

ANTI-DISCRIMINATION CENTER, INC.

“ONE COMMUNITY, NO EXCLUSION”

May 21, 2019

Hon. Katharine H. Parker
United States Magistrate Judge
500 Pearl Street, Room 750
New York, New York 10007

Re: Letter-motion re discovery: Application pursuant to Protective Order, ¶ 17
Noel and Senat v. City of New York, 15-CV-5236 (LTS) (KHP)

Your Honor:

Pursuant to paragraph 17 of the Protective Order in this case ([ECF 82](#)), plaintiffs herewith apply for removal of any designation of confidentiality from any portion of the reports prepared on behalf of plaintiffs by Professor Andrew Beveridge and dated April 1, 2019 and May 10, 2019, respectively,¹ *with an effective date for such an order being June 27, 2019* (see Part III for practical impact of the deferred date). Defendant cannot demonstrate “good cause” pursuant to FRCP 26(c) to keep the reports secret; the factors cited by the Court in its July 5, 2017 Opinion and Order ([ECF 148](#)) are not applicable. Plaintiffs request that the Court accept this four-page letter.

I. Introduction

Plaintiffs argue that defendant’s outsider-restriction policy in affordable housing lotteries operates to deny on the basis of race a level playing field to New Yorkers seeking affordable housing.² On April 1, 2019, Professor Beveridge’s report, speaking to that and other issues, was served on defendant. Defendant’s opposing expert, Professor Bernard Siskin, will serve his report on June 27, 2019.

Turning to the element of disparate impact where a defendant seeks to justify its policy notwithstanding its racial impact, defendant has had its expert, Professor Edward Goetz, prepare a Feb. 13, 2019 report seeking to link the outsider-restriction policy with prevention of displacement and the fear of displacement. It is plaintiffs’ position that defendant is unable to support with

¹ In respect to the April 1st report, the report and its exhibits are annexed hereto as Exhibits 1-13; the sources and methods appendix and its exhibits as Exhibit 14; and the supplement (consisting of Professor Beveridge’s June 2017 report and its exhibits) as Exhibit 15. Plaintiffs make separate applications in respect to the report, the appendix, and the supplement. The May 10th report and its exhibits are annexed hereto as Exhibits 16-25. Plaintiffs make separate application in response to this report as well.

² Note that disparate impact is impermissible at any stage. See, e.g., *Winfield v. City of New York*, 2016 WL 6208564, at *4 (S.D.N.Y. Oct. 24, 2016) (distinguishing as an “injury” the “denial of the opportunity to compete on an equal footing for fair housing in their desired neighborhoods, rather than from the failure to achieve a successful result in any particular lottery,” and underscoring that “[t]his distinction was recognized by the Second Circuit in *Comer*”).

evidence any fit between the policy and the asserted goal. The lack of fit, plaintiffs assert, is evidenced, *inter alia*, by various lottery-related data. On May 10, 2019, Professor Beveridge submitted a report in rebuttal to the Goetz report opining on these issues.

Substantial portions of both reports come within the ambit of the Protective Order in this case ([ECF 82](#)) because the Protective Order, initially treats any analyses that come to be “derived from or obtained about” lottery applicants and lottery outcomes as “confidential, for attorney’s eyes only”. [ECF 82](#), Appendix A, ¶ 4.³

The Protective Order, however, makes clear that it was “entered into without prejudice to the right of either party to seek relief from, or modification of, [the] Order or any provisions thereof by properly noticed motion to the Court *or to challenge any designation of confidentiality as inappropriate under the Federal Rules of Civil Procedure or other applicable law.*” [ECF 82](#), ¶ 17 (emphasis supplied).

II. It is defendant’s burden to show why FRCP 26(c) should protect the reports, but it cannot do so

It is not the case that a receiving party has any burden whatsoever to show that release from secrecy is “needed.” On the contrary, it is “well established” that the “party seeking a protective order [under Rule 26(c)] has the burden of showing that good cause exists for issuance of that order”; in “the absence of such a protective order, ‘parties to a law suit may disseminate materials obtained during discovery as they see fit.’” *Schiller v. City of New York*, 2007 WL 136149, at *2 (S.D.N.Y. Jan. 19, 2007) (alteration in original) (emphasis added) (citations omitted). See also *Kelly v. City of New York*, 2003 WL 548400, at *4 (S.D.N.Y. Feb. 24, 2003) (holding that, absent good cause, discovery materials should not receive judicial protection from disclosure).

There can be no “good cause” here. As will be evident from Your Honor’s review, there are no personally identifiable data in the reports, and there is no otherwise “sensitive” data. On the contrary, the data concern the operation of a large public program that allocates affordable housing, a scarce and important resource. Defendant has no “privacy” interest in these data. *Cf. United States v. Amodeo*, 71 F.3d 1044, 1051 (2d Cir. 1995) (“In determining the weight to be accorded an assertion of a right of privacy, courts should first consider the degree to which the subject matter is traditionally considered private rather than public.) Here, the subject matter is entirely public: the operation of the City’s affordable housing lottery system. For weighing any privacy interest, *Amodeo* placed in one basket the following examples: “Financial records of a

³ There were no concrete analyses before the Court when the Protective Order was entered in February 2017. In denying plaintiffs’ request at the time to distinguish in advance between aggregated data and underlying data, you specifically explained that “I don’t think it’s appropriate now to guess what kind of aggregated information” there will be; that “right at this point in time, I do not know what the aggregate data is”; that “I think that without knowing the nature of what it is, that it’s not appropriate to do a blanket exclusion to allow disclosure”; and that “I don’t think it’s appropriate at this stage to just say from a blanket position that plaintiff should be able to disclose data analyses.” See Transcript of Feb. 10, 2017 Court Conference ([ECF 85](#)), at 18:4-6, 19:18-20, and 20:4-10. Your Honor stated at a later conference that, in entering the order, ““I was concerned about personally identifying information and the like.” See Transcript of June 5, 2017 Court Conference ([ECF 162](#)), at 15:19-21.

wholly owned business, family affairs, illnesses, embarrassing conduct with no public ramifications, and similar matters.” *Id.* These were juxtaposed to “conduct affecting a substantial portion of the public,” *id.*, which, again, is precisely that the reports in question deal with.

