

BROOKLYN LEGAL SERVICES CORPORATION



**Partnership for Community
& Economic Development**

**1999 Community
Development Docket**

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INTRODUCTION

[I]f it is really equal justice we are concerned about, then the use of law, the knowledge of law and the role of lawyers means more than simply the availability of a lawyer at the moment a legal defense is required or ... [a] 'test case' is [sought]. Other major elements of the population do not so restrict the term 'legal aid' where they are themselves concerned.

Business [people], individually and in their corporate capacities, use lawyers in a multitude of ways to advance their immediate and long-range interests. Lawyers are prime tacticians and strategists for advancing economic goals of corporations. Lawyers are lobbyists and propagandists. Lawyers are negotiators and advocates in the truest and broadest sense of the term, and not merely when suit has been brought against the corporation.

... The same concept of legal assistance should apply to the poor. ... The new legal aid lawyer's role should be defined by the broadest reaches of advocacy, just as is the role of the corporation lawyer and the labor lawyer and the real estate board lawyer. Central to the new legal aid lawyer's role is the task of helping to articulate and promote the hopes, the dreams, and the real possibility for the impoverished to make the social changes that they feel are needed, through whatever lawful methods are available.

— Edward V. Sparer

It has been more than thirty years since Edward Sparer, one of the principal philosopher-founders of the legal services movement, issued this call to public-interest advocates. Since that time, the country has seen the emergence of a nation-wide legal services structure providing representation to thousands of individuals who may not otherwise have access to justice. But despite these advances, much of Sparer's original message has now been forgotten. Today, Sparer's call for a legal services "defined by the broadest reaches of advocacy" is seldom heard.

For Brooklyn A, however, as for Sparer, effective legal services involves more than the defense of individuals and families facing crises. It involves close collaboration with community residents and ongoing representation of the groups and organizations working to address the long-term needs of their communities. During its 30 years as the primary provider of free legal services to grassroots organizations throughout North and East Brooklyn, Brooklyn A has maintained a firm commitment to such representation. As emphasized in its mission statement:

The Board of Directors, management and staff are dedicated to maximizing the Corporation's effectiveness in serving the community via close and mutually supportive relationships with effective local grass roots organizations that have a demonstrated commitment to our common goal of social and economic justice.

This expansive vision of the role of legal services advocacy has been integral to Brooklyn A's efforts for nearly three decades. From the beginning, Brooklyn A's staff attorneys have been joining forces with local groups to improve the lives of community residents and their families. Over the years, this collaborative process has resulted in the creation of new and rehabilitated housing, the empowerment of tenants, the expansion of health care and childcare services, the development of community centers and nursing homes, and the creation of minority and community-owned businesses and jobs.

¹ Edward V. Sparer, *The New Legal Aid as an Instrument of Social Change*, 1965 U.Ill. L. Forum 57, 59-60 (1965).

In 1986, Brooklyn A decided to institutionalize its commitment to community-building and development through the creation of a specialized Community & Economic Development Unit. Staffed by experienced attorneys, this Unit provides legal assistance to non-profit community-based organizations in the Oceanhill-Brownsville, Williamsburg, Greenpoint, East New York, Cypress Hills, Bushwick, and Canarsie neighborhoods, as well as parts of Bedford-Stuyvesant. Today, the Unit has more than 100 community partners and is recognized as a local and national beacon of success in the building of self-sustaining neighborhoods. The main thrust of the Unit's work involves:

- representation of community development corporations (CDCs) that provide a broad range of programs and services to low-income people
- participation in major development projects in which these CDCs are involved as well as representation of tenants associations seeking to address serious conditions within their buildings, frequently through vehicles of tenant self-management and/or ownership
- grass-roots efforts to change public or private practices which harm low-income residents of North and East Brooklyn

The approach of Brooklyn A's Community & Economic Development team is very much a collaborative one. As Paul Acinapura, Director of the Unit, explains: "We are not saviors in dealing with the problems facing our community and its residents. We are participants in a community-driven, community-controlled response to an injustice."

Over the years, the work of Brooklyn A's Community & Economic Development Unit has come to be seen as a model for other legal services programs throughout the country. In 1993, the Unit was selected by the National Economic Development and Law Center as a "mentor" to help other legal services programs launch similar work. In 1994, it initiated, in collaboration with CUNY Law School, an innovative Housing and Community Development Clinic which won two Legal Services Civil Clinical Program grants. The Unit's work is featured in the video *So Goes a Nation* (sponsored by New York Lawyers for the Public Interest and Fordham Law School) and recent articles in the *New York University Review of Law and Social Change* (Vol. 23, No. 1, Fall 1997) and the *Fordham Urban Law Journal* (Vol. XXV, No.4, Summer 1998).

This Docket provides an overview of Brooklyn A's housing and community development work. It describes the CDCs, tenant associations, and grassroots campaigns represented by Brooklyn A and the scope of that representation. In so doing, it demonstrates the strength of the client-attorney relationship Brooklyn A has developed within the community. More importantly, it bears witness to the extensive range of Brooklyn A's work and the enduring relevance of the original legal services vision. Without the dedicated assistance of Brooklyn A's Community & Economic Development Unit, many of the projects in this docket could not be accomplished.

I. COMMUNITY PARTNERS

A. COMMUNITY DEVELOPMENT ORGANIZATIONS

Brooklyn A has developed a special on-going relationship with some of the largest, long-standing, multi-program organizations serving the low-income residents of North and East Brooklyn. These CDCs are provided with a full range of "house counsel" services. The Community & Economic Development Unit represents them in corporate and tax matters, contract negotiations, drafting and interpreting documents, real estate transactions, administrative, licensing, regulatory and personnel matters, and litigation (other than evictions). It also offers strategy consultation, grant writing, and project coordinating services, as well as analysis of the legal, financial and political implications of program and policy options.

The continuity and breadth of this representation has given Brooklyn A a deep understanding of the special needs of its clients and their communities. It has enabled the Community & Economic Development Unit to build long-term relationships of mutual trust and respect with CDC officers and other community leaders. As counsel to groups which share common interests and engage in similar activities in adjoining neighborhoods, Brooklyn A has been able to facilitate a beneficial exchange of information, sharing of resources, and coordination of proposals, programs and work among the groups it represents.

The following is a partial list of the CDCs currently being served by Brooklyn A as house counsel or special project counsel. Brooklyn A also represents approximately 60 tenant associations in the neighborhoods:

1. Multi-Service Organizations

Bushwick Information Coordinating and Action Committee (BICAC): Developer and manager of low and moderate income and special needs housing, sponsor of commercial revitalization, and provider of social services for youth and senior citizens in the eastern part of Bushwick.

Central Brooklyn Neighborhood Employment Center (CBNEC): Provider of services to help low-income residents of Oceanhill-Brownsville, Bushwick and Bedford-Stuyvesant get and keep decent long-term jobs.

Cypress Hills Local Development Corporation (CHLDC): Sponsor of low-income and special needs housing, child care, inter-generational programs, commercial revitalization and small business development training, counseling, advocacy, family and youth services for residents of the Cypress Hills section of East New York.

East New York Local Development Corporation (ENYLDC): Provider of commercial revitalization job training, job referral and supportive services to low-income community residents, especially the youth.

Northeast Brooklyn Housing Development Corporation (NBHDC): Developer and manager of low-income and special needs housing and provider of commercial revitalization, advocacy and other social services in the northeast section of Bedford-Stuyvesant.

Oceanhill-Brownsville Tenants Association, Inc. (OHBTA): Developer and manager of low-income housing; provider of advocacy and youth services; promoter of worker/community owned businesses; founding participant in the NYC Community Management Program (through which CDCs renovated occupied City-owned buildings and arranged for their sale to the tenants or a non-profit community-based entity).

Ridgewood-Bushwick Senior Citizens Council Inc. (RBSCC): Provider of a diverse range of social, housing, and advocacy services to neighborhood residents of all ages. Since its incorporation, RBSCC has grown from a single storefront facility catering solely to senior citizens to a comprehensive 10-location operation serving more than 10,000 people every year.

St. Nicholas Neighborhood Preservation Corporation (St. Nick's): A community-based multi-service organization serving the neighborhoods of East Williamsburg and Greenpoint. Fondly known as St. Nick's, this organization has an impressive history of developing housing, creating jobs, encouraging businesses, assisting tenant associations and tenant cooperatives, supporting youth, and caring for the elderly.

Southside United Housing Development Fund Corporation (Los Sures): A grassroots, multi-service organization dedicated to the revitalization of Williamsburg's Southside neighborhood. Founded as a local housing development corporation, Los Sures has vastly expanded its programs to include: a management team (responsible for approximately 1,200 units in 90 buildings), a Housing Resources Unit (which provides organizing and technical support to over 40 tenants associations and low-income co-op boards), a senior citizens program, a social services agency, and a support center for victims of domestic violence.

2. Day Care Providers

Children and Parents Day Care Center: A neighborhood-based provider of day care services to low-income families throughout the Williamsburg area.

Nuestros Niños Child Development School (Nuestros Niños): Williamsburg-based operator of one of the largest day care programs in all of New York City. Nuestros Niños serves more than 800 children each year and provides living-wage jobs to dozens of Williamsburg residents.

