

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOROTHY GAUTREAUX, *et al.*,

Plaintiffs,

V.

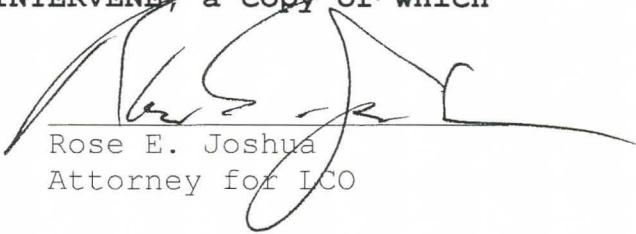
NO: 66 C 1459

CHICAGO HOUSING AUTHORITY, *et al.*,
Defendants.

NOTICE OF MOTION

TO: See attached Certificate of Service

PLEASE TAKE NOTICE that on Tuesday, December 14, 2001, at 9:30 a.m., I shall appear before the Honorable Marvin E. Aspen, and shall present the attached **MOTION OF LAKEFRONT COMMUNITY ORGANIZATION (LCO) TO INTERVENE**, a copy of which is hereby served upon you.


Rose E. Joshua
Attorney for LCO

December 5, 2001

Rose E. Joshua
Attorney at Law
77 West Washington Street, Ste. 1314
Chicago, Illinois 60602
312 263 0238

RECEIVED
DEC - 5 2001
MICHAEL J. CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

DEC - 5 - 1985

DOROTHY GAUTREAUX, *et al.*

Plaintiffs,

MICHAEL W.
CLERK, U.S. DISTRICT COURT

vs.

No: 66 C 1459

Judge Marvin E. Aspen

CHICAGO HOUSING AUTHORITY, *et al.*

Defendants.

**MOTION OF LAKEFRONT COMMUNITY
ORGANIZATION (LCO) TO INTERVENE**

LAKEFRONT COMMUNITY ORGANIZATION ("LCO"), by counsel, Rose E. Joshua, moves the court for leave to intervene for the purpose of protecting the rights of former Lakefront tenant families. In support of said motion, LCO states as follows:

1. Rule 24(a)(2) of the Federal Rules of Civil Procedure allows intervention of right where the applicant seeking intervention claims to be so situated that a ruling or disposition of the action may as a practical matter impair or impede the applicant's ability to protect that interest, unless the applicant's interest is adequately represented by existing parties.
2. Rule 24(b)(2) of the Federal Rules of Civil Procedure also permits intervention when an applicant's claim or defense and the have a question of law or fact in common.
3. LCO is the sole representative of displaced tenant families who resided in six Lakefront properties (3939 S. Lake Park Avenue, 3983 S. Lake Park Avenue, 4040 S. Oakenwald Street, 1130 E. 41st Street, 4155 S. Lake Park Avenue and 1132 E. 42nd Street) as of October 1, 1985 who were displaced by the proposed Lakefront properties rehabilitation project.

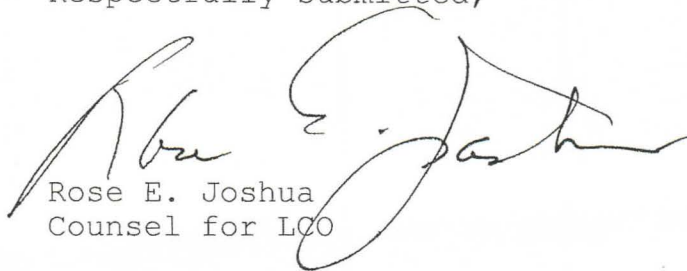
4. On or about September 22, 1995, the LCO and Defendant, Chicago Housing Authority (CHA) and/or its receiver, Habitat Company entered into a revised agreement to build and rehabilitate Lakefront properties for displaced Lakefront tenant families. (LCO Exhibit A, Revised Agreement).
5. The Department of Housing and Urban Development has provided funding to CHA and its receiver to build housing units.
6. Among the few housing units that have been built, the LCO believes that no units have been provided to displaced Lakefront tenant families. According to the revised agreement, families displaced from the Lakefront buildings have first priority for the first 441 units to be built.
7. CHA contends that there are no eligible Lakefront tenant families available to take the few units that are available. (LCO Exhibit B, see affidavit of Lillian Fuentes, Defendant's Response to Plaintiff's Motion to Show Cause, paragraph two (2)).
8. CHA further state (See Affidavit of Lillian Fuentes paragraphs) that LCO has identified only ten (10) families eligible for new units.
9. Since 1997, LCO has turned over to CHA (Occupancy Department) a list of over one hundred eligible (100) families who had been processed by LCO. (LCO Exhibit C, correspondence from LCO to CHA's Occupancy Department).
10. It would appear from the affidavit of Lillian Fuentes, that since 1995, there has been little or no activities by CHA to relocate displaced Lakefront tenant families.
11. Further, it would appear that CHA has processed no information through its agency to relocate displaced Lakefront tenant families. If CHA has, it has not provided that information to LCO.
12. According to the revised agreement, paragraph eleven (11), it is the sole responsibility of

CHA to conduct an aggressive outreach campaign to contact eligible displaced Lakefront tenant families. The LCO duty is to assist CHA with its efforts.

