

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

CRYSTAL CARTER and THE CONNECTICUT
FAIR HOUSING CENTER,

Plaintiffs,

Case No.: 3:12-cv-01108 (WWE)

V.

HOUSING AUTHORITY OF THE TOWN OF
WINCHESTER,

Defendant.

FIRST AMENDED COMPLAINT AND JURY DEMAND

PRELIMINARY STATEMENT

1. Plaintiffs Crystal Carter and the Connecticut Fair Housing Center (“CFHC”) bring this action for declaratory, injunctive, and monetary relief against Defendant Housing Authority of the Town of Winchester, also referred to as the Winchester Housing Authority (“WHA”), for systematically and unlawfully discriminating against African-Americans and Hispanics in the operation and administration of the WHA’s Section 8 housing choice voucher program.¹

2. The Section 8 program is the “federal government’s major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary

¹ The program is often described interchangeably as the “Housing Choice Voucher” and “Section 8” certificate program because the Section 8 voucher program was phased into the Housing Choice Voucher Program beginning in 1999, *see* HUD, Voucher Program Guidebook at 1-5 (Apr. 2001), *available at* http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv/forms/guidebook. This Complaint uses the terms interchangeably.

housing in the private market.”² Through the program, local housing authorities, like WHA, administer federally-funded rental subsidies that can be used by eligible families to rent housing in the private market. The program is extremely important because Section 8 vouchers afford hundreds of thousands of beneficiaries the opportunity to move to areas with low poverty levels, good schools, high-quality public services, and employment opportunities (“high opportunity areas”).

3. Public housing authorities, such as WHA, are prohibited from using “residency requirements” in allocating Section 8 vouchers. They cannot refuse to provide Section 8 vouchers to families simply because they are not residents of the City, town, or jurisdiction in which the public housing authority is situated. *See* 24 C.F.R. § 982.207(b)(1)(i) (“Residency requirements are prohibited.”); *see also id.* § 982.202(b)(1) (admission to Section 8 programs cannot be based on “where the family lives before admission to the program”). Public housing authorities are also prohibited from adopting discriminatory “residency preferences.” *See* 24 C.F.R. § 982.207(b)(1)(i) & (iii); *see also id.* § 5.105(a)(1).

4. These requirements are unlawful because in communities with populations that are disproportionately White and/or non-Hispanic they perpetuate segregation by excluding minority applicants who live outside those communities from obtaining housing there. Contrary to the mobility and free-choice housing goals of the Section 8 program, residency requirements and preferences prevent minority families from moving to high-opportunity areas, ensuring that overwhelmingly-White communities remain overwhelmingly-White.

5. Defendant is located in the city of Winsted, which is in the town of Winchester, in Litchfield County, Connecticut. The population of Winchester is overwhelmingly White, with

² HUD Website, Section 8 Fact Sheet, *available at* http://portal.hud.gov/hudportal/HUD?src=/topics/housing_choice_voucher_program_section_8.

very few African-Americans or Hispanics living there: according to the 2010 American Community Survey 5-year estimates, 94.5% of housing units in Winchester are occupied by White, non-Hispanic households, while only 4.5% are Hispanic.³ The number of housing units occupied by African-American households is so low it does not register above 0%.

6. Defendant is responsible for operating the Section 8 housing choice voucher program in Winchester and sixteen surrounding communities—a consortium WHA refers to as the “Rental Assistance Alliance.” A map depicting the Rental Assistance Alliance is included as Attachment 1.⁴ Like Winchester, the other towns in the Rental Assistance Alliance are overwhelmingly non-Hispanic White. In *all* of the Rental Assistance Alliance communities, the percentage of units occupied by White, non-Hispanics is greater than 91%.⁵

7. Ms. Carter is an African-American single mother and domestic violence survivor. In early 2011, she moved to Hartford, Connecticut hoping to provide a stable environment for her six children, one of whom is developmentally disabled. Forced to stay in various homeless shelters and other unstable environments throughout 2011, Ms. Carter diligently pursued housing for her family, contacting and applying to dozens of housing authorities and housing assistance programs throughout Connecticut.

8. During this period, Ms. Carter contacted Defendant WHA to request a Section 8 voucher application, hoping for a chance to move her family into a safer, higher opportunity area. Although WHA’s waiting list was open to applicants, WHA refused even to send Ms. Carter an application, telling her that she was not eligible because she did not live within the

³ ACS Demographic Characteristics for Occupied Housing Units, 2006-2010 ACS 5-Year Estimates, S2502, Town of Winchester, available at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>.

⁴ The Rental Assistance Alliance is depicted in green on the map. Attachment 1 also depicts three “comparator” regions, discussed below. *See infra* ¶¶ 66-75.

⁵ ACS Demographic Characteristics for Occupied Housing Units, 2006-2010 ACS 5-Year Estimates, S2502, for all towns in the Rental Assistance Alliance, available at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>.

Rental Assistance Alliance. WHA also told Ms. Carter that Winchester was not on a “bus line,” there were no jobs there, and it was in the “woods.” WHA recommended that Ms. Carter apply to the housing programs in Bridgeport, New Haven, or Torrington, all communities with considerably larger African-American and Hispanic populations than the towns in the Rental Assistance Alliance.

9. Devastated that she and her family were being denied the opportunity to move into stable housing, Ms. Carter sought help from a legal services provider, and was referred to CFHC. CFHC assisted Ms. Carter with counseling and her housing search, and it investigated WHA’s conduct and practices. CFHC’s investigation confirmed that WHA utilizes an illegal residency requirement, precluding applicants from outside the overwhelmingly majority-White Rental Assistance Alliance from even *applying* to its Section 8 program. CFHC’s investigation also appeared to confirm that WHA utilizes an illegal residency preference. WHA’s illegal policies and practices preclude a disproportionate number of income-eligible minority households from receiving housing vouchers, solely because they do not already live in a Rental Assistance Alliance town. WHA thereby ensures that the towns in the Alliance remain disproportionately White and non-Hispanic.

10. Through its illegal residency requirement, preference, and unlawful administration of the Section 8 program, WHA intentionally discriminates against African-Americans and Hispanics, ensuring that most minority individuals in Connecticut never even receive a chance to apply for Section 8 vouchers, let alone actually receive them and move to a community in the Rental Assistance Alliance. WHA’s actions also disparately harm African-Americans and Hispanics by perpetuating racial segregation in the overwhelmingly White Rental Assistance Alliance towns. WHA’s actions deny these individuals access to areas in the Rental

Assistance Alliance with low poverty levels, good schools, high-quality public services, and proximity to employment opportunities.

JURISDICTION AND VENUE

11. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, and 1343, 28 U.S.C. §§ 2201 and 2202, and 42 U.S.C. § 3613.

12. Venue is proper in the District of Connecticut under 28 U.S.C. § 1391(b), as the acts complained of occurred in the District of Connecticut and Defendant resides in the District of Connecticut.