3. Neighborhood-Based Health Care Providers

Bedford Stuyvesant Family Health Center, Inc. (BSFHC): Principal provider of comprehensive community-based primary health care services for low-income people in Central Brooklyn.

Brownsville Community Development Corporation (BCDC): Principal provider of comprehensive community-based primary health care services for low-income people in East Brooklyn.

Urban Health Plan, Inc.: Principal provider of comprehensive community-based primary health care services for low-income people in the south Bronx.

B. NEWLY FORMED, COMMUNITY-BASED ORGANIZATIONS

Brooklyn A provides legal consultation and representation to North and East Brooklyn community residents who are creating new, smaller neighborhood-based organizations or formalizing long-standing grassroots groups. The activities and programs of these organizations range from athletic, arts, cultural, educational, youth, and recreational services to job training programs. Clients also include tenant and block associations. Sometimes community members come in with an idea of an unmet community need or a vision of what could be done and meet with Brooklyn A staff to discuss how their concepts can be realized. Brooklyn A representation may include: helping select and form the appropriate organizational structure, drafting by-laws, obtaining tax exemptions, and discussing regulatory compliance, directors' responsibilities, funding, organizational development, contracting, and employment issues.

II. CURRENT DEVELOPMENT PROJECTS

A. LOW-INCOME HOUSING

1. Cooperatives

972 Anderson Avenue: A project involving the representation of 8 low-income families threatened with eviction from the formerly abandoned building in which they were homesteading. Although the families had no leases, they had renovated the previously drug-infested and deteriorated building with their own money and labor, and had lived peaceably there for some time. Brooklyn A became counsel to the tenants in June 1998, seven years after they first began renovating the building. Its representation includes: structuring the tenant association as a Housing Development Fund Corporation (HDFC) and limited equity co-op, obtaining New York State acceptance of its co-op status, drafting bylaws, preparing architectural and construction contracts, helping secure rehabilitation financing, and title and loan closing.

2182 Atlantic Avenue HDFC: A 16-unit building rehabilitated through HUD's Section 312 Rehabilitation Loan Program, with technical assistance from OHBTA. After rehabilitation, the HDFC defaulted on its HUD mortgage and its NYC real estate taxes. While litigating HUD's mortgage foreclosure, Brooklyn A negotiated a settlement in which HUD deferred repayment of mortgage arrears and NYC took title to the building (thereby canceling back real estate taxes) and then sold it back to the HDFC for operation as a low-income limited-equity co-op. Other Brooklyn A representation included: reviewing the cooperative offering plan prepared by HPD; explaining the co-op structure to tenants and helping prepare them for co-op ownership; drafting the property management contract and commercial leases; title closing; advice on legal issues facing the co-op Board.

2178 Atlantic Avenue HDFC: A 16-unit building rehabilitated through HUD's Section 312 Rehabilitation Loan Program, with OHBTA technical assistance. This building's financial history is similar to 2182 Atlantic Avenue's. Brooklyn A served as co-counsel with Fried Frank Harris Shriver & Jacobson in the bankruptcy proceeding which enabled the HDFC to avert mortgage tax foreclosure and then permitted restructure of finances so that the HDFC would retain ownership of property.

Hancock Manor: A \$1.75 million NBHDC project involving the acquisition of 4 contiguous abandoned, vacant buildings and their rehabilitation into 16 apartments. The complex also includes a community space and a storefront office for NBHDC. The apartment area is leased to a non-profit co-op corporation under terms that (i) limit membership to low-income households, (ii) assure permanent affordability, and (iii) limit the equity a member can accumulate (a member who leaves the co-op can sell only to the co-op corporation, at a price set by the lease). Financed by the NYS Housing Trust Fund Corporation, NYS Division of Housing and Community Renewal, and NYC Department of Housing Preservation and Development (HPD). Completes renovation of a block of lovely brownstones and revitalization of a commercial strip in the northeastern part of Bedford-Stuyvesant. Occupied September 1992.

Brooklyn A's representation of NBHDC and the subsidiary it formed for this project included: predevelopment coordination; forming the subsidiary and co-op corporation; obtaining the subsidiary's federal tax exemption; drafting and negotiating architectural, construction and property management contracts, the subsidiary's lease agreements with NBHDC and the co-op corporation, and its construction loan and regulatory agreements; title and loan closings; preparing the cooperative offering plan, including subscription agreements and proprietary leases; obtaining the NYS Attorney General's acceptance of the offering plan; negotiating with the NYC Department of Social Services to secure grants that enable public assistance recipients to purchase memberships in the co-op; assistance in obtaining real estate tax abatement; explaining the co-op structure to new tenant/owners and helping them prepare to operate the co-op corporation.

368 Hooper Street: A low-income co-op that was placed in danger of foreclosure when its original absentee owners defaulted on their HUD mortgage. Los Sures wanted to save the building from foreclosure--which would have resulted in the eviction of the current low-income tenants--but could not afford to bid successfully at auction against the speculators who were willing to pay an inflated price for the property. Brooklyn A therefore arranged for Los Sures to purchase the mortgage from HUD and so prevent the foreclosure sale. Brooklyn A is currently working with Los Sures to reorganize the cooperative and enable the current tenants, none of whom are shareholders, to protect their right to remain in the building by acquiring shares and proprietary leases.

Jose Maria Garcia HDFC: A low-income, limited equity residential cooperative with 25 apartments and 5 commercial spaces formed by tenants of buildings that OHBTA rehabilitated through HPD's Community Management Program (CMP). OHBTA currently manages the property and leases a commercial space.

Brooklyn A is counsel to OHBTA and the co-op corporation. Representation included: reviewing the cooperative offering plan prepared by HPD; explaining the co-op structure to tenants and helping prepare them for co-op ownership; drafting the property management contract and commercial leases; title closing; advice on legal issues facing the co-op Board.

376 Keap Street: A Los Sures project involving the purchase of a 40-unit building by its tenants association. The building was in foreclosure when the landlord abandoned it, threatening the tenants with imminent eviction. Brooklyn A successfully defended the tenants association against Freddie Mac, the federal mortgage agency that had been seeking to enjoin its long running rent strike in Federal Court. Brooklyn A then helped form the HDFC which bought the building using the withheld rent, \$325,000. It is now representing the tenants in seeking State Attorney General approval for an expedited "flip" sale from the current HDFC-owned entity (in which the tenants own a share) to a cooperative corporation.

789 MacDonough HDFC: A low-income, limited equity residential cooperative similar to Jose Maria Garcia HDFC, with 41 apartments that OHBTA rehabilitated through CMP. Scope of Brooklyn A representation as in Jose Maria Garcia HDFC.

2185 Pacific Street HDFC: A 16 unit low-income de facto co-op rehabilitated through the tenants' sweat equity. Brooklyn A advises on various legal issues and helps resolve perennial problems with real estate taxes and water/sewer charges.

59 Troutman: A \$260,000 Ridgewood-Bushwick project involving the purchase and rehabilitation of an 8-tenant building threatened with foreclosure. Brooklyn A served as counsel to the tenants in court against the building's landlord and prepared the financial package for the purchase and rehabilitation of the property. In addition, Brooklyn A worked with the Community Service Society's Ownership Transfer Program to transform the building into a low-income, limited-equity residential cooperative. The transfer was financed by Article 8A municipal loans. The purchase and rehabilitation were completed in the Summer of 1998.

2. Mutual Housing

Thomas S. Boyland HDFC: A non-profit corporation formed by OHBTA to purchase and operate low-income rental housing under the governance of a Board of Directors which will include representatives elected by the tenants of each participating building. Formed in 1992, this mutual housing association already has acquired 10 occupied buildings, containing more than 200 apartments, which OHBTA previously rehabilitated through CMP at a cost of \$9.5 million.

Brooklyn A is counsel to OHBTA and the HDFC. Representation included: forming and organizing the HDFC as a mutual housing association; obtaining federal tax exemption; drafting and negotiating loan and regulatory agreements; obtaining abatement of real estate taxes and water and sewer charges; title and loan closings; negotiation with a consortium of City-wide organizations attempting to form a mutual housing trust to support and assist community-based mutual housing associations.

3. Rental Housing

2170 Atlantic Avenue HDFC: A project involving 35 units of formerly City-owned low-income housing which OHBTA rehabilitated through CMP and currently manages for a community-based HDFC owner. Brooklyn A advises the HDFC on business and tax issues, prepared its application for supplemental rehabilitation funds through HPD's 8A Loan Program, and represented it at the loan closing.

Cheryl's Villa: A \$3.5 million NBHDC project involving the acquisition of 5 abandoned, vacant buildings and their rehabilitation to 40 units of low-income rental housing (12 reserved for homeless or doubled-up households). Financed by HPD, with Enterprise Foundation technical assistance, as a federal low-income housing tax credit (LIHTC) syndication. Occupied October 1992.

Brooklyn A is counsel to NBHDC and the business corporation subsidiary and limited partnership it formed for this project. Representation includes: forming the subsidiary and partnership; predevelopment coordination (e.g., environmental audits, insurance coverage, permits); drafting and negotiating architectural, construction and property management contracts; preparing LIHTC submissions and SEC and NYS security filings; partnership, title and loan closings.

Cypress Apartments: A \$2.3 million CHLDC project involving the acquisition of 5 abandoned, vacant buildings and the rehabilitation of 27 units of low-income rental housing (9 reserved for homeless or doubled-up households). Financed by HPD as a LIHTC syndication, with technical assistance from the Local Initiatives Support Corporation (LISC). Scope of Brooklyn A's representation as in Cheryl's Villa. Occupied March 1993.

