

CIVIL DISTRICT COURT  
PARISH OF ORLEANS  
STATE OF LOUISIANA

FILED  
2009 SEP 29 A 11:20  
CIVIL  
DISTRICT

STAND WITH DIGNITY on behalf of itself )  
and its members including JOHNNYE )  
JACKSON, AISHA LEWIS, )  
TALBERT HAYWOOD, )  
and MERLINE KIMBLE, and )  
TAMAR MCFARLANE, )  
Plaintiffs, )  
)  
vs. )  
)  
HOUSING AUTHORITY )  
OF NEW ORLEANS, )  
Defendant. )

Civil Action No. 09-10285

Section  
D

PETITION FOR WRIT OF MANDAMUS  
AND INJUNCTIVE AND DECLARATORY RELIEF

PRELIMINARY STATEMENT

1. STAND and its members hereby file this petition for a writ of mandamus demanding the release of public documents. The Housing Authority of New Orleans' ("HANO") unlawful failure to provide the records is one in the latest in a series of arbitrary and unreasonable actions that harm the most vulnerable residents of this community— low-income renters, low-wage workers, struggling families, seniors, and homeowners who want to rent to low-income families as a means of supporting the right to return.
2. This petition for a writ of mandamus and other relief arises from a request for public records submitted to the Housing Authority of New Orleans ("HANO") on July 15, 2009, by STAND for Dignity, a grassroots membership organization that monitors and seeks to improve HANO's administration of the Housing Choice Voucher Program ("HCVP"), also known as Section-8, as an integrated component of a comprehensive plan for affordable housing in New Orleans.<sup>1</sup>

<sup>1</sup>The Housing Choice Voucher Program is commonly referred to as Section-8 in reference to the portion of the U.S. Housing Act of 1937 under which the original subsidy program was authorized. See 42 U.S.C. § 1437f (Chapter 8).

3. Impacted by HANO's well-documented mis-management, corruption, and neglect of its responsibility to create and implement a comprehensive affordable housing plan for New Orleans, STAND members have faced and continue to face an inability to live in New Orleans without suffering eviction, homelessness, inability to pay their rent and basic needs, and growing desperation.
4. During the summer of 2009, STAND and its members created external accountability mechanisms and documented how HANO's corruption continues to hamper the long term re-development of New Orleans. STAND's goal was to ensure affected low-income residents participate in the development and implementation of a plan to address the housing needs of the community's low-income families, including the immediate administration of a program resulting in the release of available Section-8 vouchers.
5. As part of those efforts, STAND submitted a request to HANO for public records concerning HANO's administration of the Section-8 voucher program. HANO's failure to produce the public records requested by STAND violates the Louisiana Public Records Law, and hinders STAND's ability to provide much-needed community oversight to ensure that HANO administers the Section 8 voucher program in accordance with law and in a way that best serves the community.
6. Thus, STAND and its members seek a writ of mandamus to compel HANO to release the requested records and an order awarding plaintiffs' attorneys fees, costs, civil penalties, and damages.

#### JURISDICTION

7. This Court has jurisdiction pursuant to the Louisiana Public Records Law, La. R. S. § 44.35(B).

#### VENUE

8. Venue in this parish is proper because the office of the custodian of records of HANO is located here. La. R. S. § 44.35(A).

