

2. JC is a 19 year old gay male of Haitian, Dominican, and Syrian descent who has been diagnosed with, and receives treatment for, Attention Deficit Disorder and bipolar disorder. He is in a committed same-sex domestic partnership with another adult, JR.

3. JR is a 22-year old Latino gay male who has been diagnosed with, and receives treatment for Attention Deficit Disorder, oppositional defiant disorder, and bipolar disorder. He is in a committed same-sex domestic partnership with another adult, JC.

4. JC and JR have been shuffled through three different shelters in less than a year as a result of discriminatory violence, threats of violence, harassment and public humiliation at the hands of respondents due to their sexual orientation. Both have been attacked by a resident wielding a knife, repeatedly humiliated in public by shelter staff, sexually harassed by shelter staff, and treated with outright contempt by staff, security guards, and DHS police. Additionally, JC has been punched by a stranger due to a shelter's unwillingness to unlock the door for him

5. Despite repeated, explicit, contemporaneous complaints, Respondents have failed to take any corrective action.

6. DHS, Aladdin Hotel, Millenium Care and LIFE Family Residence have also fostered an atmosphere which allows Complainants to be targeted for hostile treatment by shelter staff and other shelter residents because of their sexual orientation, their disabilities, their age and their race. Respondents have knowingly or negligently encouraged a homeless 19 year old and a homeless 22 year old to bounce around from shelter to shelter without making reasonable accommodation for their disabilities, or appropriately handling the obstacles they face as young gay men of color.

PARTIES

7. Complainant JCJC is a 19 year old gay male of mixed race who currently resides in LIFE Family Residence at 78 Catherine Street, New York, NY, 10038 with his domestic partner, JRJR.

8. Complainant JRJR is a 22 year old gay Latino male who currently resides in LIFE Family Residence at 78 Catherine Street, New York, NY, 10038 with his domestic partner, JCJC.

9. Respondent New York City Department of Homeless Services (NYC DHS) is the city agency responsible for the oversight and administration of the shelter system for homeless New Yorkers, including the Aladdin Hotel, Millenium Care, and the LIFE Family Residence. Additionally, DHS is the agency responsible for the oversight of Department of Homeless Services Police (DHS Police) who are present in many, if not all, shelters in the city. DHS also operates the Adult Family Intake Center which process homeless families without minor children for temporary shelter placement.

10. DHS promulgates the regulations and policies which govern the shelters, operates a department to accept and investigate complaints against shelters, and has authority over these shelters.

11. The primary place of business and for service on Respondent DHS is 33 Beaver Street, 17th Floor – Legal Dept., New York, NY 10004.

12. There has been no Commissioner of the NYC Department of Homeless Services appointed since the resignation of Gilbert Taylor at the end of 2015, but Steven Banks is acting as Administrator of this department in his capacity as Commissioner of the New York City Human Resources Administration. Service for Mr. Banks in his role as Acting Administrator of DHS is also accepted at 33 Beaver Street, 17th Floor – Legal Dept., New York, NY 10004.

13. Respondent Aladdin Hotel is an adult family shelter in Manhattan with its primary place of business at 317 W. 45th Street, New York, NY 10036. Aladdin Hotel is a housing accommodation as defined by §8-102 of the Administrative Code of the City of New York and is overseen by the NYC DHS.

14. Respondent Millenium Care operates an adult family homeless shelter located at 980 Prospect Ave., Bronx, NY 10459 and is a housing accommodation as defined by §8-102 of the Administrative Code of the City of New York. Respondent Millenium Care's primary place of business of process is 980 Prospect Avenue, Bronx, NY 10459 and the shelter is overseen by the NYC DHS.

15. Respondent Millenium Care Inc. employs a Shelter Director known to Complainants as Ms. Carmacho.

16. Respondent Millenium Care employs a security guard known only to the Complainants as "Rodney."

17. Respondent Millenium Care a case manager at the shelter known to Complainants as Ms. McFarling.

18. Respondent LIFE Family Residence operates the adult family homeless shelter located at 78 Catherine Street, New York, NY 10038, which is a housing accommodation as defined by §8-102 of the Administrative Code of the City of New York. Respondent LIFE Family Residence's primary place of business is 78 Catherine Street, New York, NY 10038 and they are also overseen by NYC DHS.

19. Respondent LIFE Family Residence employs Mr. John LaLanne as Shelter Director.

20. Respondent LIFE Family Residence utilizes the service of several members of the

DHS Police force.