Cypress Court Apartments: Phase I of the project is a \$2.1 million CHLDC project involving the acquisition of an abandoned, vacant building and the rehabilitation of 15 units of low-income rental housing. Financed by HPD as a LIHTC syndication, with technical assistance from LISC. Scope of Brooklyn A's representation as in Cheryl's Villa. Phase I was occupied in the Fall of 1997. Phase II involves the acquisition of 6 partially occupied and deteriorated city-owned buildings and their rehabilitation for low-income and homeless and doubled-up families. A total of 6 buildings, 57 units, Phase II is a \$6.1 million project. Phase II construction commenced in July 1998.

Dorothy Dublin Houses: A \$7.5 million OHBTA project involving the acquisition of 4 partially occupied buildings for rehabilitation into 82 units of low-income housing. Financed by HPD through its Neighborhood Redevelopment Program NRP with Enterprise Foundation assistance in a LIHTC syndication. Scope of Brooklyn A's representation as in Cheryl's Villa. Occupied February 1999.

1530 Eastern Parkway HDFC: A project involving 8 units of formerly City-owned low-income housing which OHBTA rehabilitated through CMP and currently manages for a community-based HDFC owner. Scope of Brooklyn A's representation as in 2170 Atlantic Avenue HDFC (without 8A Loan).

East Lincoln Houses: A \$5.75 million OHBTA project involving the acquisition of 4 abandoned, vacant buildings and 3 adjoining empty lots and the rehabilitation of 60 units of low-income rental housing (18 reserved for homeless or doubled-up households). The project completed OHBTA's renovation a half-block of community-controlled housing in Brownsville. Financed by HPD, with Enterprise Foundation technical assistance, as a LIHTC syndication. Scope of Brooklyn A's representation as in Cheryl's Villa, plus assistance in obtaining required zoning changes through the municipal urban land use review process ULURP. Occupied March 1994.

120 Gerry Street: A 46-unit housing project that is currently being developed through the joint efforts of Los Sures and St. Nick's. Once completed, half of the apartments will be rented to formerly homeless individuals and families and half will be rented to other low-income tenants. Throughout the development process, Brooklyn A will be working closely with Los Sures and St. Nick's, providing them with legal counsel, technical assistance, and long-range planning and advice.

553 Howard Avenue HDFC: A project involving 12 units of formerly City-owned low-income housing which OHBTA rehabilitated through CMP and currently manages for a community-based HDFC owner. Scope of Brooklyn A's representation as in 2170 Atlantic Avenue HDFC (without 8A Loan).

Hunterfly Houses: A \$5 million NBHDC project involving the acquisition of 9 abandoned, vacant buildings and rehabilitation of 43 units of low-income rental housing (14 reserved for homeless or doubled-up households) and 3 commercial spaces. Financed by HPD, with Enterprise Foundation technical assistance, as a LIHTC syndication. Scope of Brooklyn A's representation as in Cheryl's Villa plus negotiation and litigation arising from contractor default and enforcement of payment and performance bonds (with pro bono co-counsel, Kelley, Drye & Warren). Occupied: December 1996.

Junius J. Watford Houses: A \$4.5 million NBHDC project involving the acquisition of 9 abandoned, vacant buildings and rehabilitation of 43 units of low-income rental housing (14 reserved for homeless or doubled-up households) and 4 commercial spaces. Financed by HPD, with Enterprise Foundation technical assistance, as a LIHTC syndication. Scope of Brooklyn A's representation as in Cheryl's Villa. Occupied: July 1997.

1109 Madison Street HDFC: A \$4.5 million BICAC project involving the acquisition and operation of a new residential building constructed by a private developer on 5 formerly vacant City-owned lots. The project provides 18 units of low-income rental housing (10 reserved for homeless households) and supportive social services. Financed by HPD and the NYS Housing Finance Agency (HFA) through the Permanent Housing For Homeless Families ("85/85") Program, with technical assistance from LISC, as a LIHTC syndication. Occupied in August 1995.

Scope of Brooklyn A's representation as in Cheryl's Villa, plus: formation of a not-for-profit HDFC subsidiary of BICAC which holds title to the property and also operated it for several months prior to LIHTC syndication; obtaining the HDFC's exemption from federal income tax, NYS sales tax and NYC property tax; negotiation of documents that transfer "beneficial interest" in the property to a limited partnership formed by BICAC for this purpose.

Mamie Wiggins Apartments: A \$12 million OHBTA project involving the acquisition of 2 vacant, abandoned buildings and 13 occupied buildings and rehabilitation of 105 units of low-income housing and 4 commercial spaces (2 of which are used for OHBTA community programs). Financed by HPD through its NRP, with Enterprise Foundation technical assistance, as a LIHTC syndication. Scope of Brooklyn A's representation as in Cheryl's Villa. Thirteen buildings completed during 1998; final two occupied February 1999.

Mary R. Wilson-Bilal Houses: A \$13 million OHBTA project involving the acquisition of 9 buildings (6 occupied and 3 vacant) for rehabilitation into 93 units of low-income housing and a commercial space. Financed by HPD through its NRP program with Enterprise Foundation assistance in a LIHTC syndication. Scope of Brooklyn A's representation as in Cheryl's Villa, plus representation in insurance claims arising from vandalism at one site. Expected to complete renovation by June 1999.

Nancy Des Grottes Apartments: A 46-unit new construction project jointly co-sponsored by St. Nick's and Los Sures. The project is financed through the City/State "85/85" program as a LIHTC syndication. Brooklyn A representation as in 1109 Madison Street HDFC. The anticipated closing date is March, 1999, with occupancy to follow approximately one year later.

Oceanhill Housing: A \$1.3 million OHBTA project involving the acquisition of an abandoned, vacant building and the rehabilitation of 18 units of low-income rental housing (6 reserved for homeless or doubled-up households). Financed by HPD, with Enterprise Foundation technical assistance, as a LIHTC syndication. The project completed OHBTA's renovation of a full block of low-income housing in Oceanhill. Scope of Brooklyn A's representation as in Cheryl's Villa. Occupied January 1993.

Putnam-Evergreen Houses: A \$1.7 million BICAC project involving the acquisition of 3 abandoned, vacant buildings in the eastern part of Bushwick and the rehabilitation of 24 units of low and moderate income rental housing. Implemented through a limited partnership with a private development firm serving as managing general partner. Financed by HPD through its Vacant Buildings Program. Occupied May 1990.

Brooklyn A's representation included: incorporating the non-profit subsidiary formed by BICAC for this project; obtaining federal tax exemption; drafting, negotiating and enforcing the limited partnership agreement.

Von King Apartments: A \$6 million NBHDC project involving the acquisition of 6 abandoned, vacant buildings and rehabilitation of 55 units of low-income rental housing (17 reserved for homeless or doubled-up households), and two commercial spaces. Financed by HPD, with Enterprise Foundation technical assistance, as a LIHTC syndication. Scope of Brooklyn A's representation as in Cheryl's Villa. Occupied October 1993.

55 Whipple Street: A 41-unit housing project that is currently being developed through the joint efforts of Los Sures and St. Nick's. Once completed, half of the apartments will be rented to formerly homeless individuals and families and half will be rented to other low-income tenants. Scope of Brooklyn A's representation as in 120 Gerry Street.

4. Special Needs Housing

Arlington Apartments: \$2 million CHLDC project involving the acquisition of 3 vacant, abandoned buildings and rehabilitation of 21 units of low-income rental housing with a community space. Two units are set aside for victims of domestic violence and 3 for the NYS Office of the Mentally Retarded and Developmentally Disabled (OMRDD). Financed by NYS Housing Trust Fund Corporation and Carver Federal Savings Bank (with interest rates subsidized by the Federal Home Loan Bank's Affordable Housing Program). Occupied: December 1995.

Brooklyn A serves as counsel to CHLDC and the non-profit subsidiary it formed for this project. Representation includes: formation and tax exemption of the subsidiary; drafting and negotiating contracts with the architect, general contractor, property manager and OMRDD; negotiating loan and regulatory agreements; title and loan closings.

Bushwick Apartments: A \$4.7 million BICAC project involving the acquisition of 6 contiguous vacant City-owned lots and new construction of 33 units of low-income rental housing. The project will set aside 2 units for veterans, 3 for single-parent households, and 27 for homeless families and individuals. It will include a community space and supportive social services. Financed by HHAC. Expected occupancy: March 2000.

Brooklyn A representation includes: negotiating acquisition of the properties; obtaining real estate tax exemption for the properties; drafting and negotiating acquisition, loan, architectural, construction, property management, and commercial lease agreements; and title and loan closings.

Lucille Rose Manor: A \$4.8 million project involving acquisition of vacant City-owned land and new construction of an elevator building with 54 apartments for senior citizens, plus a community space and supportive social services. Co-sponsored by NBHDC and Wayside Baptist Church, through a jointly-controlled nonprofit HDFC. Financed by HUD's Section 202 Program. Expected occupancy: June 2000. Brooklyn A representation includes: formation, structuring and tax exemption of the HDFC; coordinating environmental inspections and removal of underground oil tanks; preparing an agreement between NBHDC and Wayside governing project development and operation; drafting and negotiating architectural, construction, and property management contracts; title and loan closing.

