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JUDGE MARVIN E. ASPEN
UNITED STATES DISTRICT COURT

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Defendant.

66 C 1459
Hon. Marvin E. Aspen

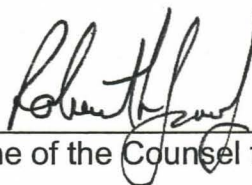
The Gautreaux Plaintiffs, by their undersigned counsel, object to the latest intervention motion of the Lakefront Community Organization (LCO). Rather than participate in the Lakefront and Drexel Working Group process, LCO has chosen once again to bring its concerns before this Court. The Receiver and the Chicago Housing Authority (CHA) explain in detail in their responses filed today why LCO's motion fails the legal test for intervention. Plaintiffs will not repeat those arguments. Plaintiffs emphasize in particular, however, that this latest intervention motion should be denied because it is a rehash of prior intervention motions denied by this Court and is predicated on reckless and unsupported factual assertions that contradict the evidentiary record in this case.

The heart of LCO's Complaint (§20) is an allegation of five breaches of the 1995 Revised Agreement between CHA and LCO. Three of those alleged breaches (§§ 20(a), 20(c) & 20(d)) deal directly with the development of non-elderly public housing. This Court ruled in its May 6, 1999 Order that the Revised Agreement is unenforceable with respect to such development issues, since those matters are within the scope of the Receivership.

Even if other aspects of the 1995 Revised Agreement were enforceable by this Court (which LCO has not attempted to demonstrate and Plaintiffs do not concede), the Complaint's remaining two allegations are based on unsupported factual assertions that are flatly contradicted by the evidentiary record in this case: that CHA has not given priority for Kenwood-Oakland units to LCO relocatees (Complaint, §20(b)) and that CHA has not conducted an aggressive outreach program to relocatees (§20(e)). The attached Affidavit of Lillian Fuentes, filed with this Court on June 29, 2001 as part of Defendant CHA's Response to Plaintiffs' Motion To Show Cause, demonstrated that CHA has in fact afforded such priority and conducted such outreach to relocatees. That affidavit is uncontested. LCO made no attempt to challenge it last summer and does not even acknowledge its existence in its current motion to intervene. It would be inappropriate to allow LCO to intervene in this case now, six months later, solely on the basis of unsupported assertions that contradict the Fuentes affidavit.

For the foregoing reasons, the Gautreaux Plaintiffs request that the LCO intervention motion be denied.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Robert L. Jones, Jr.", written over a horizontal line.

One of the Counsel for Gautreaux Plaintiffs

January 3, 2002

Alexander Polikoff
Robert L. Jones, Jr.
Business and Professional People
For the Public Interest
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Chicago, Illinois 60602
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AFFIDAVIT OF LILLIAN FUENTES

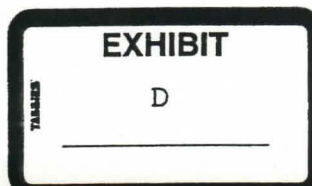
Lillian Fuentes, being first duly sworn on oath, states as follows:

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



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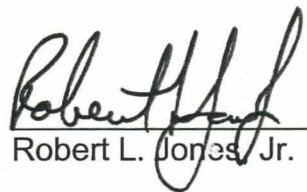
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CERTIFICATE OF SERVICE

I, Robert L. Jones, Jr., an attorney, certify that on January 3, 2002, I caused copies of Gautreaux Plaintiffs' Response To Motion Of Lakefront Community Organization (LCO) To Intervene to be served upon the persons whose names appear on the attached service list in the manner stated therein.


Robert L. Jones, Jr.

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