

Socket entry
shows leave
to indwelling
granted, 9/21/71

2. That pursuant to various agreements between Chicago Housing Authority (CHA) the Department of Housing and Urban Development (HUD), American Arbitration Association (AAA) and tenant groups of the various housing developments of CHA, an election was held in the City of Chicago on July 11, 1971 for the purpose of electing representatives to Nineteen (19) Advisory Local Councils and to the Central Advisory Council, your petitioner herein. That said election was conducted and supervised by AAA and all the tenants and other residents 21 years of age and over, participated in said election and elected more than 800 representatives to the various local councils and sixty four (64) representatives to the Central Advisory Council.

3. That, in accordance, with the terms of the by-laws and a certain Memorandum of Accord executed by CHA this petitioner and approved by HUD, and ratified after the election of July 11, 1971, your petitioner is the duly organized and constituted organization which represents the ~~total~~ interest ^{for the purposes of the agreement} of residents of the developments of CHA and your petitioner is the organization which has the responsibility for policies and programs which aim at improving the quality of life of all the residents of the developments of CHA.

4. That although this petitioner was not a party to the Gautreaux Case 66 C 1460, in the judgement of this Court therein entered on July 1, 1969, the CHA tenants all of whom constitute the membership of your petitioner, were specifically enumerated as parties in interest in various ordering sections of said judgement more particularly in Paragraph VI thereof.

5. That the petitioner by action of its Executive Committee at a special meeting duly called on the 20th day of September 1971 authorized the attorneys for the petitioner to file a petition for leave to intervene in the instant proceedings as an additional party defendant.

6. That this Petitioner is informed and believes, and on such information and belief represents the facts to be, that the present Model Cities program, the release of which funds the plaintiffs seek to enjoin is providing or intends to provide, during a term expiring in May 1971, the following services for the amounts shown below:

EXECUTED CONTRACTS - Thirty-Two(32)

<u>Project</u>	<u>Description</u>	<u>Amount</u>
#1481	Health Centers	\$2,267,657.
#1486	Information & Referral	38,330.
#2381	Land Acquisition	280,488.
#2384	Threshold	37,679.
#2581	Leasing Program	1,000,000.
#3287	Summer Program	15,522.
#3387	Summer Beautification	276,781.
#3581	Urban Intern	37,508.

<u>Project</u>	<u>Description</u>	<u>Amount</u>
#3687	Mundelein (HICA)	122,742.
#3891	Chicago Public Library	98,977.
#3789	Kennedy-King	61,000.
#4182	Prevention of J/D	307,409.
#4186	Youth Service Homes	200,690.
#4188	Residential Apprentice	36,111.
#4581	Registrar of Citizen's Complaints	94,902.
#4685	Alternative	193,180.
#3881	Chicago Police Department	1,095,000.
#5188	Day Care	533,078.
#5384	CHA Day Care	121,126.
#5493	Services for Unmarried Mothers	342,591.
#5589	Foster Family Day Care	38,174.
#5681	Mayor's Office of Inquiry & Information	110,973.
#5785	Marillac House	41,798.
#6584	Dept. of Consumer Sales, Weights & Measures	123,776.
#6681	Mayor's Committee of Economic/ Cultural Development	105,274
#7782	Streets & Sanitation	1,527,077.
#8181	Department of Human Resources	278,006.
#8981	Model Cities Summer Program	29,996.
#9681	Contractor Compliance	81,706.
#9881	M.D.T.A. Training	248,985.
#9882	Mayor's Office of Manpower	1,092,247.
	Dr. Joseph Braga	4,530.
	Sub-Total	\$10,843,313.

IN-PROCESS CONTRACTS

#0001	Relocation	802,701.
#3187	Swimming Pool	133,825.
#3481	Co-Plus Administration	601,792.
#3482	New Careers	1,361,300.
#3483	Instructional Team Leaders	660,700.
#3484	Community School	547,631.
#3487	Co-Plus Nutrition	268,560.
#3488	Pre-School Program	506,189.
#3489	In-Service Co-Plus	283,700.
#3491	In-Service	540,360.