21. Respondent LIFE Family Residence employs Amber Miller as a case manager; Ms. Miller was the case manager initially assigned to JC and JR, but she has had no extensive interaction with either of them, to their knowledge.

22. Respondent LIFE Family Residence also employs a case manager known to Complainants as Ms. Darisol and known to shelter residents as Ms. D. Ms. Darisol has had multiple interactions with both JC and JR in her role as case manager.

23. Respondent Life Family Residence employs a maintenance worker known as Erik to Complainants, and who has interacted with Complainants as part of his employment.

FACTS

Background

24. JCJC and JRJR are a mixed-race, young, gay male couple in the adult family shelter system. Furthermore, both have diagnoses of bipolar disorder and attention deficit disorders which are known or should be known to staff at each shelter.

25. On or about April 28, 2015 JC and his partner JR were forced into the shelter system after lack of space and anti-gay hostility made it impossible to stay with relatives any longer.

Aladdin Hotel Shelter

26. After applying for shelter through the Adult Family Intake Center, JC and JR were sent to the Aladdin Hotel in Manhattan which operates as a homeless shelter for adult families during the middle of May, 2015.

27. While in Aladdin Hotel, JR was chased and assaulted by another resident of the shelter who wielded a knife. The resident threatened to “gut” JR because he was a “fag” and then

also assaulted JC. This took place on or about August 28, 2015.

28. As a result of the attack, or about August 29, 2015, JC and JR were transferred to another adult family shelter, Millenium Care, which is located in the Bronx.

29. On information and belief, and based on representations made by a shelter worker at the time, the assailant was allowed to remain at the Aladdin Shelter.

Millenium Care Inc. Shelter

30. Upon arrival at the Millenium Care Shelter, the couple was placed in room 413 and remained there for their entire stay at Millenium Care. Room 413, at approximately ten feet square, is substantially smaller than most rooms Millenium Care assigns to couples after their initial intake.

31. Millenium Care is designed as a shelter for “adult families” and does not house anyone under the age of 18.

32. As far as they were aware, JC and JR were the only gay male couple housed in the Millenium Care shelter. They were also among the youngest of the shelter residents. The vast majority of families were heterosexual couples, with some pairings of adult siblings, or parents with adult children.

33. Shelter staff at Millenium Care treated JC and JR differently from other resident families. Guards, case workers and other staff, particularly a security guard known to Complainants as Rodney, were often rude to JC and JR, while they were more patient with other families and even joked and laughed with other residents.

34. For example, in order to enter or exit the shelter premises, all residents of Millenium Care shelter are required to sign in and out on a log sheet. Residents are also required to sign into a “bed sheet” in order to reserve their bed for the night. The “bed sheet” is only

circulated from 8pm to 10pm and residents who don't sign the bed sheet during this short window can be discharged from the shelter system, forcing them to re-apply for shelter.

35. At Millenium, both sign in sheets are in the custody of security guards: the log sheet is always at the security desk at the front door, while the "bed sheet" is held by a security guard who sometimes walks around the building.

36. Rodney was one of the security guards who monitored the sign-in process for both the entrance log sheet and the "bed sheet".

37. From the time that JC and JR moved into the shelter through November of 2015, security guard Rodney treated JC and JR with hostility and contempt whenever they signed in and out of the shelter and further when they tried to sign the "bed sheet" to reserve their bed for the night. Rodney's actions jeopardized the couple's access to a shelter bed and the shelter system generally

38. On or about November 16, 2015, JR approached Rodney to sign the bed sheet to ensure they had a bed for the night and Rodney snapped that "he was f***ing tired of people coming up to him trying to sign the (bed) sheet" and walked away with the log. Conversely, when two women approached him to do the exact same thing, only moments before, he allowed them to sign the sheet without protest. Thus, Rodney did not appear to have a problem allowing everyone to sign in – as required by the shelter to reserve space for the night – only JR and JC.

39. Similarly, on or about November 16, 2015, Rodney knocked on the door of room 413 in order to get signatures on the "bed sheet." JR responded that he needed a minute to open the door. Rodney then yelled loudly through the door, "Now you're going to have to "f***ing wait!" and walked away.

40. On or about January 22, 2016, a Millenium Care caseworker known to

Complainants as Ms. McFarling and a female security guard were conducting routine room inspection and knocked on the door of room 413 at approximately 11 am in the morning.