We can certainly understand that, from the point of view of politics and public relations, defendant would want to enlist the Court to keep the Beveridge reports secret. But the fact that a document is inculpatory, or “bad” for a party on the merits, does not render it sensitive. “Without a concrete showing of harm that would result from public disclosure, the mere fact that the defendants wish to shield from public view [the documents] does not justify a protective order” because if “a party could obtain a protective order based merely on an assertion that it would prefer to keep a document from public view, Rule 26(c)’s ‘good cause’ requirement would be meaningless.” *Schiller*, 2007 WL 136149, at *8.

Further, this case, unlike *In re Terrorist Attacks on Sept. 11, 2001*, 454 F. Supp. 2d 220, 222 (S.D.N.Y. 2006), is not “multidistrict litigation [that] amounts to one of the largest private lawsuits in United States history.” *Id.*, 454 F. Supp. 2d at 223. As such, the Court must look to the normal standard: whether the party seeking the protection of FRCP 26(c) has demonstrated that “clearly defined, specific and serious injury” that would ensue from denying a protective order. *Id.*, 454 F. Supp. 2d at 222 (citation omitted).

III. Premises of the July 7, 2017 Opinion and Order

None of the principal factors that the Court cited in its Opinion and Order of July 5, 2017 ([ECF 148](#)) are applicable, as of the proposed effective date of an order removing confidentiality:

(1) Defendant will have served its opposition report to Professor Beveridge’s April 1st report by June 27th. As such, it will have the opportunity to respond contemporaneously to any public disclosure should it desire to. *Cf.* [ECF 148](#), at 12 (emphasis added) (reasoning that defendant “has a serious concern about data being analyzed incorrectly and being placed in the public sphere *without having an opportunity to contemporaneously refute plaintiffs’ analysis*”).

(2) Lifting Court-imposed secrecy at the requested time is entirely consistent with the “spirit and objectives of the Court’s phased discovery plan,” *id.*, and does not require defendant to do anything other than what it is currently engaged in doing (preparing an opposition report). *Cf. id.* (stating that the Court “[a]t this juncture in discovery, does not see any legitimate reason for the City to focus its efforts on preparing a rebuttal to Plaintiffs’ preliminary analyses.”).

(3) Settlement efforts have been tried and failed (multiple times); there is no prospect that this matter will settle. *Cf.* [ECF 148](#), at 7 (stating that “a protective order may facilitate settlement”).

(4) The analyses contained in the report are at the center of the case. *Cf. id.*, at 11 (stating that “Many documents exchanged in discovery, even if relevant, may never be admitted in trial or in connection with a dispositive motion”). We can assure the Court that, most assuredly, it is plaintiffs’ full intention that Professor Beveridge’s reports and/or the analyses contained therein will come before the trial court in connection, *inter alia*, with the motion papers that plaintiffs will

file seeking summary judgment.⁴

IV. Placing non-protected discovery materials in the public domain

As it happens, defendant itself has chosen to share lottery information with media outlets. Take a look, for example, at an article from “DNAInfo” that was published in November 2016 (during the pendency of this lawsuit).⁵ The tables accompanying the article – *for which the data source in all cases was HPD* – show winners of affordable housing by age, household size, income range, and race.

So any complaint that defendant may have about public disclosure is actually a complaint about not having a monopoly about which aggregated data are put out in what form. But even if defendant had not done that, it is entirely proper – most especially in the context of litigation of critical issues relating to the public interest – for a party to educate the public with respect to discovery materials that, as is the case here, were properly obtained for the primary purpose of prosecuting the litigation. That is true regardless of what one’s personal feelings about the practice may be. *See Schiller*, 2007 WL 136149, at *2 (citation omitted) (holding that in the absence of a protective order “parties to a law suit may disseminate materials obtained during discovery as they see fit.”).

To put it another way, the interest of a governmental entity in a democratic society is supposed to be in facilitating robust public debate of public policy issues, not trying to squelch such debate.

Respectfully submitted,

Craig Gurian

Craig Gurian
Co-counsel for plaintiffs

⁴ At that time, plaintiffs will make application to Judge Swain to have the reports or their equivalents treated as judicial documents. So that there is no misunderstanding, this application is not based on, and does not seek a ruling in respect to, “judicial documents.” The current applications are limited to the fact that defendant cannot meet its burden pursuant to FRCP 26(c).

⁵ The article, “City’s Affordable Housing Lotteries Favor Young Single People, Stats Show,” is annexed hereto as Exhibit 26.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHAUNA NOEL and EMMANUELLA SENAT,

Plaintiffs,

-against-

15-CV-5236 (LTS) (KHP)

CITY OF NEW YORK,

Defendant.

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EXPERT REPORT OF PROFESSOR ANDREW A. BEVERIDGE

April 1, 2019

A. Qualifications, experience, compensation

1. I am a Professor of Sociology at Queens College and the Graduate Center of the City University of New York, and served as Chair of the Queens College Sociology Department from 2006 to 2018. My primary responsibilities at Queens College and the Graduate Center are teaching statistics and research methods at the graduate and undergraduate levels, and conducting quantitative, statistically-based social research. I have a Ph.D. in Sociology and B.A. in Economics from Yale University. I have been a professor since 1973, first at Columbia University until 1981, and then at Queens College and the Graduate Center of the City University of New York.