<u>Project</u>	<u>Description</u>	<u>Amount</u>
#3492	TESL	97,300.
#3493	Reading Cntr Hess	45,100.
#3494	Free Breakfast	492,530.
#3495	Improved Language Arts	112,900.
#3499	Summer Co-Plus	575,845.
#3498	Reading Project (Performance)	538,151.
#3583	Reading Project	27,216.
Sub-Total		\$7,595,800.
<u>PURCHASING</u>		
#1682	Cook County	218,000.
#2488	Community Bldg.	257,787.
#2783	Not-for-Profit Developers Arthur D. Little	198,766.
#6787	C.E.D.C.	113,652.
#6788	C.F.D.C.	1,300,476
Sub-Total		\$2,138,682.
<u>COMPTROLLER'S OFFICE</u>		
	Booz, Allen, Hamilton	70,000.
	Perkins and Will	49,785.
	Spa-Redco	45,815.
	W.V. Rouse	45,000.
	Daniel D. Howard	9,920.
	Project #5183 Services for Seniors	106,806.
Sub-Total		\$ 327,326.
<u>SUMMARY</u>		
EXECUTED CONTRACTS		\$10,843,314.
CONTRACTS IN SIGNATURE PROCESS		10,061,809.
TOTAL		20,905,123.
PROGRAM ADMIN.		1,687,228.
MULTI SERVICE CENTER		4,000,000.
Grand Total		\$26,592,351.

7. That for the purpose of making the services described in the preceding paragraph available to the persons intended to benefit therefrom, said persons are grouped in four TARGET AREAS, namely Near South, West, Mid-South, and North.

8. That 35.4% of the amount to be expended for the services described in paragraph 6 shall be for the Near South Target area, the boundaries of which are 39th Street to the North the New York Central Railroad to the West, 53rd Street to the South and Lake Michigan to the East.

9. That in the Near South Target areas are located two CHA developments namely Robert Taylor Homes and Washington Park Homes, the tenants thereof, being the members of this Petitioner, and their immediate families total 40,000 residents

10. That the estimated total population of the Near South Target area is approximately 115,000, and that the ratio of members of this Petitioner and their families to the total population of the TARGET AREA is 35.7%.

11. That the sum total of benefits accruing to the Target area from the continued implementation of the Model Cities program for the next seven months total approximately Nine Million Two Hundred and Four Thousand Dollars (9,204,000), nearly 40% of said program will benefit directly the membership of your Petitioner and their families.

12. That the following is a description of some of the programs which have benefited the membership of your Petitioner and their families.

(Project #1481)

1. HEALTH CENTER - Daniel Hale Williams Clinic 51st Street and Vincennes Avenue. Provides Comprehensive health services and is established to serve 1,000 families covering a unit service capacity of 4,000 persons.

(Project #3287)

2. SUMMER PROGRAM - Primarily to provide supplementary camping experiences for youngsters.

(Project #3891)

3. CHICAGO PUBLIC LIBRARY - Supplementary educational and cultural services to elementary school children in the Oakenwald, Woodson South and Hartigan public schools; two of these schools are located within Washington Park Homes, and one is located in Robert Taylor Homes. The primary purpose of this program is to provide bus transportation for participating students to the main Chicago Public Library on a regularly scheduled basis.

(Project # 3789)

4. KENNEDY-KING MINI-COLLEGE - (located in Grant Memorial Church - near Washington Park and Madden Park Homes), primarily to expand upon educational opportunities for area residents. This service is provided to 250 students:

50 - Adults
50 - Non High School Graduates
250 - 1st year College Students

The General Education Diploma is also granted through this special and far-reaching educational project.