THE PARTIES

13. Plaintiff Crystal Carter lives at 498 Cornwall Street, Hartford, Connecticut 06112.

14. Plaintiff CFHC is a non-profit organization dedicated to ensuring that all people have equal access to housing opportunities in Connecticut, regardless of race, national origin or other protected characteristics. CFHC's principal office is located at 221 Main Street, Hartford, Connecticut 06106.

15. CFHC undertakes various activities to further its mission, including investigating complaints of housing discrimination; offering advice and counseling about the fair housing laws; providing free legal representation to the victims of housing discrimination; conducting education workshops on fair housing issues; working closely with city and local governments and housing providers on fair housing issues; and educating all members of the housing provider community on their rights and responsibilities under the fair housing laws.

16. CFHC also investigates fair housing violations through its "testing" program. "Testers" are individuals who pose as renters or homebuyers for the purpose of obtaining information about the conduct of local housing authorities and governments, landlords, real

estate companies, agents, and others to determine whether illegal housing discrimination is taking place. Testing occurs under controlled conditions to target and isolate potentially unlawful conduct.

17. CFHC has expended and continues to expend scarce staff time and resources to investigate and counteract Defendant's discriminatory operation of its Section 8 program, which has diverted and continues to divert resources away from other activities that CFHC would otherwise pursue. Defendant's discriminatory practices have also frustrated and continue to frustrate CFHC's mission of ensuring that all people have equal access to housing opportunities in Connecticut by, among other things, making housing unavailable because of race, color, and national origin.

18. Defendant the Housing Authority of the Town of Winchester, also called the Winchester Housing Authority, is a public body corporate and politic that has the power to sue and be sued. *See* Conn. Gen. Stat. §§ 8-40, 8-44(a). Its principal offices are located at 80 Chestnut Street, in the City of Winsted, Connecticut 06098. All references to Defendant WHA include any individual acting on behalf of or under the authority derived from WHA.

STATEMENT OF FACTS

A. Overview of the Section 8 Housing Choice Voucher Program.

19. Congress established the Section 8 Existing Housing Program—also referred to as the Housing Choice Voucher program—as part of the Housing and Community Development Act of 1974, Pub. L. No. 93-383, Title II, § 201(a), 88 Stat. 653, 662-66, now codified at 42 U.S.C. § 1437f and Housing Community and Development Act of 1987, Pub. L. No. 100-242, § 143, 101 Stat. 1814, 1850 (1988), codified as amended at 42 U.S.C. § 1437f(o); *see also* 24 C.F.R. §§ 982.1 *et seq.*

20. Under the program, the United States Department of Housing and Urban Development (“HUD”) enters into annual contracts with local housing authorities, like WHA, to fund Section 8 vouchers. Housing assistance is then provided on behalf of a family or individual, and the participants are able to find their own housing in the private market, including single-family homes, townhouses, and apartments. Participants are not limited to units located in subsidized housing projects. With Section 8 assistance, renters pay between 30% and 40% of their incomes for rent, and federal funding pays the remaining amount of rent to landlords.

21. Local housing agencies operating Section 8 programs must administer their programs in accordance with rules prescribed by HUD. Low-income families and individuals may apply for Section 8 vouchers at any authorized Section 8 housing agency when its waiting list is open. Each Section 8 program must be open to all applicants, not just local residents.

22. The Section 8 voucher program enables beneficiaries to choose the type and location of housing that best fits their needs, allowing recipients to live in high-opportunity areas with low poverty levels, good schools, high-quality public services, and employment opportunities. Section 8 vouchers are also intended to further racial and national origin integration by enhancing mobility and free housing choice. These vouchers are extremely important, because they offer hundreds of thousands of beneficiaries the opportunity to move into areas from which they would otherwise be excluded.

23. In furtherance of those goals, public housing authorities, such as WHA, are prohibited from imposing “residency requirements” on applicants. *See* 24 C.F.R. § 982.207(b)(1)(i) (“Residency requirements are prohibited.”). Families may not be excluded from Section 8 programs simply because they do not already live in the town, community, or jurisdiction in which the housing authority is located. *Id.* § 982.202 (“Admission to the program

may not be based on where the family lives before admission to the program.”). Public housing authorities, such as WHA, are also prohibited from imposing “residency preferences” that are discriminatory or that have the purpose or the effect of denying admission to the program on the basis of race, color, or national origin. *See* 24 C.F.R. § 982.207(b)(1)(i) & (iii); *see also id.* § 5.105(a)(1).

24. Policies that facially favor residents of communities with populations that are overwhelmingly White and non-Hispanic “disproportionately favor Whites [and non-Hispanics] over minorities in the long run.” *Langlois v. Abington Hous. Auth.*, 234 F. Supp. 2d 33, 56 (D. Mass. 2002). For this reason, residency requirements and preferences imposed by housing authorities situated in communities that are overwhelmingly White and non-Hispanic discriminate against African Americans and Hispanics. The prohibition on residency requirements and discriminatory residency preferences addresses the problem of favoring Whites over minorities, ensuring that communities with disproportionately White, non-Hispanic populations cannot perpetuate segregation by excluding people of color from Section 8 programs and, therefore, from their communities.

25. At all relevant times, WHA and its agents and employees have been or should have been aware of the prohibition against imposing residency requirements and discriminatory residency preferences in the administration of Section 8 programs.

B. The Town of Winchester and the Other Towns in the Rental Assistance Alliance are Overwhelmingly non-Hispanic White.

26. The population of Winchester is disproportionately White, with very few African-Americans or Hispanics living there. According to the 2010 American Community Survey 5-year estimates, 94.5% of housing units in Winchester are occupied by White, non-Hispanic

households, while only 4.5% are Hispanic.⁶ The number of housing units occupied by African-American households is so low that it does not register above 0%.

27. By comparison, in Connecticut as a whole, only 77.2% of housing units are occupied by White, non-Hispanic households, while 9.8% are occupied by Hispanic households and 8.9% are occupied by African-American households.⁷

28. A comparison of renter-occupied housing units in Winchester compared to renter-occupied housing units in Connecticut as a whole reveals even greater disparities. In Winchester, 94.0% of renter units are occupied by White, non-Hispanic households, whereas in Connecticut as a whole, 56.5% of renter units are occupied by White, non-Hispanic households.⁸ Similarly, while only 5.4% of Winchester's renter units are occupied by Hispanic households and 0% by African-American households, in Connecticut as a whole, 20.7% renter units are occupied by Hispanic households and 17.1% by African-American households.

29. The sixteen other communities in the Rental Assistance Alliance are also overwhelmingly White and non-Hispanic, reflecting similarly extreme racial and national origin disparities as those present in Winchester. According to the 2010 5-year estimates, in *all* of the Rental Assistance Alliance communities, the percentage of units occupied by White, non-Hispanics is above 91%, compared to only 77.2% for Connecticut as a whole. Only one of the remaining sixteen communities has a population of units occupied by African-Americans above 1% (compared to 8.9% for Connecticut as a whole), and in thirteen of the communities, the

⁶ See S2502, Town of Winchester, *supra* note 3.