13. CHA has not (according to the Revised Agreement) entered into any arrangement and/or side agreement with LCO to facilitate the outreach program.
14. Due to erroneous allegations and/or misinformation (Affidavit of Lillian Fuentes) brought before the court on or July 20, 2001, the court entered an order that may prejudice the rights of displaced Lakefront tenant families. (LCO Exhibit D, order of court, dated July 20, 2001.)
15. CHA has not attempted to work with the LCO regarding its outreach efforts. It would appear from the record that the only outreach efforts, if any, by CHA has commenced this year.
16. The bar date (December 31, 2001) set by CHA is unrealistic and prejudice the rights of eligible displaced Lakefront residents who have not been notified by CHA.
17. For the foregoing reasons, LCO should be granted permission to intervene as a matter of right, or, in the alternative, should be granted permissive intervention since there are common questions of fact and law between LCO's claims and this cause.
18. It would appear that CHA's actions are adverse to LCO's interest. It is the responsibility of CHA to conduct an aggressive outreach program. The CHA has not made any effort to seek LCO's assistance regarding its outreach to displaced Lakefront tenant families.
19. LCO is not a party to this case and Plaintiff or Defendant does not represent LCO's interests.

WHEREFORE, LCO moves the court to intervene in order to file its attached complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rose E. Joshua". The signature is fluid and cursive, with the first name "Rose" and last name "Joshua" clearly distinguishable.

Rose E. Joshua
Counsel for LCO

Rose E. Joshua
Attorney at Law
77 West Washington Street, Ste. 1314
Chicago, Illinois 60602
312 263 0238

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DOROTHY GAUTREAUX, *et al.*

Plaintiffs,

vs.

No: 66 C 1459

Judge Marvin E. Aspen

CHICAGO HOUSING AUTHORITY, *et al.*

Defendants.

COMPLAINT AT LAW

INTRODUCTION

1. LCO is the sole representative of displaced tenant families who resided in six Lakefront properties (3939 S. Lake Park Avenue, 3983 S. Lake Park Avenue, 4040 S. Oakenwald Street, 1130 E. 41st Street, 4155 S. Lake Park Avenue and 1132 E. 42nd Street) as of October 1, 1985 who were displaced by the proposed Lakefront properties rehabilitation project.
2. On or about September 22, 1995, the LCO and Defendant, Chicago Housing Authority (CHA) and/or its receiver, Habitat Company entered into a revised agreement to build and rehabilitate Lakefront properties for displaced Lakefront tenant families. (LCO Exhibit A, Revised Agreement).
3. The Department of Housing and Urban Development has provided funding to CHA and its receiver to build housing units.
4. Among the few housing units that have been built, the LCO believes that few, if any, units have been provided to displaced Lakefront tenant families. According to the revised agreement, families displaced from the Lakefront buildings have first priority for the first 441 units to

be built.

5. CHA contends that there are no eligible Lakefront tenant families available to take the few units that are available. (LCO Exhibit B, see affidavit of Lillian Fuentes, Defendant's Response to Plaintiff's Motion to Show Cause, paragraph two (2)).
6. CHA further state (See Affidavit of Lillian Fuentes paragraphs) that LCO has identified only ten (10) families eligible for new units.
7. Since 1997, LCO has turned over to CHA (Occupancy Department) a list of over one hundred eligible (100) families who had been processed by LCO. (LCO Exhibit C, correspondence from LCO to CHA's Occupancy Department).
8. It would appear from the affidavit of Lillian Fuentes, that since 1995, there has been little or no activities by CHA to relocate displaced Lakefront tenant families.
9. Further, it would appear that CHA has processed no information through its agency to relocate displaced Lakefront tenant families. If CHA has, it has not provided that information to LCO.
10. According to the revised agreement, paragraph eleven (11), it is the sole responsibility of CHA to conduct an aggressive outreach campaign to contact eligible displaced Lakefront tenant families. The LCO duty is to assist CHA with its efforts.
11. CHA has not (according to the Revised Agreement) entered into any arrangement and/or side agreement with LCO to facilitate the outreach program.
12. Due to erroneous allegations and/or misinformation (Affidavit of Lillian Fuentes) brought before the court on or July 20, 2001, the court entered an order that may prejudice the rights of displaced Lakefront tenant families. (LCO Exhibit D, order of court, dated July 20, 2001.)
13. CHA has not attempted to work with the LCO

regarding its outreach efforts. It would appear from the record that the only outreach efforts, if any, by CHA has commenced this year.

14. The bar date (December 31, 2001) set by CHA is unrealistic and prejudice the rights of eligible displaced Lakefront residents who have not been notified by CHA.