41. After hearing the knock, JR replied that they needed a few minutes to get dressed, as the medication that they each take for bipolar disorder creates drowsiness in the mornings. The caseworker replied that they did not have the time to wait and wiggled the key in the lock as the security guard asked in a loud voice, “Are you doing the nasty?” Her voice could be heard down the hall by other residents.

42. Ms. McFarling and the guard had no reason to assume that the two were engaged in sexual conduct. Rather, they simply assumed that the two must be having sex because they were gay men. Room inspections for heterosexual couples appear to be carried out with more respect for the residents and neither JC nor JR have ever heard the staff make reference to any other couple’s sexual activities.

43. On or about January 23, 2016, at approximately 4pm, JC and JR were attempting to sign the log sheet, as required. They used the first pen they could find, which wrote in green ink. Inexplicably, this angered Rodney, the security guard, who berated the two saying, “Y’all are grown ass men – what is wrong with you?” and asking “Do you know where you are at or who you are?” He then stated, “it’s always something with y’all niggers.”

44. In response to Rodney’s remarks, one of the two re-signed the sheet in black pen and then asked that the security guard treat them with more respect. The security guard, Rodney, then lunged as though he were going to come out from behind the desk. Both JC and JR felt threatened and were afraid they would be attacked.

45. This incident caused JC and JR to feel unsafe around Rodney, particularly as they understood his comment about “knowing who you are” to refer to their identification as gay men,

and did not see Rodney treating other heterosexual residents with the same hostility.

46. Shortly after, the couple spoke to the shelter director, Ms. Camacho, about the situation, explaining that they felt unsafe. She stated that she would look into the issue, but nothing appeared to happen.

47. Since arriving at the shelter, JC and JR were also treated with hostility by Ms. Camacho, the shelter director.

48. Although many couples in the shelter responded to the stress of homelessness by arguing with each other in public spaces, Ms. Carmacho routinely intruded into the private disagreements between JR and JC and threatened them with discharge for arguing with each other. On several occasions, up to five staff people joined in on these discussions. On information and belief, this intervention did not happen with older, heterosexual couples, despite the fact that homeless heterosexual couples were frequently found arguing at the shelter, and some even got into physical fights with each other.

49. In contrast to the hostility Ms. Carmacho showed JC and JR, Ms. Camacho could be seen laughing and joking with other residents, something she never did with JC or JR.

50. In addition, JC and JR were assigned to one of the smallest rooms in the Millenium Care shelter; their room was approximately 10 square feet. They were told by other residents that, prior to their arrival, their room had served primarily as a temporary space for new residents undergoing eligibility evaluations and had not generally been assigned as the primary shelter residence for a couple.

51. JC and JR requested a transfer to a larger room on numerous occasions, supporting their requests with letters from their psychiatrists who explained that they were in dire need of more space for mental health reasons.

52. Despite the fact that other, newer residents were moved into larger rooms after their initial evaluations, JC and JR were consistently denied their requests to transfer from their small room.

53. In fact, the larger room next door became vacant while the couple was staying at Millenium Care. JC asked if it were possible to move into this larger room and was told that this room was reserved for people with hearing disabilities. However, shortly thereafter, a heterosexual couple with no hearing impairment was moved into that room instead.

54. The shelter director's refusal to transfer the two to a larger room not only made JC and JR feel humiliated, but their small living space exacerbated their stress and made their mental health disabilities harder to manage.

55. On or about January 30, 2016, JC was in front of the shelter when a heavysset man started threatening him from across the street, calling him "faggot" and saying he would "get him and his boyfriend too." He then started approaching JC from across the street with a large pit bull dog and a chain in his hand.

56. As the man started across the street toward JC, JC started frantically ringing the shelter's front door bell, banging on the door and yelling to be let in.

57. Multiple staff members, clearly visible through the door, simply watched as the 19 year old, 120 lb. JC banged the door and rang the bell, begging to be let in, while a much larger, angry man screamed homophobic slurs and threatened him with a pit bull and a chain.

58. The man ultimately punched JC in the face, in view of shelter staff.

59. After the attack, JR asked the security guard and other residents why they didn't open the door to let his partner in. The Shelter Director, Ms. Carmacho, said that JC was not allowed into the building despite the impending threat of attack because "it was policy." She

failed to explain fully why a shelter – charged with protecting the most vulnerable members of the population – could not admit one of its own residents when that resident was being threatened with physical violence and there was time to let them in before they were assaulted.