2. My areas of expertise include demography and the statistical and quantitative analysis of social science datasets, most particularly including Census data, survey data and administrative records. I am an expert in the application of Geographical Information Systems (GIS) technology to the analysis of social patterns. I regularly publish results and analyses in professional journals and peer-reviewed books. Some of my analyses have served as the bases for articles in the *New York Times*, where I have served as a demographic consultant since 1993, through an agreement between Social Explorer, Inc. and the *New York Times*.

3. I am the co-founder and CEO of Social Explorer Inc., a website that provides demographic and other social data in a visual form. The site and related projects have won six awards and had over one million users in the last year. The site is distributed to libraries by Oxford University Press and is licensed to Pearson Publishing across all of higher education for the development of curricular materials. I have also served as a consultant to a number of public and private entities, where I provide services related to demographic analysis.

4. I have frequently provided expert opinions and testimony in demographic and

statistical analysis. These include the following (and encompass all of the cases in the last four years where I have given testimony at trial or at deposition): *Adriann Borum, et al., v. Brentwood Village, LLC, et al.*, No. 1:16-Cv-01723-Rc (D.C.); *Residential Opportunities, Inc. v. Clinton Terrace L.P.*, No. 7:16-cv-9273; (S.D.N.Y.) (Report, 2017); *Akagi v. Turin Housing Development Fund, Co.*, No. 1:13-cv-5258 (S.D.N.Y.) (Report, Deposition, Rebuttal Report, 2016–present); *Aref v. Sessions*, No. 1:10-cv-539 (D.D.C.) (Report, Deposition, 2013–present); *New York v. Evans Bancorp, Inc.*, No. 1:14-cv-726 (W.D.N.Y.) (Report, 2014–2015); *United States v. City of New Orleans*, No. 2:12-cv-1924 (E.D. La.) (Report, Deposition, 2013–2014); *City of Joliet v. Mid-City Nat'l Bank of Chicago*, No. 1:05-cv-6746 (N.D. Ill.) (Report, Deposition, Trial Testimony, 2012–2013); *United States v. St. Bernard Parish*, No. 2:12-cv-321 (E.D. La.) (Report, 2013–2014); *Favors v. Cuomo*, No. 1:11-cv-5632 (E.D.N.Y.) (Hearing Testimony, 2012); *Rivera v. Incorporated Village of Farmingdale*, No. 2:06-cv-2613 (E.D.N.Y.) (Report, Deposition, 2009–2014); *Aguilar v. Immigration and Customs Enforcement Div. of the U.S. Dept. of Homeland Security*, No. 1:07-cv-8224 (S.D.N.Y.) (Report, Rebuttal Report, Deposition, 2010–2013). A virtually complete list of cases and other matters in which I have provided opinions, as well as a list of publications, are listed in my curriculum vitae, attached hereto as Exhibit 1.

5. I am being compensated at the rate of ^[Redacted] hour for my work in this case; I am also being reimbursed for expenses, including the expenses for payment of members of my team.

B. Prior report

6. I previously submitted a declaration in this matter, dated June 1, 2017. The findings and opinions expressed in that declaration remain pertinent to the issues in this case. That declaration and the exhibits thereto is submitted separately as a supplement to this report.

C. Introduction and summary of findings

7. Defendant has had and continues to have rules (adopted and enforced by HPD, the Department of Housing Preservation and Development, and by HDC, the New York City Housing Development Corporation (“the agencies”)) that govern the award of housing units in defendant-administered lotteries for development or preservation projects where some or all of the units are within various levels of what defendant considers “affordable.” The eligibility criteria for some units makes them affordable, for example, to households (“HHs”) with an annual household income up to 60 or 80 percent of Area Median Income (“AMI”). Other units are “affordable” at a different level: perhaps 130 or even 165 percent of AMI.

8. The case and this report have to do with that portion of affordable housing units that are distributed by what is referred to as a housing lottery for initial rent-up. It is not concerned with units that are awarded through means other than the lottery (for example, units that are awarded by agency referral or with units that have been awarded as open market, the latter being a process that is supposed to be activated, on agency approval, only when one or more unit types have not been able to be filled in the lottery). It also puts to the side applicant HHs who, at application, are not New York City residents, and the small number of units awarded through the lottery to non- New York City residents.¹

9. The units in a project anticipated to be “lotteried” off are advertised to the public, including on “Housing Connect,” defendant’s online portal for advertising lotteries and accepting applications for them. (“Housing Connect” also refers to the database in which information

¹ In standard lotteries, New York City applicant HHs have a general preference over non- New York City applicant HHs. Unless otherwise specified, references to “all HHs,” “all units” or to “all” of a certain type or category of HH or unit are to be understood as terms that do *not* encompass non- New York City applicant HHs, nor units awarded to non- New York City residents. Residents of places outside of New York City accounted fo

[Redacted]

provided by applicant HHs in their applications is stored.)

10. Within a project’s lottery, there are, in the overwhelming percentage of lotteries, multiple “unit types” that are, at least initially, available to be competed for. Each unit type in a lottery is characterized by a unique combination of number of bedrooms, a monthly rent, a minimum income, and a range of permissible HH sizes, with the maximum permissible HH income generally varying by each permissible HH size. Each unit type is also associated with a particular AMI level of household income.

11. As I understand it, there is no “pre-qualification” or “qualification” process at the entrant stage. An applicant HH who wishes to do so is permitted to do so, so long as required information is provided.²

12. Neither HPD nor HDC make any initial threshold judgment about the qualifications of an applicant HH.³ In some respects, the process at this point is unremarkable: those who have wanted to apply have applied; once the lottery application process has ended, the agencies assign random sequence numbers to each application to determine the order in which a developer’s marketing agent is obliged to review them; and several pieces of data about applicant HHs, including, notably, the applicant HH’s self-reported annual HH income and HH-size, are made available to the marketing agent.