JURISDICTION AND VENUE

15. This court has jurisdiction of the claims presented by LCO pursuant to 28 U.S.C., Section 1331 and 1367.
16. Venue is proper under 28 U.S.C., Section 1291 (b).

PARTIES

17. LCO is a non-profit organization, organized pursuant to state law and has been representing Lakefront tenant families since 1985. In 1985 LCO negotiated the Memorandum of Accord and The Revised Agreement in 1995.
18. CHA is an Illinois municipal corporation, created and existing pursuant to state law.
19. Habitat Company is the court-appointed receiver, which has the responsibility of building housing units for displaced Lakefront tenant families.
20. CHA has breached the terms of the 1995 Revised Agreement:
 - a) CHA has not built replacement housing for displaced Lakefront tenants within a reasonable time.
 - b) Of the units that have been constructed and/or rehabilitated, CHA has not offered them to relocates on a first priority basis pursuant to paragraph eight (8) of the revised agreement.
 - c) CHA has not attempted to reach an agreement with LCO with respect to all matters involving the displaced Lakefront tenant families, including site selection and design of constructed and rehabilitated housing and

planned construction pursuant to paragraph ten (10) of the revised agreement.

- d) CHA and/or its Receiver, Habitat Company, has not complied with Section 3 requirements in construction of housing units in that CHA has not worked with LCO in identifying members of displaced Lakefront tenant families as eligible for training and employment opportunities. CHA has not, directly or through its agent, provided training for interested residents regarding management and operation of replacement housing units that will be provided.
- e) CHA has not conducted an aggressive outreach program with the assistance of LCO to contact eligible displaced residents.

WHEREFORE, LCO pray as follows:

1. The court enter an order against CHA and/or its Receiver, Habitat Company requiring CHA and/or its Receiver, Habitat Company to show cause why it has not built replacement housing for Lakefront tenant families within a reasonable time.
2. The court enter an order requiring CHA to present to the Court and/or the LCO a report of its outreach activities, including but not limited to, list of names, addresses, and phone numbers of the Lakefront tenant families who were displaced, list of Section 8 recipients, list of ineligible Lakefront tenant families, detail listing of cost of outreach activities since 1985.
3. The court enter an order requiring CHA and its Receiver, Habitat Company to make an accounting of the HUD funds that have been provided to build replacement housing for Lakefront tenant families.
4. The court grant such further relief the court deems fit and proper.

Respectfully submitted,

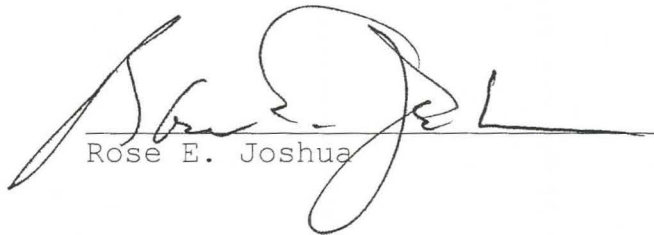
A handwritten signature in black ink, appearing to read 'Rose E. Joshua', with a long horizontal flourish extending to the right.

Rose E. Joshua
Counsel for Lakefront
Community Organization

Rose E. Joshua
Attorney at Law
77 West Washington Street, Ste. 1314
Chicago, Illinois 60602
312 263 0238

CERTIFICATE OF SERVICE

I, Rose E. Joshua, an attorney certify that on December 5, 2001, I caused copies of the foregoing Motion of Lakefront Community Organization To Intervene to be served upon the persons whose names appear on the attached service list.


Rose E. Joshua

SERVICE LIST

Chicago Housing Authority
G. A. Finch, General Counsel
Lillian Fuentes
200 West Adams Street #2100
Chicago, Illinois 60606

Thomas E. Johnson
Johnson, Jones, Snelling, Gilbert & Davis
36 South Wabash Avenue #1310
Chicago, Illinois 60603

Michael L. Shakman
Edward W. Feldman
Miller, Shakman, Hamilton, Kurtzon & Schlifke
208 South LaSalle Street- #1100
Chicago, IL 60604

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT COURT OF ILLINOIS
EASTERN DIVISION

DOROTHY GAUTREAUX, et al.,

Plaintiffs,

-vs-

CHICAGO HOUSING AUTHORITY, et al.,

Defendants.

No. 66 C 1459

Hon. Marvin E. Allen

RECEIVED

JUN 29 2001

MICHAEL E. JOHNS
CLERK, U.S. DISTRICT COURT

DEFENDANT CHA'S RESPONSE TO PLAINTIFFS' MOTION TO SHOW CAUSE

The CHA responds to Plaintiff's Motion to Show Cause as follows:

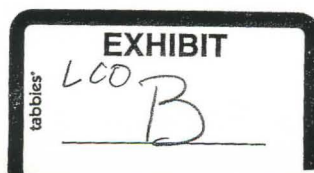
There Will Soon Be 24 Vacant Lakefront Scattered Site Units

1. There are currently twelve vacant scattered site units in the Kenwood-Oakland area. These units were developed by the Receiver and turned over to CHA. Some were turned over as long ago as December of 2000.