⁷ ACS Demographic Characteristics for Occupied Housing Units, 2006-2010 ACS 5-Year Estimates, S2502, State of Connecticut, available at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>.

⁸ Compare S2502, Town of Winchester, *supra* note 3, with S2502, State of Connecticut, *supra* note 7.

percentage of units occupied by African-Americans is too low to register above 0%.⁹ A table summarizing the extremely high populations of Whites and extremely low populations of African-American and Hispanics in the Rental Assistance Alliance is included as Attachment 2.

C. Plaintiff Crystal Carter's Efforts to Seek Housing Assistance From WHA.

30. Ms. Carter is an African-American single mother and domestic violence survivor. In early 2011, she moved from Florida to her hometown of Hartford, Connecticut hoping to provide a stable environment for her six children. One of her children, now five years old, is developmentally disabled. Throughout 2011, Ms. Carter and her family were forced to stay in various homeless shelters and other unstable environments. After staying in several shelters and living with family, the Connecticut Department of Children and Families relocated Ms. Carter and her children to a motel room with no kitchen.

31. During this period, Ms. Carter vigorously pursued housing for her family. She spent many hours researching, contacting, and applying to dozens of housing authorities and housing assistance programs throughout Connecticut. The Section 8 waiting lists for the vast majority of housing authorities were closed to all applicants because no vouchers were available and none were expected to become available in the foreseeable future.

32. In March 2011, Ms. Carter contacted the WHA to request a Section 8 voucher application, hoping for a chance to move her family into a stable, higher opportunity area. Unlike most other housing authorities, WHA's Section 8 waiting list was not closed; WHA was accepting applications for Section 8 vouchers.

33. Ms. Carter spoke with a WHA employee named Carol Henderson. Ms. Carter, who is identifiable by her voice as African-American, informed Ms. Henderson that she was a homeless mother with six children, and that she wanted to apply to the Section 8 program. Ms.

⁹ See S2502, for all towns in the Rental Assistance Alliance, *supra* note 5.

Henderson told Ms. Carter that WHA was not sending applications to people who did not reside in one of the seventeen towns in the Rental Assistance Alliance. Ms. Henderson also told Ms. Carter that Winchester was not on a “bus line,” that there were no jobs in Winchester, and that Winchester was “in the woods.” Ms. Henderson then told Ms. Carter that it would be better for her to apply to Section 8 programs in Bridgeport, New Haven, or Torrington, Connecticut.

34. The African-American and Hispanic populations in Bridgeport, New Haven, and Torrington are all significantly higher than in Winchester or any of the other communities in the Rental Assistance Alliance.¹⁰

35. Ms. Carter’s conversation with Ms. Henderson left her feeling confused, extremely frustrated, and even more desperate to find housing. Although the WHA waiting list was open, she was precluded entirely from even applying and having an opportunity to provide stable housing for her family.

36. Ms. Carter contacted HUD to inquire into whether WHA could legally deny her an application based on her residency. Ben Sanchez, a HUD representative, gave Ms. Carter a copy of 24 C.F.R. § 982.207, which prohibits all residency requirements and discriminatory residency preferences. HUD also informed Ms. Carter that any preferences for WHA’s Section 8 program must be contained in its administrative plan.

37. Ms. Carter followed up by phone with Ms. Henderson at WHA, informing her that the residency requirement violated HUD regulations. Ms. Carter also asked to see WHA’s administrative plan, but WHA refused to provide it. Ms. Henderson told Ms. Carter: “Well, I

¹⁰ According to 2010 ACS 5-year estimates, the population of Bridgeport is 25.6% White, non-Hispanic; 34.4% African-American; and 35.4% Hispanic. The population of New Haven is 32.2% White, non-Hispanic; 35.6% African-American; and 25.7% Hispanic. The population of Torrington is 86.5% White, non-Hispanic; 1.7% African-American; and 7.6% Hispanic. *See* ACS Demographic and Housing Estimates, 2006-2010 ACS 5-Year Estimates, DP05, Bridgeport, New Haven, and Torrington, available at <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>.

am still not sending you the paperwork.” Ms. Henderson refused to answer whether WHA’s residency requirement was part of its administrative plan.

38. Devastated that she and her family were being denied housing and fearful of the prospect of prolonged living in homeless shelters and other unstable housing situations, Ms. Carter sought help from Statewide Legal Services of Connecticut, Inc., and her case was eventually referred to CFHC.

D. CFHC’s Investigation Confirms That WHA Utilizes a Discriminatory Residency Requirement.

39. CFHC has spent and continues to spend a substantial amount of its scarce resources helping Ms. Carter in her search for housing, and in researching, investigating, and counteracting WHA’s unlawful conduct.

CFHC’s Testing of WHA’s Unlawful Residency Requirement

40. After learning about Ms. Carter’s treatment by WHA, CFHC conducted testing of WHA. This testing confirms that WHA’s administration of its Section 8 program is unlawful. CFHC testers who posed as residents of towns within the Rental Assistance Alliance received applications for WHA’s Section 8 Housing Choice Voucher Program without difficulty, whereas testers representing that they did not reside in the Rental Assistance Alliance were denied applications and prevented from even applying to WHA’s Section 8 program.

41. CFHC testers posed as residents of Litchfield and Cornwall (both of which are part of the Rental Assistance Alliance), and contacted WHA by telephone to gather information about the Section 8 program’s waiting list, as well as to obtain applications. A recorded message indicated that WHA was only sending applications to residents of their 17 allied towns. The message further instructed those callers who lived within the 17 allied towns and were interested in an application to leave their name and address; the recording also informed callers that

applications were mailed on a weekly basis. Testers left their names, phone numbers, and mailing addresses for towns in the Rental Assistance Alliance. WHA mailed requested applications to these addresses.

42. CFHC testers using addresses outside of the Rental Assistance Alliance were prevented from applying to WHA's Section 8 program. CFHC testers posed as residents of Middletown and Hartford (both of which are not part of the Rental Assistance Alliance), and contacted WHA by telephone to gather information about the Section 8 program's waiting list, as well as to obtain applications. A recorded message stated: "We are only sending out applications to residents of our 17 allied towns. For a complete list, go to winchesterhousingauthority.org. If your town is listed, please leave your first and last name, and complete address. Applications are mailed out weekly." These testers left messages using addresses of towns not in the Rental Assistance Alliance. WHA never sent applications to the addresses provided by these testers, and WHA never contacted these testers.

43. In one instance, a tester who called WHA dialed the extension for a WHA employee named Ms. Hayes, and a woman answered the tester's call. The woman told the tester that WHA was only accepting applications from residents of the local towns; the woman asked the tester where she lived. When the tester informed the woman that she lived in Hartford, the woman informed the tester that WHA does not accept applications from Hartford residents.