13. [Redacted]

²

[Redacted]

³

[Redacted]

[Redacted]

14. [Redacted] are a number of set-aside and preference rules, including rules that provide for priority being given for up to 50 percent of units anticipated to be lotteried⁴ off to those applicant HHs who live in the community district where the development is located.⁵

15. I was asked for this report to examine data from defendant's affordable housing lotteries to determine whether the community preference policy operates to create discriminatory effects against one or more racial or ethnic groups. I was also asked to determine whether these effects are reflective of a pattern that perpetuates segregation more (and allows integration less) than what would exist without the policy. I was also asked to opine on the extent to which applicant households choose to limit or do not choose to limit themselves to lotteries for affordable housing opportunities within their own community district. Finally, I was asked to opine on the scope of residential segregation in New York City.

16. For the purposes of this report and its exhibits, where I use the term African-American or Black, I am referring to the Census group "non-Hispanic Black"; when I use the term White, I am referring to the Census group "non-Hispanic White"; when I use the term Asian, I am referring to the Census group "non-Hispanic Asian"; and when I use the term Latino or Hispanic, I am referring to the Census group "Hispanics of any race."

17. The updated universe of projects that I analyzed consists of 168 of the 185 rental lotteries where defendant had "reconciled" the results between and among multiple types of

⁴ There are some circumstances where the percentage of lotteried units that go to applicant HHs living in the community district can be larger or smaller than 50 percent, but 50 percent is the norm.

⁵ In a small percentage of cases, the preference is expanded to cover not only those who live in the community district where the project is located, but also those who live in one or more nearby community districts.

defendant's data.⁶ These projects are listed by their Housing Connect ("HC") Project Identification Number in Exhibit 2. Lotteries from among this group had application deadlines for applicant households as early as August 2012 and as late as February 2017; full "lease-up" (that is, the moment at which the award of all of a project's lottery units for initial occupancy was completed) occurred between October 2012 and July 31, 2018.

18. In the aggregate, the 168 rental lotteries accounted for awards of ^c[Redacted] affordable housing units through the lottery ("lotteried units").⁷

19. There were, in total, more than [Redacted] lottery applications for these units from more than [Redacted] unique applicant HHs.

20. The reconciled rental lotteries that I did not analyze come in two categories: (a) 100 percent community preference lotteries; and (b) 15 projects, where only one unit or two units were lotteried off (these 15 lotteries awarded [Redacted] units in the aggregate). All of these projects are also identified in Exhibit 2. Each project in the 15-lottery group had been advertised as having community preference applicable, [Redacted]

21. My analyses included identification of lotteries, units types, unit types awarded, and applicant HHs within seven community district preference area typologies ("CD typologies")

⁶ In brief, the purpose of reconciliation was to confirm the accuracy of defendant's records as to which applicant HHs were awarded lotteried units.

[Redacted]
Decisions as to how to reconcile and what the reconciliation results should be in each particular case were made by defendant. Further reference to the reconciliation process is made in Section XIII of the Sources and Methodology Appendix submitted herewith.

⁷ As a reminder, I note that references to units and to applicant HHs (for example, in paragraphs 18 and 19) are always excluding non- New York City applicant HHs and units awarded to non- New York City HHs. Note, also, that defendant did not provide equivalent HH information on those who received units *outside* of the lottery process.

that I based on 2013-17 5-year American Community Survey (“ACS”) population data:⁸ majority White, majority Black, majority Asian, majority Hispanic, plurality White, plurality Black, and plurality Hispanic.

22. A list of the HC Projects, the number of units awarded through the lottery for each such project, the project’s CD typology, and the demographic composition of the project’s CD preference area, is reported in Exhibit 3. Racial and Hispanic composition for the lotteries in each CD typology, along with the number of lotteries in each typology, is reported in Exhibit 4.⁹

23. [Redacted]

24. [Redacted]

⁸ 2013-17 ACS 5-year data comprises the most recent 5-year data available (data from 2013 to 2017). I was able to aggregate up from the Census block level to the community district level using a map that provided information on the location of every Census block in a community district (CD). The map is available online from the “Bytes of the Big Apple” database from the New York City Department of City Planning at <https://www1.nyc.gov/site/planning/data-maps/open-data/districts-download-metadata.page>. A few blocks (those in parks and other areas with little or no population) were not assigned to a community district. The information from the ACS data was disaggregated to the block level based upon the percent of the block group population in each block, and then aggregated up to the CD. This is simply population weighting of block groups to blocks, and makes it possible to have reasonable estimates of population.

⁹ To make it possible to have reliable estimate of the composition of each typology based upon the number of units awarded, each CD or CD preference area that had one or more awardees was weighted based upon the total number of awardees in that CD or CD preference area. Thus, the composition of each typology best reflects that experienced by the awardees.

[Redacted]

25. [Redacted]

26. [Redacted]

27. [Redacted]

¹⁰ [Redacted]

¹¹).

28. [Redacted]

(Apparently-eligible HHs are applicant HHs whose HH size and income, as self-reported and stored in the HC database, met the income- and HH-size requirements for at least one unit-type in a lottery, as those requirements are set forth in various of defendant’s data.)¹²

¹⁰ Applicant HHs who are “insiders” (that is, who reside in the CD preference area). There is a small subset of such insiders who, for the purpose of the analyses I have performed, are treated as non-beneficiaries. See discussion at 11-12, ¶¶ 37-40.

¹¹ Applicant HHs for a lottery who reside in New York City outside of the community district preference area (“outsiders”) and a small subset of insiders who, for the purposes of the analyses I have performed, are treated as non-beneficiaries. See discussion at 11-12, ¶¶ 37-40.