Throop Court: A \$10.8 million NBHDC project involving acquisition of an abandoned privately-owned factory and an adjacent City-owned building and rehabilitation of this complex to provide 53 apartments for low-income households, with supportive social services. 28 units are set aside for mentally ill people with independent living skills; 25 for formerly homeless households. The complex includes: (i) office and work space for a non-profit provider of supportive services for the mentally ill; (ii) a space to be developed as NBHDC management and social services offices; and (iii) a space to be developed as a childcare, health or social services center. Financed by NYS Homeless Housing and Assistance Corporation (HHAC) with LIHTC syndication, a bridge loan from the EAB Bank, and operating subsidies from the NYS Office of Mental Health. Occupied: October 1996.

Brooklyn A is counsel to NBHDC and to the limited partnership and two subsidiaries that NBHDC formed for this Project. Representation (with pro bono assistance from Richards & O'Neil and Milbank, Hadley, Tweed and McCloy) includes: forming the subsidiaries and partnership; negotiating acquisition of the properties; obtaining real estate tax exemption for the properties and income tax exemption for the nonprofit subsidiary; drafting and negotiating acquisition, loan, architectural, construction, property management, and commercial lease agreements, as well as a complex limited partnership agreement with extensive ancillary documents; title, loan and partnership closings.

5. Homeless Housing

William F. Chisolm HDFC: A turnkey project through which OHBTA (i) leases 21 vacant buildings renovated through HPD's Special Initiatives Program (SIP), (ii) operates the buildings as rental housing for formerly homeless households (and some other low/moderate income tenants), with extensive social services for tenants and their children, and (iii) eventually acquires the buildings through a non-profit subsidiary (HDFC). The Chisolm HDFC has so far acquired 14 buildings with 316 units, which were rehabilitated at a cost of \$18 million. OHBTA is currently leasing 10 other buildings (151 units, rehabilitated at a cost of \$9 million) which the HDFC is expected to acquire in 1999 and 2000. The project's operating budget is partially financed by the NYC Housing Development Corporation and the NYC Department of Youth Services.

Brooklyn A is counsel to OHBTA and the HDFC. Representation included: Brooklyn A representation includes: preparing the proposal which enabled OHBTA to qualify for SIP; forming the HDFC; drafting property management contracts and grant and loan applications; review of loan and regulatory agreements; title closings; tenant orientations; obtaining exemption from federal income and NYC real estate taxes; and obtaining abatement of NYC water and sewer charges.

Aiken Apartments: An NBHDC project involving lease and eventual ownership (through a nonprofit HDFC subsidiary) of 21 rehabilitated apartments for formerly homeless low-income households. Financed by HPD's SIP Program. Scope of Brooklyn A's representation as in Chisolm.

Alberta Woods HDFC: A SIP project similar to Chisolm, sponsored by NBHDC. NBHDC leased 3 buildings with 27 units, which were rehabilitated at a cost of \$2.1 million. The subsidiary it formed for this project (Woods HDFC) acquired the buildings in July 1996. Scope of Brooklyn A's representation as in Chisolm.

Clarence Nell Apartments HDFC: A SIP project similar to Chisolm sponsored by NBHDC. For several years NBHDC leased 2 buildings, with 24 units, rehabilitated at a cost of \$1.8 million. Its subsidiary (Nell HDFC) acquired those buildings in June 1998. Scope of Brooklyn A's representation as in Chisolm.

934-938 Greene Avenue HDFC: A SIP project similar to Chisolm sponsored by NBHDC. For several years NBHDC leased 2 buildings, with 32 residential units, rehabilitated at a cost of \$2 million. Its subsidiary (Green Avenue HDFC) acquired those buildings in June 1998. Scope of Brooklyn A's representation as in Chisolm.

Raymond Ballard Apartments HDFC: A SIP project similar to Chisolm sponsored by NBHDC. NBHDC initially leased 4 buildings, with 45 residential units, and 4 commercial spaces, rehabilitated by HPD at a cost of \$3.5 million. Its subsidiary (Ballard HDFC) acquired those buildings and an adjoining lot in June 1998. Scope of Brooklyn A's representation as in Chisolm.

6. Home Ownership

Cypress Hills Neighborhood Homes: A \$1.8 million initiative to rehabilitate small, substandard, partially occupied, City-owned buildings and provide home ownership for low-income families. Under this program, eleven 1-to-3 family homes were acquired in June 1998 by a CHLDC subsidiary, Cypress Homes HDFC. Current tenants will be relocated during construction. Upon renovation, the buildings will be sold to first time, low income home buyers, including tenants currently in occupancy. Financed by HPD and LISC, with technical assistance from LISC.

Brooklyn A's representation has included negotiating with HPD to structure the program so that it protects CHLDC; formation of corporate subsidiary which took title and will undertake renovation; obtaining federal tax exemption for the subsidiary; title and loan closing of the property from City to CHLDC subsidiary; contract documents with the architect selected to do design work and construction supervision and the construction contractor who will perform renovations; leases with current tenants; structuring sale with first time home buyers purchasing buildings after renovation.

Oceanhill-Brownsville Neighborhood Homes: Similar to Cypress Hills Neighborhood Homes, this project involves the renovation of 14 2-4 family homes to provide 37 apartments at a cost of \$3.5 million. Funded by HPD and a major commercial bank, with technical assistance from Enterprise Foundation. Renovation and re-sale will take place in two phases, with the entire project expected to be completed by end of 2001. Brooklyn A representation as in Cypress Hills Neighborhood Homes.

Southside Partnership Homes: A 164-unit Los Sures-sponsored Partnership Homes construction project which will enable low and moderate-income families to become first-time homeowners. The Partnership Homes program produces 2-family houses for first-time homeowners whose income ranges between \$21,000 and \$53,000. Both the City and the State have joined in subsidizing construction of these homes. The NYC Partnership acts as the developer, while community sponsors are engaged to perform the marketing, publicity, and monitoring of the homes' design and construction.

As counsel for the sponsor, Brooklyn A is assisting Los Sures in negotiating a role in the design and construction of the buildings. In addition, Brooklyn A is representing the interests of the future homeowners by overseeing compliance with construction standards and safety regulations, and ensuring that the project is completed in a timely fashion. The project's estimated budget is \$15 million. Financing is by the Affordable Homes Program and the NYS Housing Partnership.

B. CHILD CARE/EDUCATION

Children and Parents Day Care Center: A neighborhood-based provider of day care services to low-income families throughout the Williamsburg area. Brooklyn A has served as house counsel Children and Parents since its inception (it handled the Center's incorporation). Recently, Brooklyn A represented Children and Parents in a case in which the NYC Agency for Child Development (ACD) was moving to foreclose against the Center's landlord and in the process close the Center down. Brooklyn A helped prevent this disaster and, in the course of its negotiations with the City, succeeded in obtaining a long-term extension of Center's lease.

Cypress Hills Child Care Corporation: A subsidiary established by CHLDC in 1992 to develop quality, affordable child care in the community through the development of several day care initiatives, including:

- 1. Cypress Hills Child Care Center:** A \$1.1 million project to renovate leased space in a local church for use as a child care center. Pre-schooling for 72 neighborhood children per year. Renovation financed by the National Community Development Initiative, NYC Administration for Children's Services, Agency for Child Development (ACD), NYS Empire State Development Corporation, NYS Department of Social Services, U.S. Department of Health and Human Services, with LISC technical assistance. Operating subsidies committed by ACD. Expected to open Spring 1999.
- 2. Cypress Hills Family Care Network:** provides training, start-up loans (through a revolving loan fund), shared resources, group purchasing and technical assistance to enable local residents to become licensed providers of quality child care in their homes.
- 3. Cypress Hills In-Home Head Start Program:** A \$450,000 Head Start project initiated in the Fall of 1997 to provide child care to 46 neighborhood children through a family day care program in the providers' homes. The holistic model integrates child development, health, nutrition, and parental and community involvement. Funded through the U.S. Department of Health and Human Services, the program has expanded to serve 62 children.

Brooklyn A representation to Cypress Hills Child Care Corporation includes: corporate formation; tax exemption; personnel policy; drafting and negotiating architectural, construction, lease and loan agreements; negotiation of relationships with ACD, employees and vendors; structuring Head Start program revolving loan fund; helping guide individual providers through the licensing process.

Cypress Hills Community School (CHCS): A collaborative New Visions public elementary school, sponsored by CHLDC. The school emphasizes parental and community involvement and a holistic perspective on youth development. It utilizes a thematic and dual language (English-Spanish) educational program and an interdisciplinary team-teaching approach to instruction. The school opened in the fall of 1997 with grades K-3, with an additional grade added each year. CHLDC will acquire and develop a community facility to house the full school and other child and family programs.

Brooklyn A representation includes: advice on governance for the school and representation in school facility development (financing, architect and consultants' contracts and construction documents, title and loan closing).

Brooklyn A participates, along with CHCS and CHLDC, in a city-wide collaborative (which includes New York University's Institute for Education and Social Policy, Pratt Institute, LISC, Enterprise, and community-based organizations) working to reduce school over-crowding by enabling CBOs experienced in facilities development to renovate or build new school space and lease it to the NYC Board of Education.