2. There are an additional twelve scattered site units in the Kenwood-Oakland area that the Receiver has nearly finished. These units were originally to be completed in April of 2001, see the Receiver's April 20, 2001 Quarterly Report. It now appears that six units will be transferred to CHA on June 29, 2001 and six more units will be transferred in July, 2001—no later than July 27, 2001.

CHA Is Obligated To Give Eligible Displaced Lakefront Families First Priority For These Units

3. These units, as well as others in and outside of the Kenwood-Oakland community, are being built to replace the CHA properties demolished at 3939 S. Lake Park Ave., 3983 S. Lake Park Ave., 4040 S. Oakenwald St., 1130 E. 41st St., 4155 S. Lake Park Ave., and 1132 E. 42nd St. (hereafter "the Lakefront buildings"). The residents of the Lakefront buildings were relocated to permit demolition. These families are represented by the Lakefront Community Organization (hereafter "the LCO"). In 1995, the LCO and the CHA entered into a "Revised Agreement Regarding Former Residents of the Lakefront Properties and the Future Use of Those Properties", a copy of which is appended hereto as Exhibit A. This agreement, among other things, guarantees:



1) that eligible displaced Lakefront tenant families shall have first priority for the 241 new units being built on the Lakefront site, the Drexel site, in the Kenwood-Oakland neighborhood, as well as for the 200 new scattered-site units to be built outside the Kenwood-Oakland neighborhood (par. 8); and 2) that the LCO and CHA will conduct an aggressive outreach campaign to contact eligible displaced Lakefront tenant families to determine if they wish to take advantage of the new replacement units, and that a "bar date" will be fixed by which all eligible families must be identified, (par. 11).

4. In its Lakefront Revitalization Order, dated June 3, 1996, this Court required CHA to honor that provision of its agreement with LCO that gives eligible displaced Lakefront families a first priority on the new housing, (par. 3). A copy of this Order is appended as Exhibit B. (In later Orders dated May 6, 1999 and July 1, 1999, this Court invalidated those portions of the LCO-CHA agreement that related to the development of the new units. Copies of these Orders are appended as Exhibit C.)

5. In accordance with this Court's Revitalization Order and its agreement with the LCO, CHA has always accorded eligible displaced Lakefront families first priority for the new units. Only 5 units were given to other CHA families. This occurred in 1998 and 1999 when there were no eligible displaced Lakefront families available to occupy these units. In addition to the Lakefront families placed in newly constructed public housing units, 326 eligible, displaced Lakefront families who opted for Section 8 vouchers were provided these vouchers. See the Affidavit of Lillian Fuentes, appended as Exhibit D.

6. Also, since 1995, in accordance with its agreement with the LCO, CHA (together with the LCO) has conducted aggressive outreach campaigns to identify all eligible displaced Lakefront families. This has included advertising in three local newspapers, as well as on the radio, mailings, and funding an office and staff for LCO (in the amount of \$17,000 per month). LCO, on its own, has also conducted numerous outreach activities. See the Affidavit of Lillian Fuentes, appended as Exhibit D.

**To Date, The LCO Has Not Identified Sufficient Eligible Displaced
Lakefront Families To Occupy the New Scattered-Site Units**

7. Despite these outreach activities, LCO has identified only fourteen displaced Lakefront families in the eighteen months prior to June 14, 2001. Of these fourteen, ten were eligible for the new units (in that they were still income-eligible, did not owe CHA rent, had not committed crimes, etc.). Despite CHA's repeated requests, the LCO would not or could not provide any additional families. Further, since January 1, 1999, the LCO has attended only three of the regularly-scheduled Lakefront Working Group meetings that involve the Receiver, CHA, Draper & Kramer, the Community Builders and others actively participating in the planning and development of these units. See, the Affidavit of Lillian Fuentes, appended as Exhibit D.

8. After CHA was served with the Gautreaux plaintiffs' Motion to Show Cause, CHA wrote counsel for the LCO (Mr. Stuart Jones) to, among other things, advise him of the pendency of plaintiffs' motion. In the letter, CHA asked the LCO to provide "all information currently in its possession on the identity and location of displaced Lakefront tenant families by June 18th, including all information on families we can immediately screen for occupancy", p.3. A copy of this letter is appended as Exhibit E.

9. On June 17, 2001, Mr. Jones called CHA to say that he no longer represents the LCO, and that his services were terminated several days earlier. CHA then wrote Izora Davis, president of the LCO, on June 25, 2001 asking again for all information she has about displaced Lakefront families. A copy of this letter is appended as Exhibit F. On June 28, 2001, the undersigned counsel spoke directly with Ms. Davis and urged her to provide any and all Lakefront families, so that their first priority for the units could be preserved.