44. WHA's investigative testing confirms that WHA utilizes a residency requirement, entirely precluding prospective applicants who do not already live in one of the overwhelmingly-White Rental Assistance Alliance towns from applying to, or becoming beneficiaries of, its Section 8 voucher program.

CFHC's Further Investigation of WHA's Unlawful Residency Requirement

45. Although WHA refused to provide Ms. Carter a copy of its Administrative Plan, CFHC's investigation revealed that in October 2010, WHA expressly enacted its unlawful residency requirement, approving the following amendment to Section 4.4.1.1 of its Administrative Plan:

Due to increased costs involving postage and personnel time to process applications, The Winchester Housing authority will be accepting applications from local families only (Winsted and its allied towns) for the Housing Choice Voucher Program (Section 8) waiting list. This is a temporary measure due to the present economic conditions.

46. CFHC's investigation has revealed that, consistent with the express requirement that WHA will only accept applications from applicants in the Rental Assistance Alliance, WHA in fact prohibits non-residents from applying to its Section 8 program. Not only do CFHC's testing results confirm that conclusion, WHA advertises that it precludes non-residents from applying. Via the phone number listed on its website (860-379-4573), the automated message system used by WHA to direct incoming phone calls stated at the time of filing of the first Complaint in the above-styled action: "We are only sending applications to residents of our 17 allied towns. For a complete list, please visit winchesterhousing.org. If you live in one of the 17 allied towns, please speak clearly and slowly"

47. In addition, at the time of filing of the first Complaint in the above-styled action, various pages of the WHA website, <http://winhouseauth.org/hudsection8.html>, expressly advertised: "We are **ONLY** taking applications from residents of our Rental Assistance Alliance at this time." (emphasis in original). A screenshot of a page of WHA's website advertising this unlawful requirement is included as Attachment 3.

48. The WHA website also includes numerous pictures, collectively showing dozens of individuals. Only one picture, which depicts a family that appears Asian or Asian American,

includes individuals who do not appear non-Hispanic and White.¹¹ WHA's website includes no pictures of African-Americans or Hispanics.

49. WHA's express advertising of its residency requirement, and its failure to use any African-American or Hispanic individuals in its advertising, indicates a preference for White applicants and against applicants who are African-American or Hispanic. WHA's advertising discourages minority applicants from applying to its programs on the basis of their race and national origin. This advertising further perpetuates segregation in the Rental Assistance Alliance towns by discouraging African-Americans and Hispanics from seeking housing there.

WHA Also Continues To Impose an Unlawful Residency Preference

50. WHA imposes a discriminatory residency preference in its operation of its Section 8 program. Applicants that are on the waiting list who can show that they already live in one of the towns in the Rental Assistance Alliance are given preference and placed higher on the waiting list than non-residents.

51. On February 25, 2002 the WHA Board of Commissioners passed a resolution to change its Section 8 admissions policy to read:

The Winchester Housing Authority (WHA) does utilize local preferences for those towns that have passed a resolution authorizing the WHA to provide rental assistance to their residents in the form of Section 8 vouchers provided to the WHA by the United States Department of Housing and Urban Development.

52. The towns that have passed a resolution authorizing the WHA to provide rental assistance to their residents are the towns that constitute the Rental Assistance Alliance.

53. Because of the limited number of vouchers and the great number of "residentially-preferred" applicants, no non-residential applicant has been awarded a Section 8 voucher from WHA.

¹¹ See Winchester Housing Authority Website, available at <http://winhouseauth.org/> (last visited July 30, 2012).

54. By imposing a “residency preference,” WHA precludes applicants who cannot prove that they already live in one of the towns in the Rental Assistance Alliance from receiving Section 8 vouchers from WHA.

E. Through Its Illegal Residency Requirement and Preference, WHA Intentionally Discriminates Against and Disproportionately Harms African-Americans and Hispanics.

WHA’s Residency Requirement Was Intentionally Enacted In Response to An Increase In Minorities on the Section 8 Waiting List

55. WHA’s illegal residency requirement was enacted in response to a sharp increase in the number of African-American and Hispanic applicants on the WHA Section 8 voucher waiting list.

56. In its Annual Plan submitted to HUD for the year 2000, WHA reported that 89% of the families on its Section 8 waiting list were “White Non-Hispanic,” while only 1% were “Black Non-Hispanic” and 10% were “Black/Hispanic.”

57. By 2010 (but prior to WHA’s 2010 amendment expressly limiting its Section 8 program only to “local” applicants), WHA reported to HUD that only 59.63% of families on the Section 8 waiting list were “White Non-Hispanic,” while 5.05% were “Black Non-Hispanic.” Unlike in 2000, WHA did not report a percentage for “Black/Hispanic.”

58. These numbers indicate that WHA’s illegal residency requirement was enacted in response to substantial decreases in the “White Non-Hispanic” applicants on the Section 8 waiting list and substantial increases in the “Black Non-Hispanic” applicants on the Section 8 waiting list.

59. WHA was aware of the increases in “Black Non-Hispanic” and decreases in “White Non-Hispanic” applicants on its Section 8 waiting list.

60. WHA was aware that residents of the towns in the Rental Assistance Alliance were disproportionately white, non-minority, especially compared to populations in neighboring towns and cities.

61. WHA was aware that Section 8 residency requirements are illegal and that in predominately white communities they perpetuate racial and national-origin housing segregation. WHA was also aware that Section 8 residency preferences imposed by housing authorities in predominately white communities are discriminatory because they perpetuate racial and national-origin housing segregation.

62. WHA was aware that imposing its residency requirement and preference would prohibit most African-American and Hispanic prospective applicants from admission to the Section 8 waiting list and prevent them from receiving Section 8 vouchers and moving into communities in the Rental Assistance Alliance.

63. WHA intentionally imposed its residency requirement and preference, and continues to impose its residency preference, in order to discriminatorily preclude African-Americans and Hispanics from obtaining housing through its Section 8 program.

64. WHA intentionally discourages African-Americans and Hispanics from applying to its Section 8 program and intentionally steers those who do attempt to apply to other Section 8 housing programs outside of the Rental Assistance Alliance.

WHA's Discriminatory Residency Requirement and Preference Perpetuate Segregation and Disproportionately Harm African-Americans and Hispanics

65. Because the populations of Winchester and the other sixteen towns in the Rental Assistance Alliance are overwhelmingly White, non-Hispanic, Winchester's illegal residency requirement and preference favor White, non-Hispanic applicants, who have free access to the

waiting list and Section 8 program, and excludes most African-American and Hispanic families from any chance at all of participating in WHA's Section 8 program.