## PARTIES

1. Plaintiff STAND with Dignity (“STAND”) is a grass roots membership organization of displaced and low-income families who have formerly experienced and/or are currently experiencing homelessness and displacement in New Orleans. STAND organizes in low-income African-American communities to ensure the rights and access of the most-vulnerable residents to a recovery plan that includes comprehensive affordable-housing solutions for southern Louisiana. STAND’s uses community organizing, policy advocacy, direct action, and leadership development to advance the values and goals of members and build on the vibrant experiences and values of the southern African-American community. STAND believes unity and self-determination are the most viable solution to ensure the human rights and dignity of devastated communities in New Orleans. STAND is a grassroots organizing project of the New Orleans Workers' Center for Racial Justice, a Louisiana non-profit organization.
9. Plaintiff Johnnye Jackson is senior citizen living on a fixed-income who is who has lived most of her life in uptown, New Orleans, Louisiana. Before Hurricane Katrina, she lived with her two adult sons who have not returned to the city. She is now forced to pay 83% of her income as rent and utilities at a senior home because she could not find any other alternatives that are both safe and affordable. Ms. Jackson is member of STAND.
10. Plaintiff Aisha Lewis is a mother of two young children who now lives in Algiers, Louisiana. Before Hurricane Katrina, she lived in Lafitte, and she waited seven years on the Section 8 waiting list before she was purged from the list after Hurricane Katrina. Ms. Lewis and her two children currently have no option for housing except a substandard apartment with intermittent utilities. Ms. Lewis is a member of STAND.
11. Plaintiff Talbert Haywood is reconstruction worker who is a long time resident of the Lower Ninth Ward, New Orleans, Louisiana. HANO’s delay in re-opening the HCVP voucher program pushed Mr. Haywood into homelessness and onto the street for the second time since Hurricane Katrina. Mr. Haywood is a founding member of STAND.
12. Plaintiff Merline Kimble is a homeowner who is a long term resident of Treme, New Orleans, Louisiana where she is raising her five grandchildren. She also rents space in her home to low-income displaced renters who are struggling to return to New Orleans

after post-hurricane displacement. She was displaced for almost a year after Katrina, and she is an active community worker in Treme advocating for the right to return. She risks losing her home without reliable rent, but she continues to rent to low income people because of her commitment to the right to return for all residents. Ms. Kimble is a member of STAND.

13. Plaintiff Tamar McFarlane is a community organizer with STAND. Ms. McFarlane lives in New Orleans, Louisiana.

14. Defendant Housing Authority of New Orleans ("HANO") is the New Orleans public housing agency whose mission is to promote safe, decent, sanitary, and affordable housing, economic opportunity and a suitable living environment free from discrimination through collaboration with the surrounding community, legal and social services agencies.

#### STATEMENT OF FACTS

15. On July 15, 2009, pursuant to the Louisiana Public Record Law, STAND, its members, and Ms. McFarlane (hereinafter "STAND Plaintiffs") requested the following documents from HANO:

- Detailed outline of HANO Commissioner Diane Johnson's job description, responsibilities, and duties;
- Diane Johnson's work plan and strategic goals for improving HANO management and services in 2008-2009;
- HANO's assessment and cost-benefit analysis of its management priorities before and after the appointment of Diane Johnson;
- HANO's assessment and cost benefit analysis for the re-opening of the Section 8 by the agreed upon November 2008 deadline;
- HANO's strategic improvement plan from July 2008;
- Karen Cato-Turner's quarterly reports for HANO's Strategic Improvement Plan, including the following time periods: July -Sept. 2008, October-December 2008, January - March 2009, and April- June 2009;

- HANO's current strategic plan and timeline for re-opening its Section 8 program;
- An itemized list of HANO's capital and operational budget for 2008-2009;
- An itemized list of HANO's total annual budget for 2009-2009;
- A list of all members appointed by Deborah Hernandez to complete random investigation on HANO's activities;
- The total amount of Housing Choice Vouchers that have been allocated to HANO for FY08-09 and the three previous fiscal years;
- The total number of Housing Choice Vouchers that have been administered by HANO since 2006;
- The total and categorized number of Housing Choice Vouchers that are actively in use;
- The cooperative endeavor agreement between HUD, HANO, and the City of New Orleans entered into on April 1, 2008;
- HANO's plan and timeline for the transition of HUD control back to local authorities.

16. The STAND Plaintiffs' July 15, 2009 request was made via certified mail and facsimile transmission. A copy of the letter making this request is attached hereto as Exhibit A.

17. On July 15, 2009, HANO acknowledged receipt of the STAND Plaintiffs' Public Records Request and indicated that the request would be forwarded to the appropriate HANO department(s). A copy of that letter is attached as Exhibit B.

18. The STAND Plaintiffs contacted HANO repeatedly by telephone to reiterate the importance of HANO's response to the outstanding request.