Nuestros Niños Child Development School: A Williamsburg-based operator of one of the largest day care programs in all of New York City. Nuestros Niños serves more than 800 children each year and provides living-wage jobs to dozens of Williamsburg residents. During the course of its 25 years, Nuestros Niños has nurtured over 5000 kids with its holistic philosophy of education for the social, physical, and intellectual growth of both children and their families. Its graduates have attended college in impressive numbers. Included among its many programs are: the child development school, located in large facility in the heart of the Southside; a major family child care program supporting Williamsburg residents who care for other people's children; a large after school program to care for neighborhood children until their parents get home from work; a pre-K program and related educational activities. ACD recently approved Nuestros Niños' ambitious plans to build a second major facility on the under-served Western half of the Southside, which will dramatically increase the number of families that Nuestros Niños serves.

Brooklyn A has served as house counsel to Nuestros Niños since its inception. Recently, Brooklyn A attorneys successfully negotiated a reversal of an ACD decision denying Nuestros Niños an extension on its lease and also negotiated an additional 10-year lease extension. Brooklyn A is currently negotiating the purchase of the main building by Nuestros Niños from its private landlord.

C. HEALTH CARE

Brownsville Family Health Center: A \$6.7 million BCDC project to renovate a 28,000 square foot site for use as a full-service community-controlled diagnostic and treatment center. The new center opened in November 1993. In its first year of operation, 90 full-time staff provided low-income community residents with 50,000 medical and dental visits (including pre-natal, AIDS, social work, and nutritional services). It now employs 140 individuals. Financed through tax-exempt bonds issued by NYS Medical Care Facilities Finance Agency (MCFFA) and insured by State of NY Mortgage Agency (SONYMA); ancillary funding by NYS Department of Health (DOH).

Brooklyn A representation has included: applying for and obtaining a Certificate of Need from DOH; submissions to and appearances before MCFFA, SONYMA, DOH and NYS Public Authorities Control Board; drafting and negotiating architectural, construction, and financing agreements; loan closing; negotiations with investment bankers; review of bond documents and representation of borrower in bond sale; negotiating and structuring managed care agreements.

Brooklyn A's representation enabled a community-based primary health care provider to secure tax-exempt bond financing for the first time in NYS history. Based upon this model, NYC has since established its own Primary Care Development Corporation to promote tax-exempt bond financing for expansion of community-based health care.

Bedford-Stuyvesant Family Health Center: A \$12 million project to acquire and develop a 35,000 square foot facility for use as a full-service community-controlled diagnostic and treatment center providing medical, dental, pre-natal, AIDS, social work, and nutritional services to low-income community residents. Supported by technical assistance and development loans from NYC Primary Care Development Corporation (PCDC). Financed through tax exempt bonds issued by NYS Dormitory Authority and insured by PCDC, plus ancillary funding from NYS DOH. Expected to open December 2000. Brooklyn A's representation as in Brownsville Family Health Center, plus site acquisition and title closing.

Borough Development Group: A BCDC subsidiary which provides technical assistance to help non-profit organizations bring essential health care services to low-income, medically-undeserved communities. It will help such groups to assess the need for additional services and facilities in their communities, to acquire and prepare an appropriate site, and to either establish an organization to provide essential services or develop a mutually beneficial relationship with an independent provider.

Brooklyn A serves as counsel to BDG, representing it the incorporation and tax exemption process and in structuring and negotiating its contractual relations with community groups. Brooklyn A also serves as a consultant, helping BDG provide technical assistance to community groups.

Brownsville Halfway House: A BCDC project providing a 21-bed facility for recovering alcohol and substance abusers and a 100-slot outpatient program of alcohol and substance abuse counseling. The facility was renovated by the NYS Office of Alcohol and Substance Abuse Services at a cost of \$1.25 million. Operations are funded by the NYS Division of Alcoholism and Alcohol Abuse and the NYC Department of Mental Health, Mental Retardation and Alcoholism Services. Occupied: August 1997.

Brooklyn A is counsel to BCDC and the non-profit subsidiary it formed for these programs. Representation includes: corporate formation and tax exemption; Certificates of Need for the in-patient and out-patient programs; negotiating of funding contracts and an agreement to lease and eventually purchase the facility; title and loan closings.

Urban Health Plan, Inc.: A \$12 million project involving the construction of a new 34,000 square foot facility which will serve as the new home for its community health center. The center provides a full range of medical, AIDS, pre-natal and social work services. In its new facility it will add dental and nutrition services as well as expand its capacity to provide a range of services in its current practice areas. Financing will be provided through the sale of tax-exempt bonds by the Dormitory Authority of New York State, with additional assistance from New York City's Primary Care Development Corporation.

Construction is expected to begin in September of 1999 with completion by January of 2001. Brooklyn A representation as in Brownsville Family Health Center, plus site acquisition and title closing.

D. COMMUNITY AND WORKER-OWNED BUSINESSES

Central Brooklyn Fedayeen Construction Company: A worker/community-owned company performing light construction primarily in residential apartments. It was formed by OHBTA to (i) enable community residents to gain jobs and marketable skills from housing and public facility construction work in Central and East Brooklyn, and (ii) retain in those communities a greater share of the capital generated by such projects. Organized late in 1991, the company has obtained sufficient work to employ a full-time staff of 8.

As counsel to the construction company, Brooklyn A's representation includes: forming the firm as a NYS business corporation; reorganizing it as limited liability company; drafting an operating agreement which enables the company to establish worker co-ownership with OHBTA; orienting prospective worker-owners; serving as liaison with accountants and business consultants; preparing funding applications; drafting and negotiating loan and construction agreements.

OHB Security Corporation: This company formed by OHBTA and licensed by NYS in July 1994 now employs more than 200 community residents as security guards. OHBTA is preparing to offer co-ownership to longtime employees. Brooklyn A's representation as in the construction company, plus the NYS licensing process.

Al Maida Restaurant: A neighborhood restaurant currently being developed by OHBTA, with a plan for eventual worker co-ownership. Brooklyn A's representation as in the construction and security companies.

Fountain of Life Restaurant: An OHBTA-managed outdoor café and take-out restaurant in the center of Oceanhill. The Fountain of Life serves food in keeping with Islamic dietary habits as well as caters events of all types.

The Good Find Thrift Shop/La Buena Compra, Inc.: Thrift store created by CHLDC as a job training and entrepreneurial development program and to offer low cost quality goods to neighborhood residents. Financed by federal funds matched by private contributions raised by CHLDC. Opened in Summer 1997. Brooklyn A's representation included establishing the corporate entity, obtaining tax exemption, review of business plan, lease of store space, contract with architect and construction contractor to undertake store renovations, assistance in structuring training program.

E. COMMUNITY FACILITIES

Cypress Hills Mini-Mall: A project of CHLDC, the Cypress Hills Mini-Mall is currently in pre-development. CHLDC has been awarded a \$300,000 grant from the U.S. Department of Health and Human Services Office of Community Services, a \$150,000 grant from the NYS Economic Development Corp, and additional grants from a number of banks. CHLDC is currently negotiating for site control and an anchor tenant.

Brooklyn A's representation includes: structuring the joint venture and drafting/negotiating the joint venture agreement; analyzing financial feasibility, reviewing loan agreements, commitment letters, consultant agreements, leases and other essential documents; structuring and creating ownership entity; and title and loan closing.

Cypress Hills National Cemetery Caretaker's Lodge: The U.S. Veterans Administration had planned to demolish this historic structure in the Cypress Hills section of East New York, but agreed instead to lease it to CHLDC for renovation as a museum, historic archive, community meeting space, CHLDC office and home for a needy veteran (the caretaker). A \$200,000 project financed by NYS Department of State, NYS Historic Preservation Office, Nonprofit Facilities Fund, Astor Foundation and Brooklyn Union Gas. Occupied: August 1994.

Brooklyn A's representation included: drafting and negotiating CHLDC's agreements with the Veteran's Administration, architect and general contractor; liaison with funders; title A and loan closing.

Greenpoint Renaissance Enterprise Corporation (GREC): A coalition of six major neighborhood organizations in North Brooklyn, GREC successfully developed, proposed and sponsored the implementation of a plan for the re-use of what had been the old Greenpoint Hospital campus. The plan imaginatively rehabilitated the old hospital buildings and transformed them into intergenerational housing, primary care health facilities, a nursing home, and senior citizen housing. Shortly after that plan was adopted by the City, the City began using some of the old buildings as temporary shelters for the increasing homeless population. What began as a facility for 200 homeless men, soon became a huge warehouse for over 1200 people. Not only was the surrounding residential area disrupted, but the GREC plan for the campus was indefinitely delayed.

As counsel to the Coalition (a position it has held since GREC's inception), Brooklyn A led the litigation and negotiations that led to the reduction of the homeless facility to a manageable two hundred residents, with significant supportive programs. As a result of the settlement, the GREC plan has moved forward and a number of the facilities have already been built.

Brooklyn A is currently representing the coalition before state agencies to secure the various approvals required for the nursing home. In addition, it has formed the Article 36 corporation, which will be responsible for running the health care facility located on the site. It is currently in the process of negotiating leases and memoranda of understanding with two potential operators of the facility.