66. Included as Attachment 1 is a map of the Rental Assistance Alliance and three "comparator" regions. The Rental Assistance Alliance is represented in green on the map. The comparator regions roughly represent three quarter-concentric circles, moving out from the towns in the Rental Assistance Alliance. The three comparator regions include the towns in the Rental Assistance Alliance, as well as Torrington, which is sandwiched among the towns in the Rental Assistance Alliance but is not itself part of the Alliance. Comparator Region 1 includes the towns in the Rental Assistance Alliance, as well as the towns in blue. Comparator Region 2 includes the towns in red, as well as the towns in Comparator Region 1 (including the towns in the Rental Assistance Alliance). Comparator Region 3 includes the towns in tan, as well as the towns in Comparator Region 2 (including the towns in Comparator Region 1 and the Rental Assistance Alliance).

67. A comparison between the population that is "very low income" (and therefore income-eligible to participate in the Section 8 voucher program) in the Rental Assistance Alliance and the very low-income populations in the three comparator regions demonstrates that WHA's residency requirement and preference disproportionately exclude almost all African-American and Hispanic applicants.¹² A table representing these drastic racial and national origin differences is included as Attachment 4.

¹² Households with annual incomes that do not exceed 50% of the HUD Adjusted Median Family Income are defined as "very low income" and are eligible to participate in the Section 8 voucher program. *See* 24 C.F.R. § 982.201(b)(1)(i); *id.* § 5.603(b). Households with annual incomes that do not exceed 80% of the area median income are defined as "low income" and may also be eligible. *See id.* "Extremely low income" households, which have incomes that do not exceed 30% of the median area income, are also eligible. *See id.* Although the figures provided in paragraphs 67-71 discuss very-low income households, comparisons of low income and extremely low income households exhibit similarly stark disparities between the towns in the Rental Assistance Alliance and the neighboring communities in the comparator regions. *See* Attachment 4.

68. Using 2005-2009 Comprehensive Housing Affordability Strategy (“CHAS”) data, only about 0.08% of the very-low income households in the Rental Assistance Alliance are non-Hispanic Black. In comparison, the percentages of very-low income non-Hispanic Black households in the three comparator regions range from 17.70% to 19.84%.

69. Similarly, approximately 2.76% of the very-low income households in the Rental Assistance Alliance are Hispanic. In comparison, the percentages of very-low income Hispanic households in the three comparator regions range from 22.17% to 26.00%.

70. A comparison of the absolute numbers of very-low income households is even starker. Only 4 Black households in the Rental Assistance Alliance are very-low income, compared with between 15,689 and 36,006 households in the three comparator regions. Similarly, only 139 Hispanic households in the Rental Assistance Alliance are very-low income, compared with between 22,179 and 45,465 households in the three comparator regions.

71. WHA’s residency requirement and preference not only disproportionately affect African-Americans and Hispanics and perpetuate segregation in the towns that make up the Rental Assistance Alliance, the residency requirement literally prohibits tens of thousands of income-eligible African-American and Hispanic households from even applying to its Section 8 program. Likewise, the residency preference prohibits tens of thousands of income-eligible African-American and Hispanic households from participating in the Section 8 program and receiving Section 8 vouchers.

72. As a result of WHA’s unlawful administration of its Section 8 program, a disproportionately small number of beneficiaries who have actually received Section 8 vouchers from WHA are minority. As part of its investigation, CFHC uncovered a WHA document printed from WHA’s “Happy software system,” which WHA uses to maintain its Section 8

program. The document, labeled “Tenant List, April 13, 2012, Since 2001,” shows 118 White tenants, but reveals only 6 Black/African-American tenants.

73. WHA is aware of the disproportionately high percentage of White and non-Hispanic residents in the towns that constitute the Rental Assistance Alliance, especially compared to the towns neighboring the Rental Assistance Alliance. Likewise, WHA is aware that implementing a residency requirement and preference in favor of “local” residents from these towns excludes a disproportionate percentage of income-eligible Hispanic and African-American applicants from WHA’s Section 8 program.

74. Because the populations in all of the towns in the Rental Assistance Alliance are overwhelmingly non-Hispanic White, WHA’s illegal residency requirement and preference maintain and reinforce the racially segregated housing patterns in those towns, and they have a substantial adverse disparate impact on African-American and Hispanic residents of Connecticut who do not live in one of the seventeen communities in the Rental Assistance Alliance.

75. As one court explained, “[p]redominantly white suburban communities have enacted a Section 8 preference to bring their own residents to the front of the line for housing vouchers. That there *will be* a disparate impact over time seems clear.” *Langlois*, 234 F. Supp. 2d at 57 (emphasis in original). That impact is magnified here because WHA has employed not just a discriminatory preference favoring local residents on the waiting list, but also an absolute requirement banning all applicants who do not already reside in one of the overwhelmingly-White Rental Assistance Alliance communities from a chance of obtaining housing.

F. WHA's Discriminatory Conduct Since the Filing of Plaintiffs' Complaint Has and Is Continuing to Harm Plaintiffs.

76. On August 1, 2012, Plaintiffs filed their Complaint in the above-styled action. On August 8, 2012, in response to Plaintiffs' Complaint, WHA invited Ms. Carter to apply to the WHA Section 8 program, despite the fact that it had previously precluded her from applying.

77. On August 8, 2012, in response to Plaintiffs' Complaint, WHA decided to close the WHA Section 8 waiting list and not accept any further applicants, effective October 1, 2012.

78. In August 2012, before WHA closed its Section 8 waiting list, Ms. Carter applied to the WHA Section 8 program.

79. WHA determined that Ms. Carter was eligible for assistance from the Section 8 program. On October 15, 2012, WHA informed Ms. Carter of her eligibility and it placed her on the WHA Section 8 waiting list. *See* Attachment 5.

80. WHA will give preference to applicants that are already residents of the Rental Assistance Alliance over Ms. Carter. Resident applicants who apply to the WHA Section 8 program after Ms. Carter will receive Section 8 vouchers and be provided the opportunity to rent housing within a town in the Rental Assistance Alliance before Ms. Carter and other non-resident applicants on the waiting list.

81. Because of the large number of applicants and the preference WHA gives to resident applicants, it is nearly certain that Ms. Carter will not receive Section 8 rental assistance and will not be provided the opportunity to rent housing in a town in the Rental Assistance Alliance. If she does receive Section 8 rental assistance, it will be after a substantially longer wait than those experienced by resident applicants.

82. The preferred resident applicants that are provided Section 8 rental assistance are disproportionately White and non-Hispanic compared to the non-resident applicants. This disparate treatment is a direct result of WHA's discriminatory residency preference.

G. WHA's Unlawful Conduct Has Injured Plaintiffs Carter and CFHC.

83. WHA, directly and through its representatives and agents, discriminated against Ms. Carter on the basis of her race. Ms. Carter has suffered and continues to suffer damage as a result of WHA's actions. She has suffered emotional harm, humiliation, and embarrassment resulting from being discriminated against in violation of her civil rights. She has been denied housing and an equal, non-discriminatory opportunity to seek Section 8 housing assistance. As a result, she and her family have been forced to live in extremely unstable, unsafe, unhealthy, and inadequate conditions in lower opportunity areas for over a year. During this period and under these conditions, she has had to conduct an extremely difficult and time-consuming search for safe and stable housing for her family. The WHA's policies and actions caused an enormous strain on Ms. Carter, the sole provider for her six children. Her children missed weeks of school due to relocation to the motel; the cramped quarters caused stress and anxiety for her children, negatively affected their behavior, their nutrition, their rest, their education, their interactions with each other and with their mother. These events have been traumatic and harmful to Ms. Carter. She has no adequate remedies at law, and is now suffering, and will continue to suffer, irreparable injury from WHA's acts unless relief is provided by this Court.