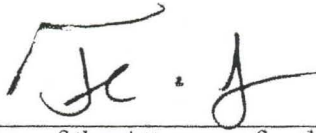
10. In response to these letters and CHA's repeated demands for eligible families, LCO did turn over information on thirteen additional Lakefront families. Ten of these families are eligible for the new housing and have now been screened by CHA's occupancy personnel. These ten families will be housed in the twelve units that are now vacant. Ms. Davis and LCO, however, have not provided any additional families for occupancy.

CHA's Proposed Plan For Lakefront Occupancy

11. In light of the availability of the (long-awaited) new public housing units on the Lakefront and the absence of identifiable, eligible, displaced Lakefront families, CHA proposes that the Court modify its June 3, 1996 Revitalization Order, insofar as it relates to occupancy, to provide as follows:

- A. Eligible displaced Lakefront families will continue to have first priority for all of the 441 new units to be built as Lakefront Replacement Housing; ok
- B. To the extent that eligible, displaced LCO families have not been identified by July 23, 2001, for the 12 existing vacant units and the 12 additional units coming on line June 29th and in July, these units shall be filled in accordance with the Tenant Assignment Plan for scattered-site housing previously approved by this Court;
- C. The Tenant Assignment Plan currently approved by this Court requires that 50% of new scattered-site units be allocated to eligible community residents, 25% allocated to CHA residents on the CHA Transfer List, and 25% allocated to needy families on the CHA Waiting List. CHA will seek a modification of the Tenant Assignment Plan, permitting CHA to assign Lakefront scattered-site units (not claimed by Lakefront families) to relocatees from other CHA developments, rather than to families on the CHA Transfer List or the CHA Waiting List;
- D. In the future, the Receiver shall continue to notify both CHA and the LCO of the estimated transfer dates for new units (as the Receiver regularly has done in the past, see Exhibit G hereto). Within 30 days of receiving the initial notice of a unit's estimated transfer date, the CHA (in consultation with the LCO) shall identify an eligible, displaced Lakefront family to occupy that unit. If no such family can be identified within this thirty-day period, then that unit shall be made available to a non-Lakefront family in accordance with this Court's Tenant Assignment Plan; and
- E. No later than September 15, 2001, the CHA shall complete a plan for finally identifying the universe of eligible, displaced Lakefront families, complete with a bar date which will cut off all further claims to replacement housing by displaced Lakefront families, and thereafter CHA shall implement this plan.

12. CHA believes that the foregoing plan will respect the "first priority" rights of the Lakefront families, while ensuring that units are not vacant and that the Gautreaux plaintiffs continue to receive the remedial relief they deserve.



One of the Attorneys for the CHA

G.A. FINCH
General Counsel
LILLIAN FUENTES
CHA Legal Department
200 W. Adams St., 21st Floor
Chicago, IL 60606
(312)791-8415

THOMAS E. JOHNSON
Johnson, Jones, Snelling, Gilbert
& Davis
36 S. Wabash Ave., Suite 1310
Chicago, Illinois 60603
(312) 578-8100

Attorneys for the CHA

AFFIDAVIT OF LILLIAN FUENTES

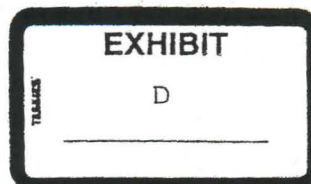
Lillian Fuentes, being first duly sworn on oath, states as follows:

1. I am an Associate General Counsel for the Chicago Housing Authority and, in this capacity have had responsibility for, among other things, the CHA's participation in the Lakefront redevelopment program.

2. I am familiar with the manner in which newly-constructed Lakefront public housing units have been occupied. CHA has always given a first priority to those eligible, displaced families from the Lakefront properties that were demolished. These are the properties and families identified in the Revised Agreement Regarding Former Residents of the Lakefront Properties and the Future Use of Those Properties, executed by CHA and the Lakefront Community Organization ("LCO") in 1995. The only time units were provided to needy families other than Lakefront families was in 1998 and 1999, when five units were allocated to other CHA families since there were no eligible, displaced Lakefront families available to occupy these units. In addition to giving the LCO families first priority for the new units being built, CHA has provided 326 Section 8 vouchers to eligible, displaced Lakefront families who sought this form of assistance instead of a new unit.

3. Since 1995, CHA and the LCO have conducted aggressive outreach campaigns to identify all eligible, displaced Lakefront families. This has included advertising in three local newspapers, as well as on radio, doing mailings and funding an office for LCO and its staff. Currently, CHA pays LCO \$17,000 per month for its office's expenses in outreach efforts.

4. Despite these outreach activities, LCO had identified only fourteen displaced Lakefront

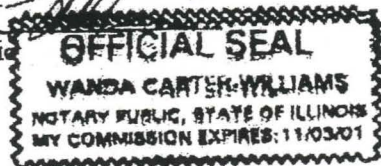


families in the eighteen months prior to June 14, 2001. Of these fourteen, ten were eligible for the new units. After June 14, 2001, the LCO identified thirteen additional Lakefront families, ten of whom now appear eligible for the new units.