¹² My testing for apparently eligible HHs included that portion of applicant HHs self-reporting the availability of a housing subsidy who: (a) are not disqualified based on reporting more income than the

29. [Redacted]

30. [Redacted]

31. [Redacted]

32. [Redacted] hypothesis that New Yorkers are always or mostly interested in remaining in their existing community district [Redacted]

33. And, finally, as has long been the case, New York City continues to have high levels of segregation, most especially between Black and White New Yorkers.

maximum income permitted for the unit type or types for which they are HH-size eligible; or (b) are not already eligible based on their HH income compared with the relevant unit types' requirements for minimum and maximum income. I made the determination of apparent eligibility for those applicant HHs who have reported the availability of a subsidy and who: (a) have HH income lower than the minimum income for the relevant unit types; and (b) by the operation of subsidy rules, are nonetheless deemed to be able to afford one or more of the relevant unit types (unit types which permit the applicant HH's HH-size).

D. Sources and methodology

34. With scant exception, the data I used were defendant's data provided to plaintiffs in discovery.¹³ [Redacted]

14

[Redacted]

35. Additional information about sources and methodology is contained in the body of this report and in the Sources and Methodology Appendix submitted herewith.

E. [Redacted]

36. It is at the lottery entrance stage that the agencies identify applicant HHs as living in the CD preference area or not, and, accordingly, make available to developers an initial log of

¹³ And as to the few exceptions, the data are publicly available to defendant, as noted where applicable.

¹⁴ The Housing Connect data were supplied to plaintiffs' counsel [Redacted]. The database was an exact copy except that some fields were redacted due to a variety of defendant concerns.

lottery applicants subject to lottery sequencing rules (most pertinently, applicant HHs living in the CD preference area are to be processed before any applicant HH resident in New York City who lives outside of the CD preference area¹⁵ until the 50 percent CD preference has been filled).

37. I first explored the extent to which the odds of being awarded a unit differed as between those applicant HHs who could compete for units that were ultimately awarded on the basis of the HH residing in the community district (CP beneficiary units) versus those applicant HHs who could compete for units that were ultimately awarded independent of community district residence (non-beneficiary units).

38. [Redacted]

39. [Redacted] ¹⁶ [Redacted]

17

[Redacted]

¹⁵ And who does not list a HH member with a mobility disability or hearing or visual disability.

¹⁶ Except where otherwise specified, reference to “status sheets” means the status sheet as reconciled by the reconciliation process, and encompasses the Access database’s equivalent information.

¹⁷ A marketing agent, as alluded to earlier, is a representative of, and works for, the project’s developer. Applicant HHs only come to the attention of the agencies if: (a) the marketing agent submits them for the agency to approve an award of a unit; (b) the applicant HH is appealing a determination that had been made at the developer level; or (c) the applicant HH files a complaint.

[Redacted]

40. [Redacted]

41. [Redacted]

.¹⁸ [Redacted]

.¹⁹ [Redacted]

42. [Redacted]

18 [Redacted]

19 [Redacted]

[Redacted]

43. [Redacted]

44. [Redacted]

45. [Redacted]

46. [Redacted]

,²⁰ [Redacted]

²⁰ The counts of applicant HHs by typology and CP beneficiary or non-beneficiary status are found in Exhibit 5 hereto. The analogous counts for awarded units are found in Exhibit 7 hereto. Chances were derived by comparing all CP beneficiary entrants with all CP beneficiary units that were awarded, and by comparing all non-beneficiary entrants with all non-beneficiary units that were awarded.

Table 1 – Chances per 1,000 entrants of an award of a lottery unit, by CD typology			
CD typology	Non-beneficiary entrant chances	CP beneficiary entrant chances	[Redacted]
Majority White	[Redacted]		
Majority Black			
Majority Hispanic			
Majority Asian			
Plurality White			
Plurality Black			
Plurality Hispanic			

47. [Redacted]

48. [Redacted] to what extent, within each CD typology, are one or more groups taking advantage of CP beneficiary status more than others?

49. I examined this question in two ways, each looking at the distribution of applicant HHs as related to non-beneficiary applicant HHs versus CP beneficiary HHs. The first method was to examine separately the total number of applicant HHs from each of the four racial or ethnic groups being analyzed in this report (both CP beneficiary and non-beneficiary) and to see in each

case what percentage of that total was represented by the CP beneficiary applicant HHs. [Redacted]

Table 2 – Comparing each group’s CP beneficiary applications as a percentage of that group’s total applications against the highest such percentage for any group, by CD typology					
CD typology	Group with highest percentage of its awardees being CP beneficiary awardees	Relative percentage by which highest group exceeds other groups			
		White	Black	Hispanic	Asian
Majority White	[Redacted]				
Majority Black					
Majority Hispanic					
Majority Asian					
Plurality White					
Plurality Black					
Plurality Hispanic					

50.

[Redacted]

[Redacted]

51. [Redacted]

52. My second method [Redacted] was to examine the demographic distribution of non-beneficiary applicants versus CP beneficiary applicants. The question was the extent to which a group was represented:

a. at a higher level among CP beneficiary applicants [Redacted]
than among non-beneficiary applicants [Redacted]

or

b. at a lower level among CP beneficiary applicants than among non-beneficiary applicants [Redacted]

53. [Redacted]

54. In all cases, I compared the group’s share of the non-beneficiary entrants with that group’s share of CP beneficiary entrants. An increase [Redacted] is represented by a positive number; a decrease [Redacted] is represented by a negative number.

55. [Redacted]

Table 3 – Comparing relative percentage change for each group from share of non-beneficiary entrants to share of CP beneficiary entrants, by CD typology				
CD typology	White	Black	Hispanic	Asian
Majority White	[Redacted]			
Majority Black				
Majority Hispanic				
Majority Asian				
Plurality White				
Plurality Black				
Plurality Hispanic				

56. [Redacted]

57. [Redacted]

58. [Redacted]

59. [Redacted]

F. [Redacted]

60. [Redacted]

[Redacted]

.²¹

61. I wanted to examine whether [Redacted]

the subset who are apparently eligible.

62. These are HHs who, by the information provided by the applicant HH, would appear to be eligible for one or more unit-types in a lottery they had entered.²² [Redacted]

.²³ [Redacted]

63. [Redacted]

²¹

[Redacted]

²² Applicant HHs do not apply for particular unit types; they apply generally to a lottery.