(Project #4581)

5. PREVENTION OF JUVENILE DELINQUENCY - (Department of Human Resources Adjacent to Taylor Homes and Washington Park scattered sites. A cooperative service involving the Juvenile Court and Chicago Police; provides social and other corrective services to delinquents - in cooperation with parents and the institutional community.

(Project #6584)

6. DEPARTMENT OF CONSUMER SALES, WEIGHTS & MEASURES (located in Washington Park Homes) Provides comprehensive services in the total area of consumer education useful to residents in Washington Park, etc.

(Project #3482 et seq.)

7. COMMUNITY SCHOOL - NEW CAREERS - CO - PLUS ADMINISTRATION, CO - PLUS NUTRITION. - Established in three (3) elementary schools: Woodson South and Oakenwald (located in Washington Park Homes), and the Overton School (adjacent to Robert Taylor Homes)

Provides early Childhood Development services to a daily total of 360 children between the ages of 3 and 5 years, involving a total paid staff of 45 adults - primarily employed from the local neighborhoods.

In addition, the comprehensive and effective educational service provides for free breakfast and lunch programs.

Community evening schools are also established in these facilities, and are structured through local community involvement (Advisory Councils, each of three with an allocation of \$60,000 for program planning and each with a local membership of 25).

8. THEATER EXPOSURE COUNCIL (Y.M.C.A.) primarily to provide training in the cultural arts for 26 residents in the target area - 16 of whom reside in Robert Taylor Homes.
9. LEISURE TIME ACTIVITIES - Chicago Park District Taylor Homes Park. Primarily to supplement a wide range of recreational activities for neighborhood youngsters.

(Project #5384)

10. DAY CARE CENTER - Two centers with capacity for 100 children each. Thirty two jobs in this center out of which 26 jobs are held by CHA residents.

13. That although said projects do not meet all the needs of the community they are essential to the public health and welfare of the membership of your petitioner and their families.

14. That the plaintiffs in seeking the relief prayed in their motion are acting adversely to the rights of this petitioner and of its membership and full and complete justice cannot be done without the presence of the petitioner as a party herein.

15. That in the event that this Court grants this Petitioner's petition for leave to intervene the petitioner will pray that the plaintiff motion be dismissed for the following reasons.

- (i) - It fails to state a cause of action upon which any relief can be based for the reason that the plaintiff have failed to allege facts tending to show that the Model Cities program is in any manner connected with the previous order of this Court in the Gautreaux case 66 C 1459.

- (ii) - That the services rendered and to be rendered under the Model Cities program affect the present immediate day to day health, education and welfare of the membership of this petitioner, and any curtailment of such program even temporarily will cause irreparable harm to the petitioner's membership and their families.
- (iii)- That the programs are scheduled to be completed within seven months from date and thus cannot be in any way related to the site selections process referred to in plaintiffs' motion.
- (iv) - That in paragraphs 3, through 8 of the plaintiffs' motions the only reference to any failure to act has been that the City Council of the City of Chicago has failed to approve certain sites, therefore, the City Council of the City of Chicago, or the members thereof, are necessary defendants and ought to be joined.
- (v) - That the agreement recited between HUD and the City of Chicago cannot be evoked as a basis for an action against HUD by the plaintiffs herein.
- (vi) - That said agreement is void as to the petitioner herein, since it aims at depriving the applicant of benefits upon the failure to act of the City Council of the City of Chicago.
- (vii)- That to allow the plaintiffs' motion is to give to the City Council of the City of Chicago a pocket veto power against an instrumentality of the United States Government.

WHEREFORE, the petitioner prays as follows:

1. That it be made a party defendant herein.
2. That this petition stands as its responsive pleading to the motion heretofore filed by the plaintiffs.
3. That the Court deny the plaintiffs' motion and upon hearing allows the Model Cities program to continue to

serve the needs of the petitioners membership.

4. For such and further relief as may seem just.

CENTRAL ADVISORY COUNCIL

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