60. Notably, the Millenium Shelter is set up with a contained internal vestibule immediately between two sets of doors: the front door of the shelter and the interior door to the living space. Both doors are equipped with electronic locks such that someone could easily be buzzed into the vestibule without allowing the person to subsequently enter the living space, providing at least temporary relief from physical assault. Thus, shelter staff could have shown compassion and allowed JC through the first lock, without allowing him to enter the shelter, in order to prevent him from a vicious homophobic attack.

61. After the attack, the case worker, Ms. McFarling, and Shelter Director Ms. Camacho told the couple that that they would be given a transfer to another shelter for their safety.

62. After hearing no news about the transfer for a week thereafter, the two were informed on the morning of February 8, 2016 that they would have to pack their things to be moved to another shelter that day.

63. Neither JC nor JR were given 48 hours written notice of the reason for the transfer, as required by DHS regulations, nor were they granted a pre-transfer conference, as further required by DHS regulations.

LIFE Family Residence on Catherine Street

64. JC and JR were transported by van to a different shelter at 78 Catherine Street in Manhattan at approximately 3pm on February 8, 2016.

65. Immediately upon arrival, JC and JR were told to remove their coats, hats and

gloves to pass through the metal detector.

66. Shortly thereafter, approximately 6 security guards began to sort through all of their belongings. The security guards were laughing and making fun of certain of their belongings, and began to set aside items that they claimed required confiscation, including spoons, forks, a small folding stool, a plant in a glass vase, hair products in a can, electric hair clippers, and intimate toys.

67. In the presence of numerous onlookers, one or more guards visibly pointed at one of the intimate toys and said in a loud voice “You aren’t allowed to have *this!*”

68. Nothing in the written shelter guidelines given to Complainants or in DHS policies, upon information and belief, prohibits shelter residents from possessing intimate toys. Upon information and belief, heterosexual couples and were not put through this public humiliation.

69. At this time, other residents and new arrivals were standing around watching the process.

70. One of the security guards then said that they would have to check all of the couple’s DVDs for pornography. Again, upon information and belief and based on the written policy Complainants were given, nothing in DHS or shelter regulations prohibits shelter residents from possessing pornography, nor requires security staff to watch any and all DVDs a resident may have.

71. JC and JR, having only just been moved to this shelter, felt publicly humiliated and demoralized. They had been shamed in front of the other shelter residents, with whom they were now forced to live. Moreover, they were once again put in a situation in which the security guards at a shelter – those charged with ensuring their own safety from outsiders and residents

alike – were clearly treating them as less than human and making them ripe targets for humiliation.

72. JC and JR were then assigned an extremely unkempt room. In order to make the room livable, they were forced to clean a frozen blood-like sludge from their freezer, to scrub a brown sticky substance from their refrigerator, to mop the walls, and to clean the floors. The two were unable to ameliorate some of the worst conditions, including a line of sticky mouse traps that had been inexplicably adhered to the bottom of the door to their room.

73. While cleaning their room, JC and JR were visited by a maintenance worker, Erik, who invited himself into their room and asked if they were “freaks.”

74. JC and JR felt uneasy and did not know what to make of this behavior, but became more alarmed when Erik the maintenance worker told them that they owed him a “lap dance.” The two became extremely uncomfortable and unsettled in their room after this interaction and were concerned that they might become targets for further harassment due to their sexual orientation and their youth.

75. On or about February 13, 2016, the couple were in the shelter lobby arguing about headphones.

76. A DHS police officer approached the couple and threatened to arrest them. The officer then grabbed JC by the arm.

77. JC, who is 120 lbs. and approximately 5’4”’, ran toward the cafeteria, afraid of what the DHS officer would do. As he departed, the heavyset DHS police officer pursued him, tackled him, landed on top of him, placed a knee in his back and cuffed his hands behind his back. Meanwhile, another DHS officer was threatening JC with a taser.

78. JC began to cry, and was dragged to the security office where he was handcuffed

to a bench.

79. DHS officers demanded his name and information and, when the crying, anxious teenager did not immediately provide these details, the officers threatened him again with a taser.

80. Because JC was anxious and crying, DHS officers claimed he was having some kind of mental breakdown. They then called an ambulance to take JC away.

81. JC asked to see his partner before the ambulance came, but the DHS police officers refused to allow JC to see his partner before he was dragged off and, moreover, JR was not even allowed to ride in the ambulance.