19. On July 22, 2009, the STAND Plaintiffs requested a meeting with the sole member of HANO's board, Ms. Diane Johnson, to discuss several issues, including HANO's failure to produce the requested records. A copy of that email is attached as Exhibit C.

20. More than five business days have passed since the STAND Plaintiffs submitted their request.

21. Despite repeated requests, the STAND Plaintiffs have not received the records responsive to its July 15, 2009 Public Records Request, nor have the STAND Plaintiffs received a written determination that the records are exempt from disclosure.
22. HANO has unreasonably and arbitrarily failed to respond to the STAND Plaintiffs' request for public records.
23. If the STAND Plaintiffs had received the records within the time provided by law, STAND could have used the documents to provide enhanced community oversight and advocacy with regard to HANO's administration of the Section 8 voucher program. For example, had the STAND Plaintiffs received the documents that would have shown HANO's plan for reopening the voucher list, STAND could have advocated for changes in implementation and oversight that would have prevented some of the widespread problems.
24. By unreasonably and arbitrarily blocked access to vital public records necessary for STAND and its members to provide effective oversight of HANO and advocacy concerning the Section 8 process, HANO caused actual damages to STAND and its members. For example, the STAND Plaintiffs were harmed by both the delay of the opening of the Section 8 waiting list and the delay in the ultimate release of the vouchers. They were harmed by implementation problems that blocked eligible residents from participating. And they were harmed by the stress from HANO's non-transparent, unpredictable, and unreliable administration of a program on which the most vulnerable residents in the New Orleans community rely for a fundamental need. Categories of particularly vulnerable residents faced particular harms:
  - a. Senior citizens and others on fixed incomes, like STAND Plaintiff Jackson, have been harmed because they continue to spend huge percentages of their fixed incomes on safe and affordable housing;
  - b. Mothers, like STAND Plaintiff Lewis, have been harmed because they have no choice but to subject their families to substandard housing;

- c. Reconstruction workers, like STAND Plaintiff Haywood, have been harmed, becoming homeless and losing steady work opportunities because they cannot afford stable housing; and
- d. Homeowners, like STAND Plaintiff Kimble, have been harmed because they cannot preserve their homes without the preservation of a stable low-income rental market across the city.

**CAUSE OF ACTION:  
VIOLATION OF THE LOUISIANA PUBLIC RECORDS LAW**

- 25. The right of access to public records is a fundamental right guaranteed by Article XII, Section 3 of the Louisiana Constitution of 1974.
- 26. By enacting the Public Records Law, La. R.S. 44.1, et seq., the Legislature sought to guarantee, in the most expansive and unrestricted manner possible, the right of the public to inspect and reproduce public records.
- 27. HANO violated the Louisiana Public Records Law, La. R. S. § 44.31 et seq., by failing to produce the records sought by the STAND Plaintiffs in their July 15, 2009 request, and by unreasonably or arbitrarily failing to respond to the request.
- 28. Pursuant to La. R. S. § 44.35, the STAND Plaintiffs are entitled to the issuance of a writ of mandamus, injunctive and declaratory relief, attorneys fees, costs, civil penalties, and actual damages.
- 29. La. R. S. 44.35(C) provides that any action brought to enforce the provisions of the Public Records Law “shall be tried by preference and in a summary manner.” The STAND Plaintiffs request a hearing at the earliest possible date.

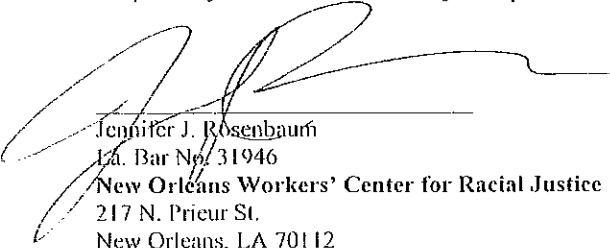
**PRAYER FOR RELIEF**

WHEREFORE, STAND prays that the Court:

- I. Issue a writ of mandamus directing HANO to immediately disclose the records requested or show cause why it should not be ordered to do so;
- II. Order HANO to show cause as to why it should not be preliminarily enjoined from withholding the requested documents;

- III. Order HANO to show cause why the records requested should not be declared to be public records that are not subject to any exemption from disclosure under the Public Records Law;
- IV. Declare that HANO violated the Public Records Act by unreasonably or arbitrarily failing to respond to the request;
- V. Award the STAND Plaintiffs attorneys' fees, costs, civil penalties, and actual damages; and,
- VI. Grant such further relief as is just and equitable.