Lillian Fuentes

Signed and sworn to before me
on this 29th day of June, 2001


Notary Public



CHICAGO HOUSING AUTHORITY
OCCUPANCY DEPARTMENT

55 WEST CERMAK
CHICAGO, IL. 60616

INTER-OFFICE MEMO

TO: DUANE WALKER, DIRECTOR

FROM: LENORA BOYD-HARRIS, RELOCATION

DATE: DECEMBER 5, 1997

RE: RELOCATION/KENWOOD/OAKLAND/LAKEFRONT

On this date I Lenora Boyd-Harris received the following files from Izora Davis to process for the Kenwood/Oakland Area :

Shanna Brown	2br
Rena Love	2br
Linda Boose	2br
Laytunya Culverson	3br
Juanita Lewis	1br

Received by

L. Boyd

Date:

12-5-97

Delivered by

Juanita Lewis

Date

12-5-97

4216



INTEROFFICE MEMORANDUM

TO: LENORA BOYD-HARRIS
FROM: IZORA DAVIS
SUBJECT: RELOCATION/KENWOOD/OAKLAND/LAKEFRONT
DATE: MARCH 17, 1998
CC: DUANE WALKER, DIRECTOR OF OCCUPANCY

On this date I Lenora Boyd-Harris received the following files from Izora Davis to process for the Kenwood/Oakland Area:

Michelle Davis-Marcus	3br
Angela Green	2br
Mary Montgomery	3br
Pauline Jones	3br

Received by

K Clayton

Date:

3/18/98

Delivered by:

J. Peters

Date:

3/18/98

INTEROFFICE MEMORANDUM

TO: DENISE JOHNSON
FROM: IZORA DAVIS
SUBJECT: LAKEFRONT RELOCATEE APPLICATION'S
DATE: 08/18/00
CC: JOHN ROBERSON, CEDRIC HAMPTON, SHARON GLENN[CLICK HERE AND TYPE NAME]

These are Lakefront relocatee application for replacement housing.

Each and every one I have verified.

Please sign below in receiving these applications.

1. Katherine Browner (emergency housing). 2 bedroom
2. Audrey Motes- 4 bedroom.
3. Larevia L. Williams- 2 bedroom

Received from:

Izora Davis

Accepted by:

Gloria Ledger 8/18/00

INTEROFFICE MEMORANDUM

TO: JOHN ROBERSON
FROM: IZORA DAVIS
SUBJECT: RELOCATION/REPLACEMENT HOUSING/LAKE FRONT
DATE: AUGUST 18, 1999

This is a list of names of relocatees files that have been sent to Chicago Housing Authority Occupancy over a period of time.

- | | |
|----------------------|-----------------------|
| 1. James Ball | 16. Tamika King |
| 2. Taleisha Ball | 17. Lillie Lanier |
| 3. Tyrone Barksdale | 18. Juanithia Lee |
| 4. Linda Boose | 19. Juanita Lewis |
| 5. Shanna Brown | 20. Cherry Liner |
| 6. Katherine Browner | 21. Rena Love |
| 7. Latanya Culverson | 22. Michelle Marcus |
| 8. Leroy Delphie | 23. Mary Montgomery |
| 9. Maurice Delphie | 24. Mercedes Palm |
| | 25. Dora Patterson |
| 10. Renee Henderson | 26. Michael Randolph |
| 11. Beatrice Hill | 27. Robert Snowden |
| 12. Tracy Hill | 28. Leslie Stewart |
| 13. Pamela Jackson | 29. Eddie Thompson |
| 14. Pauline Jones | 30. Felicia Walls |
| 15. Benita Jordan | 31. Veneshia Williams |

INTEROFFICE MEMORANDUM

TO: JOHN ROBERSON
FROM: IZORA DAVIS
SUBJECT: MONTHLY REPORT/REPLACEMENT HOUSING/LAKE FRONT PROPERTIES
DATE: AUGUST 19, 1999

THIS IS A LIST OF RELOCATEES THAT THE LAKE FRONT OUT REACH
OFFICE HAS CONTACTED TO SUBMIT PAPERS TO COMPLETE A FILE ON
THEM FOR REPLACEMENT HOUSING.

KRISTY BOULWARE
ALBERTA LAWSON
CHARLES HOWARD
PAUL WATSON
SHERRY BELL
LYRETHA STOKES
CAROLYN KING
TONY HOLLINS
HARVEY STANFORD
THERESA COLE
CALVIN HOWARD
WILLA WILLIAMS
CHARLES COLE
CARNELL WILLIAMS
CEDRICK WILLIAMS

Memo

To: Denise Richards, Occupancy Department
 From: Izora Davis, Lakefront Community Organization
 Re: Eligible Relocatee Files
 Date: 6/13/01

Please find below a list of eligible Lakefront Relocatees and their attached files. If there are any questions and/or concerns, please feel free to contact me at (312) 674-4189 or (312) 674-4166.