²³

[Redacted]

[Redacted]

64. [Redacted]

24

65. [Redacted]

66. These procedures allowed me to have a universe of apparently eligible HHs.²⁵ Proceeding as I had with my entrant analysis, I was able to create a sub-universe of apparently-eligible CP beneficiary applicant HHs and a sub-universe of apparently-eligible non-beneficiary applicant HHs.

67. [Redacted]

²⁴ See further discussion in Sections VI to XI in the Sources and Methodology Appendix.

²⁵ The counts of apparently-eligible applicant HHs by typology and CP beneficiary or non-beneficiary status are found in Exhibit 6 hereto.

Table 4 – Chances per 1,000 apparently eligible HHs of an award of a lottery unit, by CD typology			
CD typology	Non-beneficiary apparently eligible HH chances	CP beneficiary apparently eligible HH chances	[Redacted]
Majority White	[Redacted]		
Majority Black			
Majority Hispanic			
Majority Asian			
Plurality White			
Plurality Black			
Plurality Hispanic			

68. [Redacted]

26

69. [Redacted]

26

[Redacted]

Table 5 – Comparing each group’s CP beneficiary apparently eligible HHs as a percentage of that group’s total apparently eligible HHs against the highest such percentage for any group, by CD typology					
CD typology	Group with highest percentage of its apparently eligible HHs being CP beneficiary apparently eligible HHs	Relative percentage by which highest group exceeds other groups			
		White	Black	Hispanic	Asian
Majority White	[Redacted]				
Majority Black					
Majority Hispanic					
Majority Asian					
Plurality White					
Plurality Black					
Plurality Hispanic					

70.

[Redacted]

.27

[Redacted]

71.

[Redacted]

27

[Redacted]

[Redacted]

72. There is, of course, a second test (as there was for entrants), this one looking at the relative difference between a group’s share of all non-beneficiary apparently-eligible HHs and that group’s share of all CP beneficiary apparently-eligible HHs.

73. [Redacted]

Table 6 – Comparing relative percentage change for each group from share of non-beneficiary apparently eligible HHs to share of CP beneficiary apparently eligible HHs, by CD typology				
CD typology	White	Black	Hispanic	Asian
Majority White	[Redacted]			
Majority Black				
Majority Hispanic				
Majority Asian				
Plurality White				
Plurality Black				
Plurality Hispanic				
Plurality Hispanic				

74. [Redacted]

28 [Redacted]

75. [Redacted]

76. [Redacted]

G. [Redacted]

77. [Redacted]

Table 7 – Comparing each group’s CP beneficiary awardees as a percentage of that group’s total awardees against the highest such percentage for any group, by CD typology					
CD typology	Group with highest percentage of its awardees being CP beneficiary awardees	Relative percentage by which highest group exceeds other groups			
		White	Black	Hispanic	Asian
Majority White		[Redacted]			
Majority Black					
Majority Hispanic					
Majority Asian					
Plurality White					
Plurality Black					
Plurality Hispanic					
Plurality Asian					

78. [Redacted]

.²⁹ [Redacted]

79. [Redacted]

80. The second test at the awardee stage, as with the other stages, is relative percentage change for each group from its share of non-beneficiary awardees to its share of CP beneficiary awardees. [Redacted]

Table 8 – Comparing relative percentage change for each group from share of non-beneficiary awardees to share of CP beneficiary awardees, by CD typology				
CD typology	White	Black	Hispanic	Asian
Majority White	[Redacted]			
Majority Black				
Majority Hispanic				
Majority Asian				
Plurality White				
Plurality Black				
Plurality Hispanic				
Plurality Hispanic				

29

[Redacted]

81. [Redacted]

82. [Redacted]

83. [Redacted]

84. [Redacted]

85. [Redacted]

H. Additional observations[Redacted]

86. [Redacted]

[Redacted]

87. [Redacted]

30

[Redacted]

88. [Redacted]

89. [Redacted]

[Redacted]

30

[Redacted]

[Redacted]

90. This subset of unit types, the projects they were associated with, their AMI bands, and the number of lottery units awarded to CP awards of than disability in each unit type are listed in Exhibit 8, hereto.

91. [Redacted]

92. [Redacted]

93. [Redacted]

I. Participation in lotteries outside of an applicant HH's community district or borough

94. In my declaration of June 1, 2017 (the supplement to this report that I am submitted together with this document), I found that [Redacted]

[Redacted]

.31

95. That analysis was based on a larger number of lotteries of which the 168 lotteries being analyzed elsewhere in this report formed a substantial part. I continue to believe those findings to be true.

J. Segregation in New York City and its perpetuation

96. Residential segregation has been measured for decades. New York City has long been highly segregated with respect to Blacks and Hispanics ever since they came to live in the City in relatively large numbers. The table below shows two of the most common segregation indexes with the results for the City from 1980 through the present. I computed all of these indexes; those through 2010 were published in a book that I co-authored and co-edited.³²

Table 9 - Segregation Indexes for New York City 1980 through 2013-2017 ACS					
	1980	1990	2000	2010	2013-17 ACS
Dissimilarity NHBlack/NHWhite	0.83	0.84	0.84	0.82	0.86
Dissimilarity NHWhite/Hispanic	0.64	0.66	0.67	0.66	0.69
Dissimilarity NHAsian/NHWhite	0.49	0.48	0.50	0.52	0.57
Isolation NHWhite/NHBlack	0.82	0.84	0.85	0.84	0.84
Isolation NHWhite/Asian	0.25	0.34	0.44	0.52	0.56
Isolation NHWhite/Hispanic	0.62	0.69	0.73	0.73	0.72

³¹ See Section E of that declaration, and the accompanying Exhibit 9.