Respectfully submitted this 29th day of September 2009,



Jennifer J. Rosenbaum  
La. Bar No. 31946  
New Orleans Workers' Center for Racial Justice  
217 N. Prieur St.  
New Orleans, LA 70112  
Telephone: (504) 309-5165  
jjrosenbaum@nowcrj.org  
*Counsel to the STAND Plaintiffs*

Sheriff please serve:

Housing Authority of New Orleans  
Custodian of Records  
c/o Karen Cato Turner  
4100 Touro St.  
New Orleans, LA 70122

**EXHIBIT A: STAND's July 15, 2009 request  
was made via certified mail and facsimile  
transmission.**

New Orleans Workers' Center for Racial Justice

217 N Prieur St. New Orleans, Louisiana 70112  
Phone: (504) 940-8389 Facsimile: (504) 309-5205

**STAND FOR DIGNITY**

July 15, 2009

VIA U.S. CERTIFIED MAIL, FACSIMILE, AND EMAIL

Director and/or Custodian of Records

Housing Authority of New Orleans  
c/o Diane Johnson, Board Chairperson  
4100 Touro Street  
New Orleans, LA 70122  
Email: [Diane.johnson@hud.gov](mailto:Diane.johnson@hud.gov)  
Phone: 504-670-3300, 973-622-7900 ex. 3102  
Fax: 973-645-2323, 504-286-8788

Dear Ms. Johnson:

This public records request is made on behalf of Tamar McFarlane and STAND, a grassroots membership project of the New Orleans Workers' Center for Racial Justice. Pursuant to the Louisiana Public Records Law, La. R.S. § 44:1 *et. seq.*, STAND requests the opportunity to inspect the following records in the possession, custody, or control of the Housing Authority of New Orleans:

- Detailed outline of HANO Commissioner Diane Johnson's job description, responsibilities and duties;
- Diane Johnson's work plan and strategic goals for improving HANO management and services in 2008-2009;
- HANO's assessment and cost-benefit analysis of its management priorities before and after the appointment of Diane Johnson;
- HANO's assessment and cost benefit analysis for the re-opening of the Section 8 program by the agreed upon November 2008 deadline;
- HANO's strategic improvement plan from July 2008;
- Karen Cato-Turner's quarterly reports for HANO's Strategic Improvement Plan, including the following time periods: July-Sept. 2008, October-December 2008, January- March 2009, and April- June 2009;
- HANO's current strategic plan and timeline for re-opening its Section 8 program;
- An itemized list of HANO's capital and operational budget for 2008-2009;

- An itemize list of HANO's total annual budget for 2008-2009;
- List of all members appointed by Deborah Hernandez to complete random investigation on HANO's activities;
- The total amount of Housing Choice Vouchers that have been allocated to HANO for FY08-09 and three previous fiscal years;
- The total number of Housing Choice Vouchers that have been administered by HANO since 2006;
- The total and categorized number of Housing Choice Vouchers that are actively in use;
- The cooperative endeavor agreement between HUD, HANO, and the City of New Orleans entered into on April 1, 2008;
- HANO's plan and timeline for the transition of HUD control back to local authorities.

We seek inspection of these records and any associated hard copy and electronic records, documents, spreadsheets, audiotapes, videotapes, and photographs. This request includes correspondence, memoranda, notes, e-mails, notices, telephone facsimiles, charts, tables, presentations, orders, filings, telephone or voice mail messages, and agendas. We also seek information from staff and budget meetings and/or discussions at which the topics covered in this request arose, including agendas, participant lists, minutes, transcripts, notes, and documents related to such meetings and/or discussions. Please provide all responsive records in the form or format in which they are regularly kept, whether hard copy, electronic, or otherwise.

