in an Annual Plan, subject to public hearing and comment, but by adding it as a new "Standard of Admission" in the Tenant Selection Admission Plan (TSAP). Notably, the Standard for Admission regarding licensees is the only one of twelve listed standards, which is based on no fault of the applicant; rather it penalizes the applicant based upon the actions or inaction by the host NYCHA tenant, who did not have the licensee added to the household composition. This change in admission policy is drastic. In comparison, pursuant to NYCHA's policy persons who have behaved violently or destroyed property, who committed fraud, bribery, or any other corrupt or criminal act in connection with a government housing program or person who misrepresented information and/or have engaged in or threatened abusive or violent behavior toward Housing Authority staff are ineligible for public housing for only three years.

Pet Policy

In March 2009 NYCHA informed residents that they would implement new restrictions on pet ownership. The new pet ownership policy was a substantial deviation from the previous pet policy as it imposed restrictions on species of dogs that residents could own as well as a weight requirement for pets. The new pet policy went into effect as of May 1, 2009, without being noted in a previous annual plan and before NYCHA residents were ever given an

opportunity to comment on the proposed new pet policy. This premature change in NYCHA's well known pet policy proved to be extremely difficult for many residents who were in danger of having to give up their pets or risk losing their homes. In response to the overwhelming outrage from NYCHA residents about this change in policy that was orchestrated without resident input, NYCHA extended the deadline for the old pet policy to January 31, 2010.

SUGGESTED SOLUTIONS:

- (a) All future proposed changes to NYCHA's policies must be outlined in the Annual Plan as mandated by federal regulations.
- (b) In the event NYCHA amends or modifies its plans NYCHA residents and the general public should be notified and given the opportunity to comment on these changes.
- (c) NYCHA should temporarily withdraw the Annual Plan for fiscal year 2010 and re-submit to HUD only after NYCHA is able to hold a new public hearing on the substantial modifications to the plan.

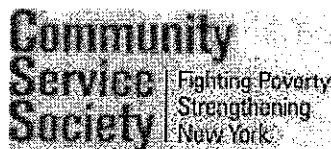
CONCLUSION:

Thank you again for the opportunity to testify before the Subcommittee on Public Housing.

Respectfully Submitted:

Steven Banks, Attorney in Charge
Adriene Holder, Attorney in Charge Civil Practice
Scott Rosenberg, Supervising Attorney Law Reform Unit-Civil
Judith Goldiner, Supervising Attorney
Afua Atta-Mensah, Staff Attorney

THE LEGAL AID SOCIETY
199 Water Street, 3rd Floor
New York, New York 10038
(212) 577-3964



November 19th, 2009

Sandra B. Henriquez,
Assistant Secretary for Public & Indian Housing
U. S. Department of Housing & Urban Development
451 7th Street, S.W.
Washington, D.C. 20410

**RE: HUD Review of Proposed Demolition of Prospect Plaza (NY005002440) , in the
FY2010 Annual Plan Submitted by the New York City Housing Authority (NYCHA)**

Dear Secretary Henriquez:

I am writing to urge HUD to withhold approval of the demolition of Prospect Plaza in Brooklyn, New York, as proposed in the FY 2010 Annual Plan of the New York City Housing Authority (NYCHA). The proposal is a significant change in the authority's draft plan and has not been subjected to a public hearing process as required by the Quality Housing & Work Responsibility Act of 1998.

The Community Service Society of New York (CSS) is a 160 year-old organization based in New York City, which promotes innovative policies that respond to the needs and aspirations of low-income New Yorkers. For the past 15 years, we have worked closely with the city's public housing resident leaders to help them strengthen their voice in government decisions that affect their communities. Our concerns about Prospect Plaza stem from that commitment.

In a city like New York, with a tight, high-cost rental market, the loss of hundreds of units of public housing should not be proposed or taken lightly. The demolition of 267 Prospect Plaza units was not proposed in the NYCHA Draft 2010 Annual Plan at its release in May, 2009 or by the public hearing held on June 23rd, 2009. The demolition proposal surfaced at a Resident Advisory Board (RAB) meeting convened by NYCHA on September 30th, 2009 as an amendment to the Draft Plan. We believe there was insufficient time for the RAB to review the proposal before NYCHA submitted the final Plan to HUD. Nor was the demolition proposal exposed to a public airing, at which the NYCHA resident community—including current and former residents of Prospect Plaza—or the concerned community at large could be heard.

As a consequence, we believe that due process was not observed by NYCHA in this matter. We ask that HUD not approve this part of the Annual Plan unless the proper procedures are observed. It should not be slipped into the Annual Plan without a required public hearing.