³² The indexes for 1980 through 2010 are taken from Andrew A. Beveridge, David Halle, Edward Telles, and Beth Leavenworth Dufault, “Residential Diversity and Division” in *New York and Los Angeles: The Uncertain Future*, David Halle and Andrew A. Beveridge (eds.) (New York: Oxford University Press, 2013, p 316). The most recent set of indexes uses the same program as the earlier indexes, based upon more recent data from the 2013-17 ACS. All these indexes are based upon the Census tract data.

97. These indexes get at two different dimensions of segregation. The dissimilarity index measures how evenly a population is spread out in a given area. If the population is evenly distributed, then the measure is zero; if completely segregated, the measure is one. The measure gives the proportion of the population that would need to be moved to get to perfect evenness. For New York City, the measure has risen from .82 to .86 for Blacks and Whites since 2010. These figures have shown very little variation since 1980. An increase is also seen for Hispanics and Asians as compared with whites from Census 2010 to ACS 2013-17.

98. The isolation measures express the average percent of other groups that one would find in a specified region (here census tracts). The isolation measure for Blacks and Hispanics is high, and that for Asians seems to be rising. For all these measures, the contrast category is Whites.

99. New York City's level of segregation by these measures was and remains high. Particularly notable is the fact the City has apparently made little or no progress in reducing segregation levels over time, especially as compared with the results of most other large cities.

100. New York City's levels of segregation translate quite directly into the highly-concentrated nature of many of the community districts in New York City. Four maps of the distribution of the population groups assessed in this report, overlaid with community district boundaries, are attached hereto as Exhibits 9-12. As is apparent from the maps and from the CD typologies, many of the community districts vary considerably in the extent to which each of the major groups is present. For example, Whites tend to be most concentrated in some areas of Manhattan, Brooklyn, and Staten Island. When compared with the map of the Black population, it is clear how separate the two populations are. The Hispanic population is concentrated in the Bronx and in some parts of Manhattan and Queens. And the Asian population is growing and becoming most concentrated in Queens. [Redacted]

[Redacted]

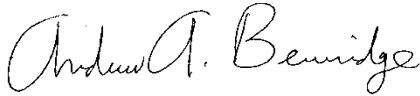
101.

[Redacted]

K. Conclusion

102.

[Redacted]



Andrew A. Beveridge

Exhibit 1**CURRICULUM VITAE**

Updated 2/28/2019

Andrew Alan BeveridgeOffice: [Redacted]
[Redacted]

Home: [Redacted]

[Redacted]

EDUCATION

1968-73 Yale University (Sociology), M.Phil.1971; Ph.D. 1973
 1967-68 Yale University (Econometrics, Economic Theory)
 1964-67 Yale College (Economics), B.A. 1967, with honors in economics
 1963-64 California Institute of Technology (Freshmen Year, Math, Science)

RECOGNITION AND AWARDS

2018 Best New End User Product, Charleston Advisor Sixteenth Annual Readers' Choice Awards (A Major Reviewer of Digital Products)
 2016 *The Threat to Representation for Children and Non-Citizens (Evenwel v. Abbott)* (Report Author and Co-Creator) named Best Law Website by the Webby Awards
 2015 *Census Explorer* (Co-Creator) named Webby Honoree in Government
 2015 *Social Explorer* (Co-Creator) awarded Gold Medal, Modern Library Award
 2014 *Social Explorer* (Co-Creator) named Webby Honoree in Education
 2013 *Social Explorer* (Co-Creator) named Outstanding Achievement, Interactive Media Association
 2012 *Social Explorer* (Co-Creator) named Publishing Standard of Excellence, Web Marketing Association
 2010 *Social Explorer* (Co-Creator) named Outstanding Reference Source by the Reference and Users Services Association of the American Libraries Association
 2007 American Sociological Association *Public Understanding of Sociology Award*
 2006-pres. Marquis *Who's Who in the World*
 2005-pres. Marquis *Who's Who in America*

TEACHING EXPERIENCE

2006-2018 Chair, Queens College, Department of Sociology
 2002-pres. Professor, Queens College and Ph.D. Program in Sociology, Graduate School and University Center, The City University of New York
 1981-2001 Associate Professor of Sociology, Queens College, and Ph.D. Program in Sociology Graduate School and University Center, The City University of New York
 1981-82 Associate Professor of Sociology, Columbia University
 1973-81 Assistant Professor of Sociology, Columbia University
 1972-73 Acting Instructor, Department of Sociology, Yale University
 1969-70 Assistant in Instruction, Department of Sociology, Yale University

RESEARCH APPOINTMENTS

2008-pres. Executive Committee Member and Affiliate, CUNY Institute for Demographic Research
 1987-88 Visiting Researcher, Center for Studies of Social Change, The New School for Social Research
 1982-83 Research Associate, Center for the Social Sciences, Columbia University
 1980-82 Co-Director, Annual Housing Survey Project, Center for the Social Sciences, Columbia University
 1970-72 Research Affiliate, Institute for African Studies (the former Rhodes-Livingstone Institute), Lusaka, Zambia
 1965-69 Research Assistant and Programmer, Department of Economics and Economic Growth Center, Yale University

OTHER RELATED ACTIVITIES (Continued)

2

OTHER RELATED ACTIVITIES

- 2006-pres. Co-Founder (with Ahmed Lacevic) and President, *Social Explorer, Inc.* A web-based map and data service, now distributed by Oxford University Press and Pearson Publishing. Assisted Development of over 200 activities to accompany introductory Sociology, Political Science and History Texts.
- 1997-pres. President of Andrew A. Beveridge, Inc., a Demographic and Social Science Data Consulting Firm that provides consulting in litigation and other settings. (Cases and other engagements listed below.)
- 1993-pres. Consultant to the Newspaper Division of *the New York Times*. Work with reporters and editors regarding covering social science and demographic trends. Analyses and data cited over 1,000 times in newspaper. (Selected analyses listed below)
- 2001-pres. Columnist for the *Gotham Gazette*. Write Demographic Topic on recent trends and news related to social and demographic trends. (Topic Columns listed below.)