Rockaway Avenue Mall: A 37,500 square foot shopping center, with on-site parking for 88 cars, to be developed and operated by ENYLDC in a joint venture with two private developers. The shopping center would include a one story structure for Associated Supermarket (the anchor tenant) and a two story building for retail uses on the first floor and for office space on the second. It is estimated that this project will create 150 permanent jobs. The development budget is \$4,868,000: \$618,000 from venture equity; \$500,000 from New York State Loan; \$3,750,000 from bank loans.

Brooklyn A's representation includes: structuring the joint venture and drafting/negotiating the joint venture agreement; analyzing financial feasibility, reviewing loan agreements, commitment letters, consultant agreements, leases and other essential documents; title and loan closing.

160 South Second Street: A Los Sures Project situated on the former site of a NYS residential facility for the mentally disabled. The land is owned by the State and will be sold for \$300,000 to Los Sures at a fraction of its market value. After lengthy negotiations with State agencies, Brooklyn A helped draft the legislation allowing for the property's direct sale to Los Sures. It then formed a for-profit subsidiary of Los Sures to purchase the building. At present, Brooklyn A is negotiating the contract of sale. It is also working with Los Sures to decide how to develop this site, which will ultimately be home to a number of new facilities. Brooklyn A will continue to play an active role throughout the remainder of the development process.

F. EMPLOYMENT AND BUSINESS OPPORTUNITIES

The North and East Brooklyn CDCs and their community-based development projects function as major generators of employment for community residents. The projects have created hundreds of well-paid jobs for local residents hired to carry out demolition, renovation and construction. Hundreds more have found meaningful, productive long-term employment in building maintenance, management and security, in CDC administration, and in the myriad community-based service and educational programs carried out by the CDCs. OHBTA, for example has become the second largest private employer in Oceanhill-Brownsville, with a permanent, full time workforce of 245 employees. Similarly, CHLDC, with more than 200 employees, is now one of the largest private employers in East New York.

While all of the CDCs create jobs through their own activities, some also operate specific programs to help local residents find work with other employers.

Central Brooklyn Neighborhood Employment Center: CBNEC is funded by the New York City Partnership (NYCP) and the NYC Human Resources Administration (HRA) to provide a broad range of services to low-income community residents seeking to find, retain and upgrade employment. It provides job skills assessments, job readiness workshops, job matching and placement services, employment counseling, and referrals to childcare, educational, and job training programs as well as access to the resources required for an effective job search (e.g., job postings, computers, telephones, fax machines). Its relationships with local and city-wide employers have enabled CBNEC to generate on-the-job training opportunities and other entry-level positions, resulting in permanent employment for 200 community residents, with a 70% retention rate.

Brooklyn A s representation of CBNEC includes: corporate formation, bylaws, application for state and federal tax exemption, negotiation of agreements with HRA, NYCP and a community-based fiscal sponsor (pending receipt of federal income tax exemption), and consultation on a personnel practices manual.

Elva McZeal Learning Center: The Elva McZeal Tenants Association HDFC (see p. 20) is the sponsor of the Elva McZeal Computer Learning Center, whose mission is to help participants become economically self-reliant; to raise the level of their expectations for themselves, families, and communities; and to encourage them to serve as agents of change and facilitators of self-growth in the process. The Center has three components: office technology and skills training, job partnership/placement, and small business development.

The office technology and skills training component, known as Women in Leadership in Leadership through Technology, provides six months of computer training and development on site at the Elva McZeal Apartments to the buildings' tenants and the surrounding community. The job partnership/placement program matches businesses and other employers with recent graduates and provides ongoing support to them. The small business development component helped launch Urban Power Processing!, a word processing/desk-top publishing business which operates from the site and provides a full complement of services at competitive prices.

The innovative program is a collaboration between the Tenants Association, HUD (which has provided funding for the program), and Chocolate Chips Electronic Office, Inc., a Central Brooklyn based nonprofit which is responsible for conducting the computer training classes.

OHBTA Business Outreach Center: OHBTA's Business Outreach Center Network (BOC) provides linkages between local entrepreneurs and CBOs to support business and commercial development in Oceanhill-Brownsville. It provides individualized assistance in all phases of business development from concept to daily management. The creation of new businesses will keep capital in the community as neighborhood residents will no longer need to leave the community to purchase goods and services, and the businesses will provide local employment opportunities.

The BOC also provides strategic resource management and consultant services through the Ujamaa PILLAR (People's Institution to Leverage Local Areas Resources) Program. (Ujamaa is a Kiswahilli, East African coastal trade language word meaning "cooperative economics.")

III. GRASSROOTS CAMPAIGNS

A. TENANT ASSOCIATIONS

A significant part of Brooklyn A's group representation work is performed in support of local tenant associations and the tenant organizers employed by its partner organizations. Brooklyn A lawyers work with the tenants and their organizers to help rectify hazardous living conditions and restore critically needed services, including heat and hot water. Often these efforts lead to the tenants, with the critical ongoing assistance of the organizers, taking responsibility for managing and ultimately owning the buildings in which they live, frequently in the form of tenant cooperatives. Brooklyn A helped revive a previously unused statute (RPAPL Article 7A) to effectuate court ordered transfers of management from irresponsible landlords to community organizations. Brooklyn A currently represents approximately 60 tenants associations and tenant cooperatives. Some recent examples of the organization's work in this regard include:

1. *Federally Subsidized Housing*

Elva McZeal Apartments: This \$8 million, 143-unit federally-subsidized low-income housing project in East New York was acquired by HUD in 1983 and rapidly re-sold to private owners at a small fraction of its initial cost. The new owners proceeded to pocket HUD rent subsidies while providing few services and allowing the buildings to deteriorate. By 1993, they had accumulated more than 500 outstanding code violations that endangered tenants' health and safety.

At that point, Brooklyn A – representing the Elva McZeal Tenant Association—sued HUD and the private owners on the theory that tenants are third-party beneficiaries of HUD rent subsidy contracts. As a result of this litigation, the U.S. District Court appointed a receiver to collect rent and make repairs. In this context, and with the owners facing Federal investigation into possible felony charges, Brooklyn A negotiated transfer of title to the Tenant Association without compensation (other than assumption of property tax debts). Brooklyn A also negotiated a HUD commitment to continue rent subsidies.

The Tenant Association took ownership in February 1995. Its victory received national attention as a model of tenant-initiated action to improve low-income housing. Its story was featured by NBC Dateline on March 31, 1995, and since then in *Newsday* and the *Daily News*.

Brooklyn A continues to serve as counsel to the Tenant Association. It represented the Association at title closing and helped it to incorporate, re-organize as a housing development fund company, obtain federal and state tax exemption, and secure technical assistance in organizational capacity-building and basic property management skills (thereby enabling the tenants to select and supervise a professional management company). Brooklyn A is currently working with HPD, HUD, and a private lender to obtain loan guarantees and financing for major capital improvements in its buildings and to resolve tax arrears.

Gates Avenue Houses: On April 17, 1997, Brooklyn A achieved the ouster of one of the most notorious owners of Section 8 Housing in the United States from the management of the project (see *New York Times*, 6/23/97, page 1). Based upon the allegation of criminal conversion of project funds by the purported owner, Allen Bird and his management company, RPS Management Inc., the Secretary of HUD, Andrew Cuomo, announced the debarment of Alan Bird from participation in ownership of HUD subsidized projects. This debarment is currently the subject of litigation by Bird and his company against the Secretary. A Federal Grand Jury in the Eastern District of New York is currently investigating, among other things, the allegations of criminal wrongdoing first articulated against Bird and RPS Management Inc. in the civil RICO suit.

The most important immediate result of this success has been the dramatic transformation of the Gates Avenue project itself. The new management, put into place by the federal court, has effectuated scores of building repairs and improvements and has rid the project of trespassers and loiterers who had plagued the tenants because of lack of security in the buildings. As a result of Brooklyn A's lawsuit, HUD took title to the project in July 1997. In May 1998, the tenants settled their damage claim and withdrew their suit in exchange for \$300,000 earmarked for an on-site computer learning center.

Medgar Evers Houses: This 315-unit Section 8 housing project located in Bedford-Stuyvesant directly across from Gates Avenue Housing has been cited as one of the worst housing projects in New York City. The tenants came to Brooklyn A as the direct result of what they saw being accomplished by their Gates Avenue Housing neighbors.

Brooklyn A, with pro-bono assistance from Patterson, Belknap, Webb & Tyler, sued the owners and management of the project. Rather than face a motion to oust them from management, the defendants stipulated to being replaced by a court-appointed receiver. The receiver took over management on June 18, 1997, and has taken major steps to rehabilitate the project.

Dismissal of the law suit is currently pending appeal before the Second Circuit Court of Appeals. Argument is set for July 30, 1999.

Noble Drew Ali Plaza: Despite huge HUD subsidies to their private landlord, the tenants of this 354-unit low-income project suffered broken elevators, raw sewage, power failures, and rampant drug sales and violent crime. To force changes, the tenant association launched a rent strike, with support from OHBTA. Brooklyn A prevented the eviction of the tenants and, with the Legal Department of Chase Manhattan Bank as co-counsel, commenced affirmative federal litigation (as in *Elva Mc Zeal*). This action won the appointment of a federal receiver to manage the property. Subsequently, title was transferred to a newly created community based not-for-profit corporation, Noble Drew Ali Plaza Housing Corporation, which Brooklyn A serves as counsel. The Noble Drew corporation is now undertaking the complete renovation of the premises, made necessary by decades of abandonment and neglect by the former owners. The renovations, costing nearly \$10,000,000, will be funded by a private construction lender and repaid through the sale of tax-exempt bonds by New York City's Housing Development Corporation. Construction Loan Closing is expected in Summer of 1999.