HUD Secretary Shaun Donovan has already provided some assurance that HUD will give careful review to any proposed demolition of public housing. In response to a recent request from Representatives Barney Frank and Maxine Waters for a one-year moratorium in the demolition or disposition of public housing, Secretary Donovan wrote in a letter of August 9, 2009: "...discussions are already underway within Public and Indian Housing to review more closely the decisions that will be made regarding the approval of any demolition or disposition...No approvals will be forthcoming without such a close review."

Accordingly, I urge HUD to give a close review to the proposed demolition of Prospect Plaza and to withhold its approval until all options for residents and the broader concerned community to be heard have been pursued. I look forward to your assurance on this matter.

Sincerely yours,

David R. Jones
President and CEO

c.c.

Shaun Donovan, Secretary, U.S. Department of Housing & Urban Development
JoAnna Aniello, Deputy Regional Director, HUD NY/NJ Regional Office
John Rhea, Chairman, New York City Housing Authority
Michael Kelly, General Manager, New York City Housing Authority

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/7/09

(PLEASE PRINT)
Name: JOSEPH H. G. GARDEN

Address: 121 WILSON ST. APT 4F

I represent: N.Y.C. AC 51st Precinct (Elder)

Address: 121 Wilson St. N.Y.C. AC 51st Precinct

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)
Name: SANDY R. RIOS

Address: 205 AVE C N.Y. 10009

I represent: GOLES

Address: 171 AVE B

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☒ in favor ☐ in opposition

Date: 12/7/09

(PLEASE PRINT)
Name: Santos Rivera

Address: 265 Ave C

I represent: GOLES

Address: 169 Ave B

Please complete this card and return to the Sergeant-at-Arms

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: USA BURNISS

Address: _____

I represent: GOLES.

Address: _____

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Appearance Card

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☐ in favor ☒ in opposition

Date: 12-6-2009

(PLEASE PRINT)

Name: DR. GERONIMO L. WILLIAMSON

Address: 113 VERNON AVE

I represent: HANDICAPPED

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☒ in opposition

Date: Dec 7, 2009

(PLEASE PRINT)

Name: H. Anthony Straker

Address: 405 Williams Ave 11207

I represent: Prospect Plaza Eco Dev Corp

Address: 281 Dumont Ave Bklyn 11212

Please complete this card and return to the Sergeant-at-Arms

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: 12/7/09

(PLEASE PRINT)

Name: JOSE HORTIN

Address: 445 E 105 ST APT. 13E

I represent: N.Y.N. 10009

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 11-07-09

(PLEASE PRINT)

Name: MILTON BOLTON

Address: 275 LIVONIA AVE

I represent: PROJECT PLAZA

Address: 281 DUMONT AVE

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: JOSEPH N. NAVES

Address: 55 RUTGERS ST

I represent: GOLES TENANT UNION

Address: _____

Please complete this card and return to the Sergeant-at-Arms

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/7/09

(PLEASE PRINT)

Name: Margarita Lopez

Address: _____

I represent: NYCHA

Address: 250 Broadway

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/7/09

Name: Margarita (PLEASE PRINT) Marie Flatley

Address: NYCHA

I represent: 250 Broadway

Address: 250 Broadway

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

Name: Margarita (PLEASE PRINT) Marie Flatley

Address: NYCHA

I represent: 250 Broadway

Address: 250 Broadway

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/7/09

(PLEASE PRINT)

Name: VICTOR BACH

Address: 105 E 22 ST NYC 10010

I represent: COMMUNITY SERVICE SOCIETY

Address: 105 E 22 ST NYC 10010

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12-7-09

(PLEASE PRINT)

Name: SMUEL DIAZ

Address: 171 AVE B

I represent: GOLES TENATE UNION

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/7/09

(PLEASE PRINT)

Name: Nelson Lung JR

Address: 171 AVE B

I represent: GOLES TENATE UNION

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/9/09

(PLEASE PRINT)

Name: Afua Atta-Mensah

Address: _____

I represent: Legal Aid Society

Address: 99 Canal St NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Angel Seda

Address: 171 Ave B

I represent: GOLES - Good Old Lower East Side

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: Dec 7, 2009

(PLEASE PRINT)

Name: New York Legal Assistance Group

Address: Kamilla Sjodin

I represent: NYLAG

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/7/09

Name: Kamilla S Jadin (PLEASE PRINT)

Address: _____

I represent: NY Legal assistance Grant.

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

Name: Beverly Corbin (PLEASE PRINT)

Address: 130 THIRD AVE 10D

I represent: People in NYCHA.

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

Name: Luther (PLEASE PRINT)

Address: 595 F.D.R. Drive #2B

I represent: Goles NYC 10009

Address: 171 Ave "B" NYC 10009 "Borough"

Please complete this card and return to the Sergeant-at-Arms