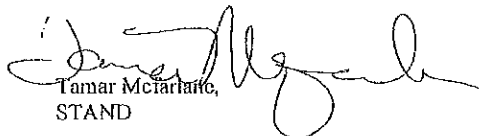
If HANO believes that any portion of any records requested above is exempt from disclosure, HANO must provide us with an index of those documents that adequately describes each withheld document or portion of a document, and that states the claimed exemption with sufficient specificity to permit a reasoned judgment as to whether the material is actually exempt from disclosure. If portions of any requested records are properly exempt from disclosure, please disclose any non-exempt portions of the requested records.

Pursuant to La. R.S. § 44.33, STAND asks that this information be available for inspection immediately and writing response sent to the STAND office within 3 days at the address on this letterhead. If HANO is unable to provide inspection of the requested information, please contact me, via Facsimile.

The New Orleans Workers' Center for Racial Justice is a nonprofit community organization seeking information on behalf of our low-income members concerning the operations of the Housing Authority of New Orleans. We therefore request that fees be waived or reduced pursuant to La. R.S. § 44:32 (C)(1)(a).

If you need clarification about this request, you may contact me at (504) 940-8389. Thank you for your prompt attention to this matter.

Sincerely,

  
Tamar McIarlane,  
STAND

## TRANSACTION REPORT

JUL/15/2009/WED 03:51 PM

## BROADCAST

#	DATE	START T.	RECEIVER	COM. TIME	PAGE	TYPE/NOTE	FILE
001	JUL/15	03:46PM	19736452323	0:00:46	3	MEMORY OK	SG3 2938
002		03:47PM	18567575373	0:00:35	3	MEMORY OK	SG3 2938
TOTAL				0:01:21	6		

## New Orleans Workers' Center for Racial Justice

217 N. Prieur Street  
New Orleans, LA 70112

Phone: (504) 881-6550  
Fax: (504) 309-5205  
Email: workerscenter@gmail.com

*Fax Cover Sheet*

Send to:	Director and Custodian of Records	From:	Tamar McFarlane
Attention:	Diane J. Johnson	Office location:	217 N. Prieur Street
Office location:	Bridgeview Bldg 2 <sup>nd</sup> Floor	Date:	July 15, 2009
Fax number:	973-645-2323; 856-757-5373	Phone number:	504-940-8389

URGENT   
 REPLY ASAP   
 PLEASE COMMENT   
 PLEASE REVIEW   
 FOR YOUR INFORMATION

TOTAL PAGES, INCLUDING COVER: 3

## Comments:

## DISCLAIMER

This Fax message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential. If you are not an intended recipient, you may not review, copy or distribute this message. If you

**EXHIBIT B: HANO's July 15, 2009**

**acknowledged receipt of STAND's Public**

**Records Request indicating that the request**

**would be forwarded to the appropriate HANO**

**department(s).**



July 15, 2009

*Via Facsimile and U.S. Mail  
(504) 309-3203*

Ms. Tamar McFarlane  
Stand for Dignity  
217 N. Prieur Street  
New Orleans, LA 70112

*Re: FOIA Request*

Dear Ms. McFarlane:

Your Public Records Request has been received in the Legal Department and will be forwarded to the appropriate department(s) for the document(s). Upon review and receipt of the requested documents, you will be notified. Please be aware that the copying fee is \$.25 per page.

If you have any questions, please do not hesitate to contact me at (504) 670-3388.

Sincerely,

Wayna E. Woods  
General Counsel

WEW:pat



LEGAL DEPARTMENT  
 FACSIMILE COVER SHEET

Date: 7/15/09

TO: Samar McFarlane

FAX: 504-309-5205

RE: FOIA Request

FROM: Wayne Woods

PHONE: 504-670-3300

Number of Pages (excluding cover): 1

Notes:

This facsimile transmission (and/or the documents accompanying it) contain(s) confidential information belonging to the sender which may also be privileged and which is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure or use of the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone to arrange for return of the documents.