84. Plaintiff CFHC has suffered, and continues to suffer, injury in the form of diversion of its resources and frustration of its mission. CFHC has expended substantial staff time and funds to investigate WHA's Section 8 program, which has been used to deny access to federally-funded housing assistance to minorities and to perpetuate residential racial segregation

in Winchester and the surrounding communities. As part of its investigative efforts, CFHC staff conducted testing and research. CFHC also engaged in an extensive community outreach campaign, which included distributing hundreds of flyers, handouts, and/or brochures to voucher holders throughout Connecticut both to educate this population about illegal residency requirements and to identify individuals who had been denied housing or placement on a waiting list based upon residency. Additionally, as part of its outreach to combat residency requirements and discriminatory residency preferences, CFHC gave informational talks, held a fair housing training for a client agency, and counseled individual clients. Considerable administrative resources have gone toward creating materials for distribution, logistics, and coordinating outreach efforts. In order to finance these activities, CFHC had to use a significant amount of money from its reserves. In the absence of WHA's discriminatory residency requirement and preference, CFHC would have devoted its scarce time and resources to other activities.

85. Because Defendant operates its Section 8 program in a way that ensures that the towns in the Rental Assistance Alliance are not open and inclusive, but rather, closed and racially restrictive as described above, Defendant is frustrating CFHC's mission to foster open and inclusive communities and eliminate housing discrimination throughout Connecticut. As described above, Defendant intentionally discriminates on the basis of race, color, and national origin in the operation of its Section 8 program in a manner to make housing opportunities unavailable and to continue to maintain racially segregated housing patterns in Winchester and the surrounding communities. Additionally, WHA's administration of its Section 8 program has a disparate impact on African-Americans and Hispanics based on race, color, and national origin, which further frustrates CFHC's mission of fostering open and integrated housing.

86. Defendant, in acting, refusing to act, or otherwise failing to act as alleged in this Complaint, was acting through its employees, agents, and/or representatives, and is liable on the basis of the acts and omissions of its employees, agents, and/or representatives.

87. Defendant's unlawful actions described above were, and are, intentional, willful, and knowing, and/or have been, and are, implemented with callous and reckless disregard for Plaintiffs' rights under federal law.

FIRST CAUSE OF ACTION
(Fair Housing Act, 42 U.S.C. § 3601, *et seq.*)

88. Plaintiffs repeat and re-allege the foregoing paragraphs of the Complaint as though fully set forth herein.

89. Defendant's policy and practice of using residency requirements and/or preferences and otherwise prohibiting or discouraging minorities from applying to or participating in its Section 8 program make unavailable and deny rental housing because of race, color, and national origin, in violation of the Fair Housing Act, 42 U.S.C. § 3604(a).

90. Defendant's policy and practice of using residency requirements and/or preferences and otherwise prohibiting or discouraging minorities from applying to or participating in its Section 8 program discriminate in the terms, conditions, or privileges of the rental of a dwelling because of race, color, and national origin, in violation of the Fair Housing Act, 42 U.S.C. § 3604(b).

91. Through its policy and practice of using residency requirements and/or preferences and otherwise prohibiting or discouraging minorities from applying to or benefiting from its Section 8 program Defendant has made, printed, or published, or caused to be made, printed or published notices, statements, or advertisements with respect to the rental of a dwelling that indicate a preference, limitation, or discrimination based on race, color, or national

origin, or an intention to make any such preference, limitation, or discrimination, in violation of the Fair Housing Act, 42 U.S.C. § 3604(c).

92. Plaintiffs have been injured by Defendant's discriminatory conduct and have suffered damages as a result.

93. Defendant's conduct was intentional, willful, and made in reckless disregard for the known rights of others.

SECOND CAUSE OF ACTION
(Connecticut Tort of Negligence Per Se)

94. Defendant's policy and practice of using residency requirements and/or preferences and otherwise prohibiting or discouraging minorities from applying to or participating in its Section 8 program breached a duty owed to Plaintiffs.

95. Pursuant to 24 C.F.R. § 982.207(b)(1), Defendant had a duty not to impose residency requirements or discriminatory residency preferences in its Section 8 program. Defendant's policy and practice of using residency requirements and/or preferences and otherwise prohibiting or discouraging minorities from applying to or participating in its Section 8 program violates the duty established by 24 C.F.R. § 982.207(b)(1), and Defendant's conduct is therefore negligent as a matter of law. Plaintiffs are within the class of persons protected by 24 C.F.R. § 982.207(b)(1), and their injuries are the types of injuries 24 C.F.R. § 982.207(b)(1) was intended to prevent.

96. Defendant's breach of its duty to Plaintiffs proximately caused injuries to Plaintiffs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that judgment be entered against Defendant as follows:

- a. Declaring that Defendant's actions violate the Federal Fair Housing Act, 42 U.S.C. § 3601, *et seq.* and are per se negligent;
- b. Permanently enjoining Defendant WHA from engaging in the conduct described herein and directing Defendant to take all affirmative steps necessary to remedy the effects of the conduct described herein and to prevent additional instances of such conduct or similar conduct from occurring in the future;
- c. Awarding all available damages to Plaintiffs, including but not limited to punitive damages in an amount that would punish Defendant for the willful, wanton and reckless conduct alleged herein and that would effectively deter similar conduct in the future;
- d. Awarding reasonable attorneys' fees and costs under 42 U.S.C. § 3613(c);
- e. Awarding such other and further relief as this Court may deem just and proper.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues so triable.