The allegations of criminal embezzlement of project funds first asserted by the tenants in their civil RICO action prompted a grand jury investigation of Linden Reality's operation of the project. After an investigation lasting more than 18 months, the principals of Linden Reality were indicted and charged with stealing and conspiring to steal more than \$2 million of project funds over the 7-year period that they managed the project.

Brooklyn A is representing the not-for-profit owner in the construction loan closing and the long term tax-exempt bond financing. Its representation also includes drafting or reviewing, and negotiating, construction, architectural, property management and related contracts.

Willard J. Price Houses: A 192-unit project next door to the Gates and Medgar Evers Houses in Bedford-Stuyvesant. Brooklyn A convinced HUD to launch mortgage foreclosure proceedings against the ownership of the houses and simultaneously to oust its management company from daily operation and control of the project. (The management company, BPC Management, was essentially the same entity that had been previously ousted from management from Medgar Evers houses through a RICO suit). In January, 1998, the US District Court for the Eastern District of New York granted HUD's application to oust BPC and appoint a reputable, independent management company to operate the premises during litigation. During the intervening year, however, HUD failed to adequately finance the receivership. Therefore, at the request of the tenants, Brooklyn A has commenced a legal proceeding against HUD, seeking an order to correct the large number of housing code violations that continue to exist. HUD has had the case removed from New York City Housing Court to the Federal District Court in the Eastern District of New York, where it is currently pending.

Williamsburg Houses Task Force and 4th Floor Residents Committee: For over six years, Brooklyn A has represented the “4th Floor Tenants Committee” and the Williamsburg Houses Task Force in addressing and ameliorating the disruptions caused by the forced relocation of over 400 families in the largest renovation project ever done in a public housing development in the country.

On behalf of the tenants, Brooklyn A helped persuade the NYC Housing Authority to stagger structural roof repairs at Williamsburg Houses, the second oldest public housing project in the United States. In addition, Brooklyn A lawyers negotiated written protocols that: protected tenants' rights to return to their original apartments, expanded their choice of apartments to which they could move, increased and clearly stated the relocation benefits that were to be made available, enhanced security and reduced disruptions to other residents during construction, and maximized the number of tenants who were provided jobs by the \$60 million renovation contract. In order to ensure maximum compliance with these protocols, Brooklyn A succeeded in establishing periodic review meetings between representatives of the Authority, contractors, tenants and the Community Board. Finally, the Housing Authority agreed to construct a \$5 million community center for the project tenants as a form of reparations for the inconvenience and suffering that was inflicted on those tenants.

2. *City-Owned Housing*

East New York Homesteaders: The NYC Department of Housing Preservation and Development (HPD) moved to dispossess 13 low-income families, demolish structurally sound City-owned buildings and construct fewer units of middle-income housing. Although the families had no leases, they had renovated the previously drug-infested and deteriorated buildings with their own money and labor, and had lived peaceably there for several years. Brooklyn A has successfully defended against repeated attempts to evict the homesteaders and has represented one homesteader in negotiations which resulted in HPD's conveyance of her homestead to a community organization which agreed to give her title to the building (while retaining ownership of the land).

838-848 Park Place: HPD placed 3 City-owned buildings with 24 apartments in its Private Ownership Management Program (POMP), which involved operation and eventual ownership by a private landlord, frequently leading to gentrification. The tenants, assisted by OHBTA and the Union of City Tenants, organized a rent strike and demanded low-income co-op ownership through HPD's CMP or TIL (Tenant Interim Lease) programs. Brooklyn A successfully defended against two attempts to evict the tenants and helped negotiate the removal of the buildings from POMP.

18 Schaefer Street: On behalf of the tenants of this NYC-owned property, Brooklyn A sued to: (1) invalidate the City's claim of exemption from state and municipal housing laws; (2) compel it to keep occupied, City-owned housing in good repair; and (3) stop its “Consolidation Program” of demolishing such housing after it falls into disrepair. The NYS Appellate Division unanimously affirmed a NYS Supreme Court decision granting the tenants summary judgment on the first two claims and refusing to dismiss the third. Brooklyn A's success in this case marks a major victory for the more than 65,000 low-income households living in City-owned apartments.

3. *Privately Owned Properties*

209 Atkins Avenue: When the private owner abandoned this 6 unit low-income building in Cypress Hills, the tenants organized to manage the building themselves. The owner initiated eviction proceedings, but Brooklyn A won a dismissal. The mortgagee then foreclosed, and Brooklyn A represents the tenant association in litigation against the mortgagee to obtain essential repairs.

544 Hemlock Street: Representing the tenants of this 23-unit low and moderate income building, Brooklyn A has obtained judicial repair orders and substantial rent abatements and initiated court proceedings for long-term rent reductions.

530 Herzl Street: Representing the tenant association of this 46-unit low and moderate income building, Brooklyn A intervened in a mortgage foreclosure proceeding and secured appointment of an acceptable receiver to manage the building. It then persuaded the receiver to cease substantial rent overcharges imposed by the former owner.

551 Ridgewood Avenue: Following mortgage foreclosure, this 9 unit low-income building in Cypress Hills was abandoned by the owner, who made no effort to maintain decent living conditions. Representing the tenant association, Brooklyn A sought and obtained court appointment of an administrator under NYS Real Property Action & Proceedings Law, Article 7A, to collect rents and make repairs.

22 Scholes: A St. Nick's project involving the purchase of a foreclosed building with an absentee owner and an inactive receiver. Brooklyn A represented the tenants association in the purchase of the mortgage and the conclusion of the foreclosure action. Acquisition will be financed entirely by money from the rents that the tenants had been withholding from the owner. The project is expected to be completed by April, 1999.

57 Sutter Avenue: Brooklyn A obtained judicial repair orders for the tenants of this 5 unit low-income building in Brownsville.

59 Ten Eyck: A St. Nick's project involving the purchase of a mortgage from an out of state investor. Brooklyn A is currently negotiating the purchase of this mortgage by the building's tenants. The Executive Director of St. Nick's has served as the Court-Appointed Administrator of the premises. A \$250,000 renovation is going on at the present time.

869 Thomas Boyland Avenue: Representing the tenant association of this 30 unit low-income building in Brownsville, Brooklyn A obtained judicial repair orders and long-term rent reductions.

B. COMMUNITY COALITIONS

Brooklyn Unidos: This coalition of Latino groups from throughout Brooklyn was developed to promote the interests of the borough's Latino communities. Over the years, it has attracted federal, state, and city officials, as well as leaders of businesses, foundations, and non-profit organizations to share ideas and become more familiar with the Brooklyn Latino community. Brooklyn A has served as counsel to Brooklyn Unidos since its inception, and has provided direct services to community organizations that have presented themselves at Unidos meetings or are implementing Unidos-inspired projects.

Brownsville Jail: The NYC Department of Juvenile Justice announced construction of a juvenile pre-trial detention facility on a Brownsville site previously designated for a new public high school which had never been built. The decision was opposed by a coalition of block and tenant associations, merchants and community activists. As counsel to that coalition, Brooklyn A obtained a state court order, since reversed on appeal, enjoining construction pending a full environmental review of the physical and social impact of the proposed facility.

Bushwick Committee to End Lead Paint Poisoning: A coalition organized by Bushwick Community Service Society, local block associations and community activists to press the NYC Department of Health to inspect area buildings and actively enforce lead paint laws. Brooklyn A provided legal advice, assisted in community education, and helped prepare a City-wide class action lawsuit to compel lead paint inspections and enforcement of lead paint laws.

Community Reinvestment Committee/Community Forum on Banks: This campaign was organized by CHLDC and the City-Line Coalition (block associations and community activists working to improve neighborhoods near the Brooklyn-Queens border). The coalition's aim is to reform the lending policies of financial institutions in East New York so that low and moderate-income local residents can get financing for home purchases and renovation. The committee is also part of a city-wide coalition focused on deleterious impact of the lending practices of a major savings and loan association.

As co-counsel (with the Neighborhood Economic Development Advocacy Project and New York Law School Prof. Rick Marsico), Brooklyn A provided analysis of Community Reinvestment Act and fair housing requirements and advised on negotiations with local officials and bank officers.

Comprehensive Foreclosure Action Program: A campaign organized by CHLDC and the City-Line Coalition to stem the abandonment of privately-owned housing. Program includes public education, counseling of homeowners and tenants, a \$1 million distressed properties' revolving loan fund, and CHLDC acquisition, rehabilitation and resale of vacant bank and City-owned properties. Brooklyn A represents CHLDC in the acquisition and resale process and assists in counseling homeowners and tenants.

East New York-Brownsville HIV/AIDS CARE Network/Williamsburg-Greenpoint-Bushwick HIV/AIDS CARE Network: Two separate coalitions of community-based health care, social service, education and advocacy organizations. Funded by Ryan White Title II monies, these coalitions promote HIV/AIDS education and co-ordinate and develop HIV/AIDS services throughout North and East Brooklyn. Brooklyn A is an active member of both Networks, drafted their Bylaws and Operating Procedures, and has provided legal advice on specific issues.