**EXHIBIT C: STAND's July 22, 2009 request for a meeting with the sole member of HANO's board, Ms. Diane Johnson, to discuss several issues, including HANO's failure to produce the requested records.**



tamar mcfarlane <tamarmc@gmail.com>

## Meeting with Ms. Johnson

tamar mcfarlane <tamarmc@gmail.com>

Wed, Jul 22, 2009 at 6:43 PM

To: Wayne Woods <wwoods@hano.org>

Cc: diane.j.johnson@hud.gov, diane\_j.\_johnson@hud.gov

Bcc: "W. C. Johnson" <wcjohnson76@yahoo.com>, Ted quant <member2245@aol.com>

### New Orleans Workers' Center for Racial Justice

217 N. Prieur Street Phone: 504.940.8389

New Orleans, Louisiana 70113

### *STAND with Dignity*

July 22, 2009

VIA Email

ATT: Diane Johnson

Housing Authority of New Orleans

4100 Touro Street

New Orleans, LA 70122

Ph: 504-670-3335

Fax: 504-286-8788

We are writing today to request your immediate participation in a Public Meeting. We are strongly disappointed in your proposed closed meeting as the only option.

STAND has attempted to contact HANO's office for the last three months to address HANO's failure to make thousands of vouchers available to displaced and low-income families returning to New Orleans with no access to affordable housing. Mr. Woods you mentioned the need for HANO's staff to "decipher and frame the issue." We would like to refer you back to several correspondence letters sent to HANO, on March 28<sup>th</sup> 2009, April 21<sup>st</sup> 2009, May 18<sup>th</sup> 2009, May 29<sup>th</sup> 2009, and June 3<sup>rd</sup> 2009, that outline

and frame the issue.

On July 15, 2009, we visited HANO's office to directly request a public meeting with Diane Johnson, but was unjustly denied entrance and instructed to schedule a meeting by appointment. In response, we immediately contacted Mr. Wayne Wood and Karen Turner to schedule a public meeting. On July 17<sup>th</sup> STAND received Mr. Wayne Woods and Ms. Diane Johnson commitment, via email, to schedule and participates in a July public meeting. We urge HANO's one-woman board member, Diane Johnson, to work in collaboration with the community by agreeing to participate in a public meeting that is inclusive of residents directly impacted by HANO's policy.

STAND is requesting an open meeting with you, Diane Johnson. Please contact us via phone 504-940-8389 and email [tamarm@nowcrj.org](mailto:tamarm@nowcrj.org) to schedule that Public Meeting. We appreciate your timely response.

Respectfully,

STAND

On Tue, Jul 21, 2009 at 6:40 PM, Wayne Woods <[wwoods@hano.org](mailto:wwoods@hano.org)> wrote:

[Quoted text hidden]

[Quoted text hidden]

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CIVIL DISTRICT COURT  
PARISH OF ORLEANS  
STATE OF LOUISIANA

STAND WITH DIGNITY on behalf of itself )  
and its members including JOHNNYE )  
JACKSON, AISHA LEWIS, )  
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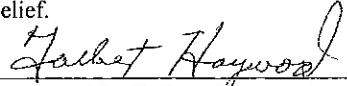
STATE OF LOUISIANA

PARISH OF ORLEANS

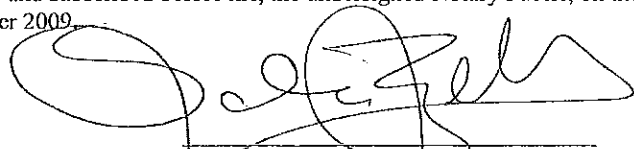
Before me, the undersigned Notary Public, personally came and appeared:

**Mr. Talbert Haywood**

who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

  
\_\_\_\_\_  
Mr. Talbert Haywood

Sworn to and subscribed before me, the undersigned Notary Public, on the 27<sup>th</sup> day of September 2009.