Name	Address	Phone	Number in household
Mary Montgomery	8319 S. Commercial	773-374-4297	4
Nariya Keaton	4219 S. Ellis	773-536-4638	2
Virginia Jones	8440 S. Muskegon	773-734-7856	2
Alice Keaton	4219 S. Lake Park	773-536-4638	2
Denise Pollard	4009 S. Ellis #111	773-548-0444	1
Latifat Aghalaya	5422 S. Calumet	773-373-8465	6
Andrea White	64 E. 48 th Street	773-924-9713	2
Deborah Lee	7853 S. Essex	773-978-4766	2
Sheila Doss	64 E. 48 th Street	773-924-9713	4
Orinthia Davenport	7401 S. Muskegon	773-544-5440	1
Deanine Marshall	2930 S. Dearborn	312-225-9614	3
Latrese Marshall	7403 S. Michigan	773-443-0760	1
Rosa Lee Tucker	802 E. 41 st Street	773-924-2455	2
Sharnetta Selvie	852 W. 50 th Place	773-268-4326	2

Received by Occupancy

Date

LCO Signature

Date

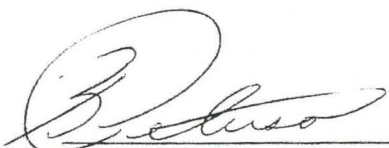
michele Davis 312 674-4167

Memo

To: CHA Occupancy Department
From: Izora Davis, Lakefront Community Organization
Re: Eligible Relocatee Files
Date: 7/30/01

Please find below a list of eligible Lakefront Relocatees and their attached files. If there are any questions and/or concerns, please feel free to contact me at (312) 674-4189 or (312) 674-4166.

Name	Address	Phone	Number in household
Stevie Browner	10206 S. St. Lawrence	773-995-9662	1
Latoya King	8235 S. Drexel	773-846-6383	1
Falicia Agbalaya	6001 W. 70 th Street	773-874-2401	3
Nicole Shearer	4512 S. Calumet #202	773-624-2358	1
Lakisha Wilson	8340 S. Manistee #2	773-978-6313	1



CHA Signature

7-30-01

Date



LCO Signature

7-30-2001

Date

Name	Address	Date Submitted
Mary Montgomery	8319 S. Commercial	6/13/01
Natiya Keaton	4219 S. Ellis	6/13/01
Virginia Jones	8440 S. Muskegon	6/13/01
Alice Keaton	4219 S. Lake Park	6/13/01
Denise Pollard	4009 S. Ellis #111	6/13/01
Latifat Agbalaya	5422 S. Calumet	6/13/01
Andrea White	64 E. 48 th Street	6/13/01
Deborah Lee	7853 S. Essex	6/13/01
Sheila Doss	64 E. 48 th Street	6/13/01
Orinthia Davenport	7401 S. Muskegon	6/13/01
Deanine Marshall	2930 S. Dearborn	6/13/01
Latrese Marshall	7403 S. Michigan	6/13/01
Rosa Lee Tucker	802 E. 41 st Street	6/13/01
Sharnetta Selvie	852 W. 50 th Place	6/13/01
Angela Parsons	6517 S. Ellis	1/5/01
Dashaun Anderson	520 E. 38 th Street	1/5/01
Juanithia Lee	6617 S. Green	1/5/01
Stevie Browner	10206 S. St. Lawrence	7/30/01
Latoya King	8235 S. Drexel	7/30/01
Falicia Agbalaya	6001 W. 70 th Street	7/30/01
Nicole Shearer	4512 S. Calumet #202	7/30/01
Lakisha Wilson	8340 S. Manistee #2	7/30/01
Pierre Miller	8248 S. Ashland #2E	2/9/01
Jesse Treadwell	4120 S. Prairie #606	2/9/01
Antoinette Montgomery	5019 S. St. Lawrence	2/9/01
Nakia Washington	16434 S. Turner	2/9/01
Kristy Boulware	1907 E. 78 th Street	8/99

Memo

I respond

To: Denise Richards, Occupancy Department
 From: Izora Davis, Lakefront Community Organization
 Re: Eligible Relocatee Files
 Date:

Please find below a list of eligible Lakefront Relocatees and their attached files. If there are any questions and/or concerns, please feel free to contact me at (312) 674-4189 or (312) 674-4166.

