

# Exhibit 4



Safety  
Net  
Project

June 30, 2020

DHS Administrator Joslyn Carter  
Department of Homeless Services  
NYC Department of Social Services  
150 Greenwich Street  
New York, NY 10007  
[icarter@dhs.nyc.gov](mailto:icarter@dhs.nyc.gov)

**Re: Harassment of Advocates by DHS Contractors**

Dear Administrator Carter:

I am writing regarding the ongoing transfers of hotel residents to congregate facilities. As we have communicated via email, we remain deeply concerned that the Department is not complying with the legal requirement to provide 48-hour notice in all transfers, the Department has failed to provide accurate and full information to residents regarding reasonable accommodations, it continues to restrict residents' ability to request reasonable accommodations, and it is failing to process and honor reasonable accommodation requests as is legally required.

Given the misleading and inadequate information distributed by the Department, advocates from the Urban Justice Center's Safety Net Project (SNP) have been conducting outreach to distribute Know-Your-Rights material to residents outside hotel locations. Our outreach has been impeded by the conduct of DHS contractors as follows:

On June 17, 2021 at the Hilton Garden Inn, an Acacia employee told SNP staff that they could not be present on a public sidewalk outside of the hotel, when their presence and activity on the sidewalk was entirely lawful.

On June 20, 2021, our staff arrived at Mansfield Hotel to distribute Know Your Rights flyers. Someone who identified herself as a supervisor immediately came out and asked our staff member what she was doing. Our staff member stated that she was distributing flyers with Know Your Rights info. The supervisor stated that we could not flyer on the sidewalk in front of the building because it was private property. A security guard then came out and stated that our staff member could not stand in front of the building and threatened to call the police if she did not move immediately. When our staff member explained that she had a right to be on a public sidewalk, he raised his voice and again threatened to call the police. To de-escalate the situation, our SNP staff member moved a little further along the sidewalk to distribute the flyers. The supervisor again came out with a copy of the flyer in hand and stated that our flyers (which contain accurate information on residents' rights) were contrary to what they were doing at that location. The supervisor stated that our staff needed to leave because she was still on the

sidewalk in front of a section of the hotel. She again threatened to call the police if our staff member did not leave.

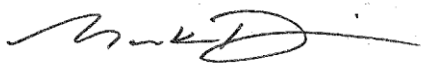
On June 22, 2021, an SNP staff member was present outside the Hilton Garden Inn, again attempting to provide residents with Know-Your-Rights information. Two Acacia staff members questioned the SNP advocate about what he was doing and complained about it to him. Shortly after, another Acacia employee was observed speaking with a man who later identified himself as "Black." "Black" approached our SNP staff member and said "we don't do this around here." He tried to get our staff member to go onto the hotel property and in eye-line of Acacia staff members, read the flier with him, and postured at one of the residents being transferred saying "you good? Ok, you're good." He then forcibly took all the fliers from the SNP staff member's hands, despite being asked not to do so. He went back inside the building, was observed talking with Acacia employees and laughing, after which he came out empty handed (presumably having thrown away our fliers) and stood in front of the entrance to the hotel.

Clearly this conduct was intended to intimidate and harass our staff, prevent residents from receiving information and services from our organization, and ensure that residents did not enforce their rights to request a reasonable accommodation and 48-hour notice.

We ask that DHS ensure its contractors cease and desist from this conduct and that DHS immediately advise all DHS contractors and staff as to the lawful rights of advocates in public spaces, including the right to distribute flyers as free speech protected under the First Amendment.

Should you have any questions regarding the above incidents, our office would be happy to discuss this further with you.

Sincerely,



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Cc. Commissioner Steven Banks  
DHS First Deputy Commissioner Molly Murphy  
General Counsel Martha Calhoun  
(All via e-mail)