82. When JC was released from the hospital, he had an air cast as a result of the incident with the DHS officers. He was told to wear it for three to four weeks.

83. Unfortunately, when JC returned, the discriminatory hostility of the staff did not lessen. For example, JC and JR were repeatedly harassed by the maintenance man who continuously asked if they were into threesomes and if they were “freaky.” The maintenance worker refers to himself as JR and JC’s “pimp,” saying things like “respect your pimp!” This makes the couple extremely afraid, uncomfortable and uneasy about their safety.

84. JR has contemporaneously reported each of the incidents described above directly to shelter staff. He has also reported the discriminatorily hostile treatment via phone to Yvonne Ballard, on information and belief a representative of the Ombudsman’s office, on or about September 1, 2015. He further reported inappropriate behavior at LIFE Family Residence to someone known only to them as Gabriel, also at the Ombudsman’s office on information and belief, on or about February 8, 2016.

JURISDICTION

85. The New York City Human Rights Commission has jurisdiction over this action pursuant to its general jurisdiction under NYC Code § 8-105.

86. Venue is proper pursuant to New York Civil Practice Laws and Rules § 503 because Complainants are domiciled in New York City, Respondents are all located in or employed in New York City, and all actions relevant to this proceeding occurred in New York City.

RELEVANT LAW

New York City Human Rights Law

87. The New York City Council enacted the New York City Human Rights Law in an explicit effort to prohibit intolerance, discrimination, hostility or violence against individuals based on their actual or perceived inclusion in a category of people who had historically suffered oppression, exclusion, and/or prejudice for their differences. The law expressly includes sexual orientation, disability, age and race among the protected classes.

88. “Housing Accommodation” is defined as “any building, structure, or portion thereof which is used or occupied or is intended, arranged or designed to be used or occupied, as the home, residence or sleeping place of one or more human beings.” NYC Code § 8-102(10) Aladdin Hotel, Millenium Care and LIFE Family Residence all fall under this definition, and DHS has ultimate responsibility for the oversight of all three housing accommodations.

89. “Public Accommodation” is defined broadly to include “providers, whether licensed or unlicensed, of goods, services, facilities, accommodations, advantages or privileges of any kind, and places, whether licensed or unlicensed, where goods, services, facilities, accommodations, advantages or privileges of any kind are extended, offered, sold or otherwise

made available” NYC Code § 8-102(9). Aladdin Hotel, Millenium Care and LIFE Family Residence all fall under the definition of public accommodation and DHS has oversight over all three public accommodations.

90. Under the city code, “sexual orientation means heterosexuality, homosexuality, or bisexuality.” NYC Code § 8-102 (20).

91. Under the city code, “disability” includes “any physical, medical, mental or psychological impairment, or a history or record of such impairment.” NYC Code § 8-102(16)

92. Nothing in the city code limits the term “age” or “race” in such a way as to exclude JC or JR from protection.

93. The city code defines “reasonable accommodation” as “such accommodation that can be made that shall not cause undue hardship in the conduct of the covered entity’s business.” The code places the burden of proving undue hardship on the Respondent. NYC Code § 8-102 (18).

94. The code explicitly prohibits discrimination in the “terms, conditions or privileges” of a housing accommodation on the basis of actual or perceived “race, creed, color, national origin, gender, age, disability, [or] sexual orientation, ...” NYC Code § 8-107 (5)(a)

95. The code also makes it unlawful “to refuse, withhold from or deny to such person any of the accommodations, advantages, facilities or privileges” of a public accommodation on the basis of “actual or perceived race, creed, color, national origin, gender, age, disability, [or] sexual orientation,....” And expressly extends liability for discrimination to an “owner, lessee, proprietor, manager, superintendent, agent or employee of any place or provider of public accommodation.” NYC Code§ 8-107 (4).

96. The code makes it unlawful when “a person interferes by threats, intimidation or

coercion or attempts to interfere ... with the exercise and enjoyment by any person of rights...” and provides for civil penalties if this section is violated. NYC Code § 8-602.

97. Further, the code includes as unlawful discrimination those acts or attempts that aid, abet, incite, compel or coerce forbidden behavior. NYC Code § 8-107(6).

98. The New York City Human Rights Law was intended to be construed liberally and explicitly states this intent in Section § 8-130.