  
\_\_\_\_\_  
Notary Public  
La. Bar Roll No. 707

**Paul A. Bello, Notary Public**  
**Commission # 707**  
**State of Louisiana**  
**Parish of Orleans**  
**Commissioned For Life**



CIVIL DISTRICT COURT  
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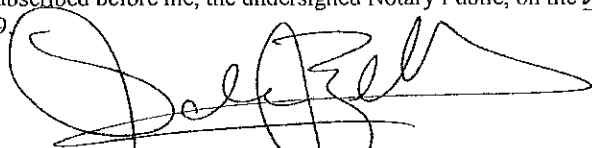
Before me, the undersigned Notary Public, personally came and appeared:

**Tamar McFarlane, individually and on behalf of STAND WITH DIGNITY, appearing  
on behalf of itself and its members**

who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

  
Tamar McFarlane

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.



Notary Public  
La. Bar Roll No. 707

**Paul A. Bello, Notary Public  
Commission # 707  
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Before me, the undersigned Notary Public, personally came and appeared:

**Ms. Johnnye Jackson**

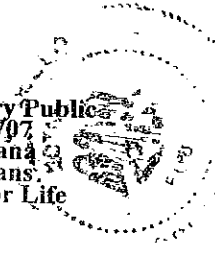
who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

*Ms. Johnnye Jackson*  
Ms. Johnnye Jackson

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.

*Paul A. Bello*  
Notary Public  
La. Bar Roll No. 707

**Paul A. Bello, Notary Public**  
Commission # **707**  
State of Louisiana  
Parish of Orleans  
Commissioned For Life



CIVIL DISTRICT COURT  
PARISH OF ORLEANS  
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STAND WITH DIGNITY on behalf of itself )  
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Before me, the undersigned Notary Public, personally came and appeared:

**Ms. Merline Kimble**

who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

*Merline Kimble*

Ms. Merline Kimble

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.

*Paul A. Bello*

Notary Public  
La. Bar Roll No. 707  
**Paul A. Bello, Notary Public**  
Commission # 707  
State of Louisiana  
Parish of Orleans  
Commissioned For Life



CIVIL DISTRICT COURT  
PARISH OF ORLEANS  
STATE OF LOUISIANA

STAND WITH DIGNITY on behalf of itself )  
and its members including JOHNNYE )  
JACKSON, AISHA LEWIS, )  
TALBERT HAYWOOD, )  
and MERLINE KIMBLE, and )  
TAMAR MCFARLANE, )  
Plaintiffs, )  
vs. )  
HOUSING AUTHORITY )  
OF NEW ORLEANS, )  
Defendant. )

Civil Action No. \_\_\_\_\_

VERIFICATION

STATE OF LOUISIANA

PARISH OF ORLEANS

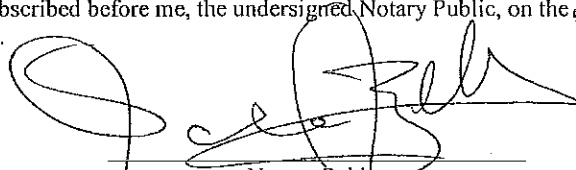
Before me, the undersigned Notary Public, personally came and appeared:

**Ms. Aisha Lewis**

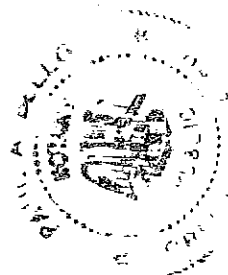
who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

  
Ms. Aisha Lewis

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.

  
Notary Public  
La. Bar Roll No. 707

**Paul A. Bello, Notary Public**  
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CIVIL DISTRICT COURT  
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Defendant. )

Civil Action No. \_\_\_\_\_

VERIFICATION

STATE OF LOUISIANA

PARISH OF ORLEANS

Before me, the undersigned Notary Public, personally came and appeared:

Mr. Talbert Haywood

who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

*Talbert Haywood*  
\_\_\_\_\_  
Mr. Talbert Haywood

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.