Name	Address	Phone	Number in household
Pierre Miller	8248 S. Ashland #2E	773-873-5810	4
Jesse Treadwell	4120 S. Prairie #606	773-268-4112	4
Antoinette Montgomery	5019 S. St. Lawrence 1 st Floor	773-924-0211	4
Renee Taylor	3983 S. Lake Park #304	773-536-7092	2
Nakia Washington	16434 S. Turner	708-210-0931	2

CHA Signature

Date

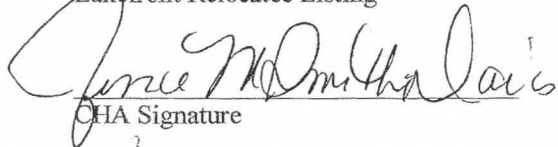
Izora Davis
 LCO Signature

1-2001
 Date

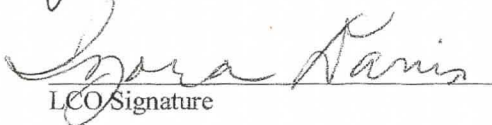
*these people' are have been placed in housing
 will verify this
 Izora Davis*

Name	Address	Phone	Number in household
Angela Parsons	6517 S. Ellis	773-752-1963	5
Yatkisha King	809 W. Monroe	312-491-2043	6
Latrice Johnican	7934 S. Sangamon	773-846-2069	2
Dashaun Anderson	520 E. 38 th Street		9
Juanithia Lee	6617 S. Green #2 nd Floor	773-783-4694	4
Tomika Truss	921 N. Mohawk #1278	773-955-7102	5

Lakefront Relocatee Listing


CHA Signature

1/5/2002 2:10 pm
Date


LCO Signature

1-5-2001
Date

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOROTHY GAUTREAUX, et al.,

Plaintiffs,

v.

CHICAGO HOUSING AUTHORITY,

Defendant.

)
)
)
)
) 66 C 1459
)
) Hon. Marvin E. Aspen
)
)

ORDER

This matter coming to be heard on the Motion of Plaintiffs to Show Cause why Defendant Chicago Housing Authority should not promptly tenant vacant scattered site housing units in the North Kenwood-Oakland neighborhood, and the Court having received presentations from both parties, IT IS HEREBY ORDERED:

- A. Eligible displaced Lakefront families shall continue to have first priority for all of the 441 new units that have been or will be built as Lakefront Replacement Housing, in accordance with this Court's June 3, 1996 Order.
- B. CHA shall review all information submitted by the Lakefront Community Organization (LCO) in an effort to identify eligible, displaced Lakefront families to fill all existing vacant scattered-site units in North Kenwood-Oakland and the additional units expected to be transferred to CHA by the end of July 2001. To the extent that CHA does not have sufficient applications from eligible, displaced Lakefront families by July 23, 2001 to fill all of those units, then any remaining



vacant units shall promptly be filled in accordance with the Tenant Assignment Plan for scattered site housing.

- C. The Tenant Assignment Plan previously approved by this Court requires that 50% of new scattered-site units be allocated to eligible community residents, 25% allocated to CHA residents on the CHA Transfer List, and 25% allocated to families on the CHA Waiting List. The Tenant Assignment Plan shall be amended to permit CHA to assign North Kenwood-Oakland Transfer List and Waiting List units on a first priority basis to relocatees from other CHA developments.
- D. No later than September 15, 2001, the CHA shall complete a plan for finally identifying the universe of eligible, displaced Lakefront families, complete with a bar date which will cut off all future claims to replacement housing by displaced Lakefront families, and thereafter CHA shall implement this plan. The bar date shall be set no later than December 31, 2001. Notwithstanding the bar date, any eligible, displaced Lakefront resident who attains his or her majority and first becomes eligible for public housing after December 31, 2001 and who submits an application for Lakefront Replacement Housing within 60 days of becoming eligible for public housing, shall be treated as if he or she had applied before the bar date, provided such resident was a household member on the lease at the time of displacement and is identified among the universe of eligible, displaced Lakefront families by the bar date. Once all of the identified, eligible, displaced Lakefront families have been housed, the priority found in Paragraph A above shall no longer apply.

- E. Occupants shall not be selected for future Lakefront Replacement Housing units beyond those identified in Paragraph B until the outreach program described in Paragraph D has been completed and the bar date has passed. Eligible, displaced Lakefront families identified through the outreach process discussed in Paragraph D shall have first priority to occupy all future Lakefront Replacement Housing units beyond those identified in Paragraph B. Any unit for which no eligible, displaced Lakefront family can be identified shall be filled in accordance with the revised Tenant Assignment Plan.
- F. In the future, the Receiver shall continue to provide regular notices to both CHA and the LCO of the estimated dates for transferring new or rehabilitated Lakefront Replacement Housing units to the CHA. No later than 210 days before the estimated transfer date of a new unit, CHA shall request applications from eligible, displaced Lakefront families identified through the outreach process described in Paragraph D. No later than 180 days before the estimated transfer date of each new or rehabilitated Lakefront Replacement Housing Unit, CHA shall commence reviewing the files of at least three prospective tenants for compliance with any applicable occupancy or eligibility requirements established by the CHA, a private developer, or a private manager. No later than 60 days before the estimated transfer date for each unit, CHA shall determine the unit's occupant.

Enter

Date

M. A. S. I. n

7/20/01