Dated: November 30, 2012

Respectfully Submitted,
/s/ John P. Relman
John P. Relman*
Jia Cobb*
Stephen F. Hayes*
RELMAN, DANE & COLFAX, PLLC
1225 19th St., NW, Suite 600
Washington, D.C. 20036-2456
Tel: 202-728-1888
Fax: 202-728-0848
E-mail: jrelman@relmanlaw.com
jcobb@relmanlaw.com
shayes@relmanlaw.com

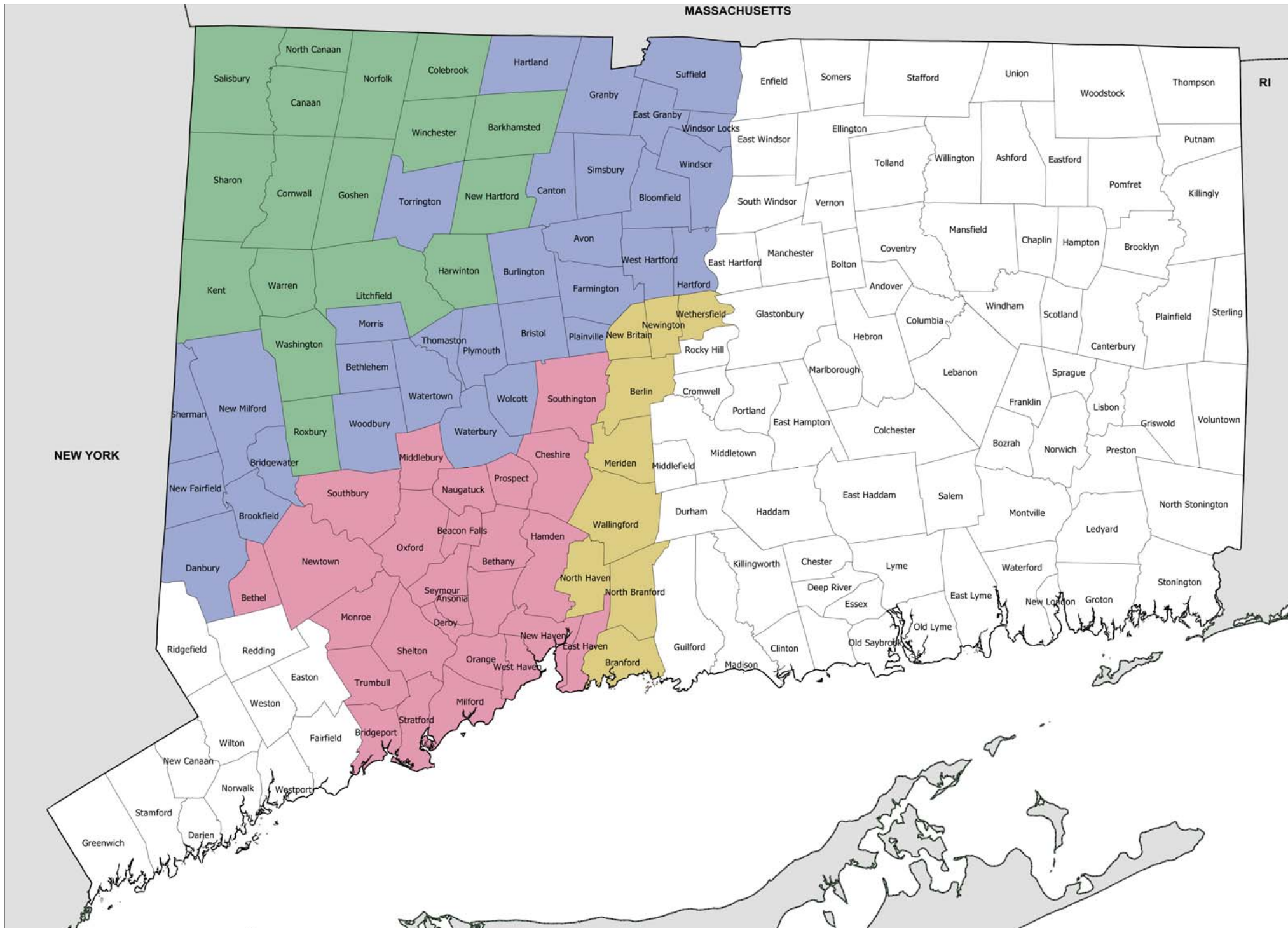
Greg Kirschner [ct26888]
Timothy Bennett-Smyth [ct27615]
THE CONNECTICUT FAIR HOUSING CENTER
221 Main St., 4th Floor
Hartford, CT 06106
Tel: (860) 263-0728
Fax: (860) 247-4236
Email: greg@ctfairhousing.org
tsmyth@ctfairhousing.org

Counsel for Plaintiffs

** Admitted to appear pro hac vice*

ATTACHMENT

1



ATTACHMENT

2


Demographic Characteristics for Occupied Housing Units, 2006-2010 ACS 5-Year Estimates, S2502, for all towns in the Rental Assistance Alliance¹

Location	% Occupied Units, White, Non-Hispanic	% Occupied Units, Hispanic	% Occupied Units, African American	% Renter Occupied Units White, Non-Hispanic	% Renter Occupied Units, Hispanic	% Renter Occupied Units, African American
Connecticut	77.2	9.8	8.9	56.5	20.7	17.1
Barkhamsted	100.0	0.0	0.0	100.0	0.0	0.0
Canaan	97.9	0.9	0.5	95.4	2.6	0.0
Colebrook	98.4	0.9	0.0	100.0	0.0	0.0
Cornwall	96.2	2.4	0.0	94.6	3.4	0.0
Goshen	98.4	1.6	0.0	100.0	0.0	0.0
Harwinton	97.2	0.0	0.8	100.0	0.0	0.0
Kent	96.5	0.0	0.0	94.4	0.0	0.0
Litchfield	98.4	1.2	0.0	98.7	1.3	0.0
New Hartford	98.6	0.6	0.0	100.0	0.0	0.0
Norfolk	96.7	2.1	0.0	100.0	0.0	0.0
North Canaan	98.1	1.2	0.0	95.7	4.3	0.0
Roxbury	96.8	2.9	0.0	88.7	11.3	0.0
Salisbury	91.7	2.0	2.1	90.2	7.5	0.0
Sharon	95.4	3.5	0.0	85.6	14.4	0.0
Warren	94.3	5.2	0.0	100.0	0.0	0.0
Washington	94.4	4.5	0.0	82.9	17.1	0.0
Winchester	94.5	4.5	0.0	94.0	5.4	0.0

¹ The data provided in the following table is from Demographic Characteristics for Occupied Housing Units, 2006-2010 ACS 5-Year Estimates, S2502, for all towns in the Rental Assistance Alliance, available at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>.

ATTACHMENT

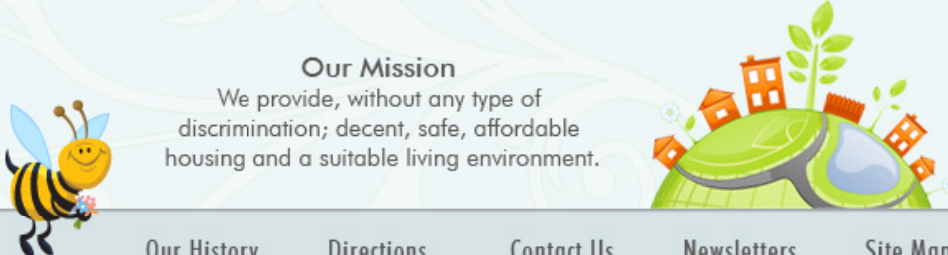
3




80 Chestnut Street • Winsted, CT 06098
(860) 379-4573

Our Mission

We provide, without any type of discrimination; decent, safe, affordable housing and a suitable living environment.