*Paul A. Bello*  
\_\_\_\_\_  
Notary Public  
La. Bar Roll No. 707

Paul A. Bello, Notary Public  
Commission # 707  
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CIVIL DISTRICT COURT  
PARISH OF ORLEANS  
STATE OF LOUISIANA

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vs. ) Civil Action No. \_\_\_\_\_  
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Defendant. )

VERIFICATION


STATE OF LOUISIANA

PARISH OF ORLEANS

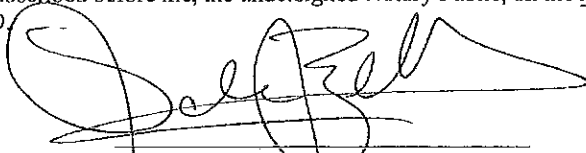
Before me, the undersigned Notary Public, personally came and appeared:

**Tamar McFarlane, individually and on behalf of STAND WITH DIGNITY, appearing  
on behalf of itself and its members**

who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

  
Tamar McFarlane

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.



Notary Public  
La. Bar Roll No. 707

**Paul A. Bello, Notary Public  
Commission # 707  
State of Louisiana  
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CIVIL DISTRICT COURT  
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STATE OF LOUISIANA

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)  
HOUSING AUTHORITY )  
OF NEW ORLEANS, )  
Defendant. )

Civil Action No. \_\_\_\_\_

VERIFICATION

STATE OF LOUISIANA

PARISH OF ORLEANS

Before me, the undersigned Notary Public, personally came and appeared:

**Ms. Johnnye Jackson**

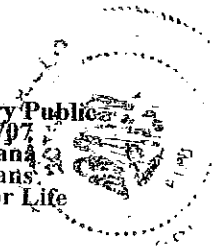
who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

*Ms. Johnnye Jackson*  
Ms. Johnnye Jackson

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.

*Paul A. Bello*  
\_\_\_\_\_  
Notary Public  
La. Bar Roll No. 707

**Paul A. Bello, Notary Public**  
Commission # **707**  
State of Louisiana  
Parish of Orleans  
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CIVIL DISTRICT COURT  
PARISH OF ORLEANS  
STATE OF LOUISIANA

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HOUSING AUTHORITY )  
OF NEW ORLEANS, )  
Defendant. )

Civil Action No. \_\_\_\_\_

VERIFICATION

STATE OF LOUISIANA

PARISH OF ORLEANS

Before me, the undersigned Notary Public, personally came and appeared:

Ms. Merline Kimble

who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

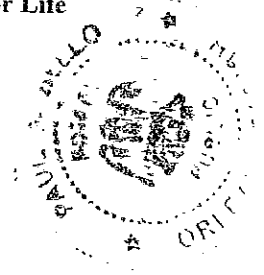
*Merline Kimble*

Ms. Merline Kimble

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.

*Paul A. Bello*

Notary Public  
La. Bar Roll No. 707  
Paul A. Bello, Notary Public  
Commission # 707  
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CIVIL DISTRICT COURT  
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Civil Action No. \_\_\_\_\_

VERIFICATION

STATE OF LOUISIANA

PARISH OF ORLEANS

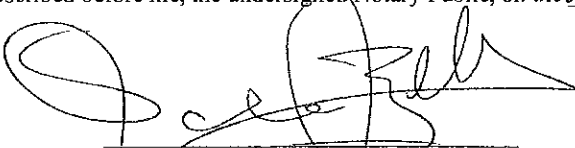
Before me, the undersigned Notary Public, personally came and appeared:

**Ms. Aisha Lewis**

who, after being duly sworn, did depose and say that she is a plaintiff in the above captioned civil action, that she has read the foregoing Petition for Writ of Mandamus and Injunctive and Declaratory Relief, and that all of the allegations contained therein are true and correct to the best of her knowledge and belief.

  
Ms. Aisha Lewis

Sworn to and subscribed before me, the undersigned Notary Public, on the 29<sup>th</sup> day of September 2009.

  
Notary Public  
La. Bar Roll No. 707

**Paul A. Bello, Notary Public  
Commission # 707  
State of Louisiana  
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