Hostile Housing Environment Discrimination

99. In 2005, the City Council passed Local Law No. 85 in order to clarify the broad purposes of the New York City Human Rights Law. In the preface, the Council wrote:

It is the sense of the Council that New York City’s Human Rights Law has been construed too narrowly to ensure protection of the civil rights of all persons covered by the law. In particular, through passage of this local law, the Council seeks to underscore that the provisions of New York City’s Human Rights Law are to be construed independently from similar or identical provisions of New York state or federal statutes. Interpretations of New York state or federal statutes with similar wording may be used to aid in interpretation of New York City Human Rights Law, viewing similarly worded provisions of federal and state civil rights laws as a floor below which the City’s Human Rights law cannot fall, rather than a ceiling above which the local law cannot rise.

Local Law No. 85 (2005) of the City of New York.

100. The code thus looks to interpretation of federal and state discrimination statutes as the baseline of protection and aims to have broader reach than any of the similar laws currently impacting New York City.

101. The Second Circuit, among others, currently recognizes a claim of hostile housing environment discrimination. *Huntington Branch, NAACP v. Town of Huntington*, 844 F.2d 926, 934 (2d. Cir. 1988). The Southern District of NY has affirmed this view and applied the elements of hostile workplace discrimination analysis to the housing context. *People of State of*

N.Y. by Abrams v. Merlino, 694 F. Supp.1101, 1104-1105 (SDNY 1988).

102. Similarly, the New York state courts have found hostile housing environments in the residential housing context. *State Division of Human Rights v. Stoute*, 36 A.D.3d 257(2006, 2nd Dept.).

103. Given the explicitly broad anti-discriminatory purpose enshrined in the language of the New York City Human Rights Law itself, and clarified by Local Law No. 85, it would follow that this statute must also prohibit acts that create a hostile housing environment.

SUMMARY AND REMEDIES

104. JCJC and JRJR have suffered violent physical attacks and emotional distress as a result of his ongoing discriminatory abuse in the shelter system.

105. Millenium Care and LIFE Family Residence have employed staff and promoted policies which intentionally or negligently encouraged the discriminatory abuse.

106. Aladdin Hotel has, on information and belief, allowed a dangerous resident to remain in the shelter while transferring Complainants. While the decision to move JC and JR may have been reasonable and based in safety concerns, the choice to allow a known homophobic assailant to remain in the shelter system is not reasonable.

107. DHS has knowingly or negligently allowed the shelters and staff under its oversight to discriminate against JC and JR on the basis of their sexual orientation, their disability, their age and their race.

108. For all of the reasons articulated in the fact section of this complaint, Complainants charge that Respondents have discriminated against them in the terms, conditions, and privileges of a housing accommodation by subjecting them to a hostile environment based on their sexual orientation, disability, age, and race in violation of § 8-107(5) of the

Administrative Code of the City of New York, and have damaged them thereby.

109. For all of the reasons articulated in the fact section of this complaint, Complainants charge that Respondents have discriminatorily denied them the accommodations, advantages, facilities and privileges of a public accommodation by subjecting them to a hostile environment based on their sexual orientation, disability, age, and race in violation of § 8-107(5) of the Administrative Code of the City of New York, and have damaged them thereby.

110. Complainants have not previously filed any civil or administrative action on the basis of the facts within.

111. Complainants respectfully request that a judgment and order be issued:

- a) Declaring that the Respondents' discriminatory practices constitute unlawful discrimination and violate the New York City Human Rights Law, NYC Admin Code § 8-101 et. seq.;
- b) Requiring Respondents to cease and desist from such unlawful practice;
- c) Awarding compensatory damages pursuant to NYC Admin. Code § 8-120(8);
- d) Awarding civil penalties pursuant to NYC Admin. Code §8-126;
- e) Requiring all DHS staff, including members of the DHS police force to undergo anti-bias training;
- f) Requiring that all DHS staff, including members of the DHS police force to undergo training in de-escalation of conflict, with a particular emphasis on the special needs of residents with mental health diagnoses.
- g) Requiring that DHS develop a protocol for dealing with residents who present mental health diagnoses that does not rely on use of force and discipline as a first line of defense;
- h) Requiring that DHS develop a zero-tolerance policy for discriminatory behavior in the workplace;
- i) Granting Complainants an expedited Section 8, LINK or similar voucher so they can move into an apartment of their own, free from existing bias in the shelter system;
- j) Granting Complainants such other and further relief as the Commission deems appropriate.

DATED: Queens, New York
February 29, 2016

Respectfully Submitted,

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