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February 23, 2012

**BY EMAIL**

Kevin J. Plunkett, Esq.  
Deputy County Executive  
Westchester County  
148 Martine Avenue, 9th Floor  
White Plains, NY 10601

**United States *ex rel* Anti-Discrimination Center of Metro New York, Inc. v.  
Westchester County, New York (No. 06 Civ. 2860 (DLC))**

Dear Mr. Plunkett:

As we have discussed previously, in order for Westchester County to fulfill its obligations under the Stipulation and Order of Settlement and Dismissal (“Settlement”), the County must develop a clear, thorough, innovative financing strategy. That strategy must be described in detail as part of the County’s Implementation Plan (“IP”). The Monitor’s First Biennial Assessment recognized that the County has made some laudable efforts to increase the effectiveness of its available funds, but emphasized that “[m]uch more vigorous and creative strategizing is needed,” and that “[m]erely spending the remaining unobligated funds without an ongoing campaign to leverage those funds, including through active use of the recently established revolving loan fund, and to entice other funding sources will not be considered good-faith compliance with the terms of the Settlement.” First Biennial Assessment at 20. The Monitor also noted that “once the financing strategy has been finalized, the IP will be substantially complete.” *Id.* at 13.

Accordingly, the Monitor requests that the County submit a written financing strategy on or before March 23, 2012. The strategy may draw upon the relevant portions of the County’s August 2010 draft IP and the County’s quarterly reporting concerning its financing-related efforts, and should address, at a minimum, the following topics:

- How the County intends to meet its obligations under the Settlement, including ensuring the development of at least 750 affordable housing units under paragraph 7 of the Settlement, within the available budget.

Kevin J. Plunkett, Esq.

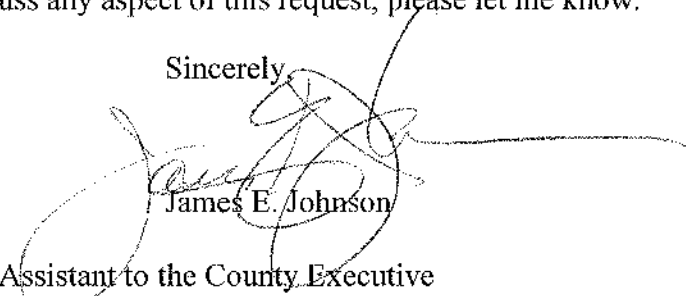
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- The County's current and anticipated use of revolving loan mechanisms for available CDBG funds, including the use of the revolving loan fund described in the County's Funding Advisory No. 6 and approved by the Monitor on October 25, 2011.
- The County's current and anticipated use of other mechanisms to leverage funds – e.g., federal and state financing sources, private funding sources (including foundations), foreclosure purchases, employer-assisted housing and inclusionary zoning.
- Projected annual budgeting through 2016 for use of the available County and CDBG funds in furtherance of the County's obligations under the Settlement.

If you would like to discuss any aspect of this request, please let me know.

Sincerely,



James E. Johnson

cc: Mary J. Mahon, Special Assistant to the County Executive  
Glenda Fussá, Deputy Regional Counsel, New York Office, HUD