[Home](#)
[From the Executive Director](#)
[Our History](#)
[Directions](#)
[Contact Us](#)
[Newsletters](#)
[Site Map](#)

Equal Housing Opportunity 

Senior Housing

- Program Overview



Housing Choice Voucher Program (Section 8 - HUD)

- Program Overview
- Applicant Information
- Landlord Information
- Housing Quality Standards
- Rental Assistance Alliance
- How To Apply

Single Room Occupancy (SRO)

- Program Overview
- How To Apply

Housing Choice Voucher (HCV) Program Overview

The **Housing Choice Voucher (HCV) Program (HUD — Section 8)** is the Federal government's major program for assisting very low-income families, the elderly and the disabled decent, safe and affordable housing in the private market.

The Winchester Housing Authority primarily services families and individuals within Winsted and the [surrounding communities](#).

Since housing assistance is provided on behalf of the family or individual; participants are able to find their own housing that meets the requirements of the program. Housing Choice Vouchers (HCVs) are administered locally by a Public Housing Authority (PHA). The PHA receives Federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program.

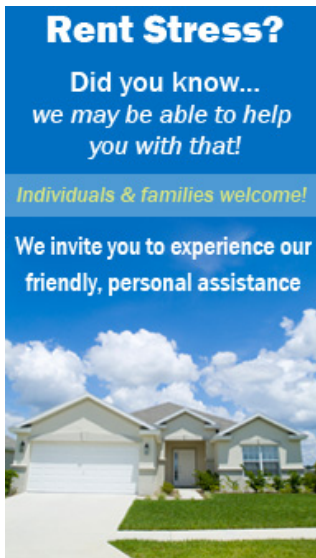


The housing unit selected must meet an acceptable [level of sanitation and safety](#) before the PHA will approve the unit. When the voucher holder finds a unit they wish to occupy and reaches an agreement with the owner/landlord over the lease terms, the PHA must inspect the dwelling and determine that the rent requested is reasonable.

A housing subsidy is paid to the owner/landlord directly on behalf of the participating family or individual, by the PHA. The family or individual then pays the difference between the actual rent charged by the owner/landlord and the amount subsidized by the program.

The family or individuals portion of the rent is based on their income so **it is the family or individuals responsibility** to notify the PHA of any changes in income or household composition immediately. **Failure to do so is considered fraud.**

At least annually, the voucher holder must re-establish eligibility for the program. The unit is re-inspected, by the PHA, to ensure that it continues to meet the Section 8 — HUD standards.



To apply, or for more information, on the Housing Choice Voucher (HCV) Program (Section 8 — HUD)

Call (860) 379-7001 option 1 (*spell your name and address clearly*)
and an application will be mailed to you.

* We are **ONLY** taking applications from residents of our [Rental Assistance Alliance](#) at this time. All other application requests will not be given preference at this time.

Note: The [Housing Choice Voucher Program](#) and the [Single Room Occupancy Program](#) are different applications. To ensure you receive the application you'd like, **please specify (in your voicemail) which program you are applying for.**

All rights reserved ~ Copyright © 2011
Winchester Housing Authority • 80 Chestnut Street • Winsted, CT 06098
Phone: (860) 379-4573 | Fax: (860) 379-0430



- [board meeting minutes](#) -

ATTACHMENT

4

Households Below HUD Adjusted Median Family Incomes (HAMFI) Based on 2005-2009 ACS Comprehensive

Housing Affordability Strategy Data

	Total eligible	White eligible	Black eligible	Hispanic eligible	% White eligible	% Black eligible	% Hispanic eligible
<u>30% HAMFI (Extremely low income)</u>							
Rental Assistance Alliance	2,353	2,294	0	59	97.49%	0.00%	2.51%
Comparator 1	48,663	24,136	9,717	14,810	49.60%	19.97%	30.43%
Comparator 2	96,069	50,400	21,116	24,553	52.46%	21.98%	25.56%
Comparator 3	112,943	61,050	22,395	29,498	54.05%	19.83%	26.12%
<u>50% HAMFI (Very low income)</u>							
Rental Assistance Alliance	5,041	4,898	4	139	97.16%	0.08%	2.76%
Comparator 1	85,295	47,427	15,689	22,179	55.60%	18.39%	26.00%
Comparator 2	171,715	99,591	34,063	38,061	58.00%	19.84%	22.17%
Comparator 3	203,422	121,951	36,006	45,465	59.95%	17.70%	22.35%
<u>80% HAMFI (Low income)</u>							
Rental Assistance Alliance	8,846	8,570	14	262	96.88%	0.16%	2.96%
Comparator 1	128,222	78,002	21,838	28,382	60.83%	17.03%	22.14%
Comparator 2	262,289	162,280	48,882	51,127	61.87%	18.64%	19.49%
Comparator 3	313,559	200,345	51,818	61,396	63.89%	16.53%	19.58%

ATTACHMENT

5

Winchester Housing

80 Chestnut Street, Winsted CT 06098



Equal Housing Opportunity



Senior Housing (860) 379-4573
Housing Choice Voucher Program (860) 379-7001
Fax (860) 379-0430
www.winchesterhousing.org

Anthony J. Palge, Jr., *Chairman*
John R. Sullivan, *Vice-Chairman*

Neil R. Kelsey, *Treasurer*
June D. Mickley, *Asst. Treasurer*

John Iacino, *Commissioner*
Fred W. Newman, *Executive Director*

October 15, 2012

Crystal Carter
c/o Timothy Bennett-Smyth (CTFHC)
221 Main Street, 4th Flr
Hartford, CT 06106

Ms. Carter:

Based on the information contained in your Preliminary Application, we are pleased to inform you that you are eligible for assistance on the (Section 8) Housing Choice Voucher (HCV) Program. You have been placed on our waiting list; however, due to the limited funding, assistance cannot be provided immediately to new applicants.

Our funding from the Department of Housing & Urban Development (HUD) allows us to help three groups of people: 1. Disabled persons (those collecting Social Security disability income)

2. Elderly persons 62 +years old
3. Families with two or more persons
living together, i.e. parents, children etc.

If your name comes to the top of the wait list and you are not collecting Social Security or Social Security Disability or you are not 62 years of age or older, or you are not responsible for a family, you will not be eligible for a Housing Choice Voucher.

Please be advised that our office will conduct a police check for each family member who is 18 years of age or older. Housing Authority Policy prohibits assisting those applicants or family members who are currently on probation for a felony charge, drug charge, or violent criminal activity within the last three years.

Should your address change, you must notify us in writing immediately. Please notify us by mail at: Housing Choice Voucher Program, Winchester Housing Authority, 80 Chestnut Street, Winsted, CT 06098. Letters that are returned by the U.S. Postal Service that are marked "Moved, Unknown Address", etc. will result in the applicant being removed from the waiting list.

Sincerely,

Jayne Martigneni
HCV Program Coordinator

Sincerely,


Carol A. Henderson
HCV Program Assistant