Essex Street Incinerator: East New York community groups learned early in 1995 that a private biochemical company had secured NYS authorization to build a large waste wood incinerator dangerously close to child care centers, schools, a convalescent home, churches and two large, densely-populated public housing projects. Brooklyn A, along with the NAACP Legal Defense Fund, NYPIRG, and NY Lawyers for the Public Interest, represented a coalition of community groups which joined with the Brooklyn Borough President's office to articulate strong opposition to the proposed location of the incinerator. In June 1995, the NYS Dept. of Energy Conservation ruled that the incinerator could not be built without approval from the NYC Dept. of Environmental Protection (DEP) under the NYC Environmental Quality Review procedure. When the DEP refused to grant approval of the incinerator, the plan was abandoned.

Forbell Street Shelter: Without any public hearing or other community consultation, the NYC Human Resources Administration moved to transform a women's pre-trial detention center across the street from a local elementary school in the Cypress Hills section of East New York into a shelter for homeless single adult male drug and alcohol abusers. The action was opposed by the local community board, local elected officials and the City-Line Coalition, a confederation of local block associations. As counsel to the opponents, Brooklyn A initiated an unsuccessful lawsuit to enjoin NYC from violating its own Urban Land Use Review Procedure (ULURP).

Lets Build IS 171 Committee: A group of Cypress Hills parents and community residents organized to oppose the interim transfer of some grades from the over-crowded local public school to other neighborhoods and to advocate expeditious construction of a new local school. As co-counsel (with Advocates for Children), Brooklyn A represented the Committee at NYC Board of Education hearings and appeals and before the NYS Commissioner of Education.

When NYC finally began building a new school, a local food manufacturer sued to enjoin construction contending that it had an alleged agreement with government agencies to exchange the proposed school site for land owned by the manufacturer. On behalf of the Committee, Brooklyn A filed a "friend of the court" brief, and the food manufacturer was ultimately unsuccessful in this litigation. When the

Committee attempted to communicate with elected representatives and the media regarding the impact of the failure to build the school, the manufacturer brought a defamation action. Brooklyn A is currently defending this suit as co-counsel, with Paterson, Belknap, Webb & Tyler LLP, and has filed a counter-claim against the manufacturer under civil rights statutes designed to protect the public's right to freedom of speech. As a result of the Committee's decade-long advocacy, construction of a new elementary school commenced in the Spring of 1998 and is proceeding on an expedited schedule.

Navy Yard Incinerator Coalition: Brooklyn A played a leading role in the representation of this coalition of community groups opposed to the construction of a massive 47 story garbage incinerator in the Brooklyn Navy Yard. The Coalition was part of a united Hasidic-Latino effort to guard Williamsburg's residential neighborhoods from further industrial encroachment. Brooklyn A served as co-counsel in federal and state litigation that delayed the plan until there was adequate input, review, analysis and discussion by the affected communities. This litigation, combined with residents' ensuing input, ultimately compelled the City to abandon the incinerator plan.

Neighbors Against Garbage (NAG): Brooklyn A served as co-counsel in this community-wide effort to challenge the City's plans to accommodate the closing of the Fresh Kills landfill by expanding garbage transfer stations along Williamsburg's waterfront. Brooklyn A participated in litigation to force the City to follow procedures ensuring maximum community input and prior consultation before the adoption or revision of the City's Solid Waste Management Plan. This litigation, along with the coalition's efforts, has led the City to withdraw its initial plan.

North Brooklyn Coalition Against Family Violence, Inc.: This recently-formed coalition of North Brooklyn groups is dedicated to providing services and support to the rising numbers of victims of domestic violence in the area. As counsel to the Coalition, Brooklyn A developed its articles of incorporation, drafted its by-laws, secured its federal tax exempt status, and oversaw its filings with the Attorney General's office. Brooklyn A remains an active presence in the Coalition, which includes Alternatives For Women (AFW), Los Sures, St. Nick's, Nuestros Niños, the Ridgewood-Bushwick Senior Citizens Council, and others. Brooklyn A's staff also provide direct legal services to the Coalition's clients, including helping them to secure Orders of Protection, addressing child custody issues, and representing them in Housing Court.

Southside Task Force: A coalition of Southside Community organizations and leaders who meet on a monthly basis to coordinate their activities and update each other on their plans and projects. Among the initiatives that the Task Force has promoted are the Southside Partnership Homes and the North Brooklyn Coalition Against Family Violence. The Task Force hosts presentations by community leaders, local police, hospital administrators, governmental officials, and representatives of neighborhood banks, businesses, and related institutions. Brooklyn A has served as counsel to the Task Force since it was formed.

"Tin House" Closing: In 1987, NYC Mayor Koch closed the main Oceanhill-Brownsville fire house, Engine Company 232, on Super Bowl Sunday. The City had held no prior discussion with the community. It had not even given advance notice of its intention. On behalf of the local community board and a broad coalition of local elected officials and community groups, Brooklyn A filed a civil rights suit to prevent the closing and block destruction of the building. Plaintiffs' claims of racial discrimination and violation of the NYC Urban Land Use Review Procedure (ULURP) survived the City's motion to dismiss. The City Council subsequently passed legislation which requires 30 days' notice before similar closings, and the building has not been torn down.

Williamsburg Bridge Task Force: This task force was formed in 1988 shortly after the discovery of serious structural faults in the Williamsburg Bridge. It was founded by neighborhood residents anxious to have a role in the evaluation of plans for the reconstruction/replacement of the Bridge. As counsel to the task force, Brooklyn A played a critical role in ensuring this participation and in averting plans that would have displaced or destroyed large segments of the low-income community. Several years later, Brooklyn A came together once again with many of the groups from the Task Force when it served as co-counsel to a coalition of neighborhood groups from both the Manhattan and Brooklyn sides of the Williamsburg Bridge. This coalition succeeded in halting the dangerous blasting of lead paint on the Bridge and won the adoption of safe and tightly monitored paint removal procedures.

APPENDIX

TENANT ASSOCIATIONS AND TENANT COOPERATIVES Ongoing Representation (Partial List)

Building Address	Sponsoring Organization	Building Address	Sponsoring Organization
452 Bedford Avenue	Los Sures	177 Knickerbocker Avenue	RBSOC
454 Bedford Avenue	Los Sures	223 Knickerbocker Avenue	RBSOC
437 Bleecker Street	RBSOC	527-531 Knickerbocker Avenue	RBSOC
1041 Bushwick	RBSOC	265 Lee Avenue	Los Sures
38 Catherine Street	St. Nick's	273 Lee Avenue	Los Sures
284 Cooper Street	RBSOC	364 Leonard Street	St. Nick's
104 Division Avenue	Los Sures	392 Marcy Avenue	Los Sures
108 Division Avenue	Los Sures	394 Marcy Avenue	Los Sures
279 Division Avenue	Los Sures	177-181 Maurjer Street	St. Nick's
287 Division Avenue	Los Sures	103 Meserole	St. Nick's
774 Driggs /168 South 3rd Street	Los Sures	141 Meserole	St. Nick's
235 Driggs Avenue	St. Nick's	143 Meserole	St. Nick's
878 Driggs Avenue	Los Sures	180 & 182 Meserole	St. Nick's
305 Eldert Street	RBSOC	621 Metropolitan	St. Nick's
147 Freeman Street	St. Nick's	79 Monitor	St. Nick's
611 Grand Street	St. Nick's	177 Montrose	St. Nick's
1417 Greene Avenue	RBSOC	44 Morgan Avenue	St. Nick's
116-120 Grove Street	RBSOC	510 Morgan Avenue	St. Nick's
1351 Hancock Street	RBSOC	330 Rodney Street	Los Sures
109 Harman Street	RBSOC	210 Roebing Street	Los Sures
101 Harrison Avenue	Los Sures	40 Scholes	St. Nick's
869 Hart Street	RBSOC	140 Scholes	St. Nick's
930 Hart Street	RBSOC	364 South 1st Street	Los Sures
167 Havemeyer Street	Los Sures	159 South 2nd Street	Los Sures
252 Heyward Street	Los Sures	202 South 2nd Street	Los Sures
378 Hooper Street	Los Sures	265 South 2nd Street	Los Sures
161 Java Street	St. Nick's	278 South 2nd Street	Los Sures
322 Jefferson Street	RBSOC	229 South 3rd Street	Los Sures
185 Johnson Avenue	St. Nick's	234 South 3rd Street	Los Sures
527 Knickerbocker	RBSOC	300 South 3rd Street	Los Sures

ASSOCIATIONS AND TENANT COOPERATIVES

Ongoing Representation (Partial List)

Building Address	Sponsoring Organization	Building Address	Sponsoring Organization
304 South 3rd Street	Los Sures	100 South 8th Street	Los Sures
310 South 3rd Street	Los Sures	190 South 8th Street	Los Sures
312 South 3rd Street	Los Sures	69 South 9th Street	Los Sures
340 South 3rd Street	Los Sures	101 South 9th Street	Los Sures
195 South 4th Street	Los Sures	156 South 9th Street	Los Sures
256 South 4th Street	Los Sures	315 Troutman Street	RBSCC
343 South 4th Street	Los Sures	205 Wilson Avenue	RBSCC
272 South 5th Street	Los Sures	223 Wyckoff Avenue	RBSCC
341 South 5th Street	Los Sures	175 Jefferson Street	RBSCC