PUBLICATIONS**Book**

- 1979 *African Businessmen and Development in Zambia.* Andrew A. Beveridge and A. Oberschall. Princeton N.J. and Guildford, Surrey, United Kingdom: Princeton University Press, 382 pages.

Edited Books

- 2013 *New York and Los Angeles: The Uncertain Future.* (David Halle and Andrew A. Beveridge, Co-Editors) New York: Oxford University Press. 624 pages; 38 maps, 35 graphs, 27 photos, and 79 tables.
- 2011 *Cities in American Political History,* (Associate editor) (Editor. Richardson Dillworth), Sage-CQ Press, 760 pages. Named one of *Choice's* Outstanding Academic Titles of 2012.

Papers and Chapters

- 2018 "Relating Economic and Demographic Change in the United States from 1970-2012: A Preliminary Examination Using GIS and Spatial Analysis Techniques with National Data Sources." Andrew A. Beveridge. In Ian Gregory, Don Debats, Don Lafreniere (Eds.) *The Routledge Companion to Spatial History.* Pp. 92-129.
- 2014 "The Development and Persistence of Racial Segregation in United States Urban Areas: 1880 to 2010." Andrew A. Beveridge. Pp 35-61. In Ian Gregory and Alistair Geddes (eds.) *Towards Spatial Humanities: Historical GIS and Spatial History.* Bloomington, IN: Indiana University Press.
- 2013 "New York and Los Angeles: The Uncertain Future." David Halle and Andrew A. Beveridge. Pp. 1-30 in *New York and Los Angeles: The Uncertain Future.*
- 2013 "The Big Picture: Demographic and Other Changes." Andrew A. Beveridge and Sydney J. Beveridge. Pp. 33-78 in *New York and Los Angeles: The Uncertain Future.*
- 2013 "Financial, Economic and Political Crises: From Sub-Prime Loans to Dodd-Frank, Occupy Wall Street and Beyond." David Halle and Andrew A. Beveridge. Pp. 154-93 in *New York and Los Angeles: The Uncertain Future.*
- 2013 "Residential Diversity and Division: Separation and Segregation among Whites, Blacks, Hispanics, Asians, Affluent and Poor." Andrew A. Beveridge, David Halle, Edward Telles, and Beth Leavenworth Default. Pp. 310-42 in *New York and Los Angeles: The Uncertain Future.*
- 2011 "Avenue to Wealth or Road to Financial Ruin? Home Ownership and Racial Distribution of Mortgage Foreclosures." Elena Vesselinov and Andrew A. Beveridge. In Christopher Niedt and Marc Silver (eds.) *Forging a New Housing Policy: Opportunity in the Wake of Crisis.* Hempstead NY: National Center for Suburban Studies, Hofstra University, pp. 45-55.

PUBLICATIONS (Continued)

3

- 2011 "The Rise and Decline of the L.A. and New York Schools." David Halle and Andrew A. Beveridge. In Dennis R Judd and Dick Simpson (eds.) *The City, Revisited Urban Theory from Chicago, Los Angeles and New York*. Minneapolis, MN: University of Minnesota Press, pp. 137-69.
- 2011 "Commonalities and Contrasts in the Development of Major United States Urban Areas: A Spatial and Temporal Analysis from 1910 to 2000." Andrew A. Beveridge. In Myron P. Guttman, Glenn D. Deane, Emily R. Merchant and Kenneth M. Sylvester (eds.) *Navigating Time and Space in Population Studies*, Springer for the International Union for the Scientific Study of Population, pp. 185-216.
- 2009 "How Does Test Exemption Affect Schools' and Students' Academic Performance?" Jennifer L. Jennings and Andrew A. Beveridge. *Educational Evaluation and Policy Analysis*, vol. 31: June, pp. 153-75.
- 2008 "A Century of Harlem in New York City: Some Notes on Migration, Consolidation, Segregation and Recent Developments." Andrew A. Beveridge. *City and Community* vol. 7:4 pp. 357-64.
- 2007 "Who Counts for Accountability? High-Stakes Test Exemptions in a Large Urban School District." Jennifer Booher-Jennings and Andrew A. Beveridge. In A. Sadovnik, J. O'Day, G. Bohrnstedt, & K. Borman (eds.) *No Child Left Behind and the Reduction of the Achievement Gap: Sociological Perspectives on Federal Education Policy*. Routledge, Taylor & Francis Group, pp. 77-95.
- 2006 "Community-Based Prevention Programs in the War on Drugs: Findings from the 'Fighting Back' Demonstration." Leonard Saxe, Charles Kadushin, Elizabeth Tighe, Andrew A. Beveridge, David Livert, Archie Brodsky and David Rindskopf, *Journal of Drug Issues*, vol. 36:2 pp. 263-94.
- 2006 "Varieties of Substance Use and Visible Drug Problems: Individual and Neighborhood Factors." Julie Ford and Andrew A. Beveridge. *Journal of Drug Issues*, vol. 36:2, pp. 377-92.
- 2006 "Neighborhood Crime Victimization, Drug Use And Drug Sales: Results From The 'Fighting Back' Evaluation." Julie Ford and Andrew A. Beveridge. *Journal of Drug Issues*, vol. 36:2, pp. 393-416.
- 2006 "Scale-Up Methods as Applied to Estimates of Heroin Use." Charles Kadushin, Peter D. Killworth, Russell H. Bernard, Andrew A. Beveridge. *Journal of Drug Issues*, vol. 36:2, pp 417-40.
- 2004 "'Bad' Neighborhoods, Fast Food, 'Sleazy' Businesses and Drug Dealers: Relations between the Location of Licit and Illicit Businesses in the Urban Environment." Julie Ford and Andrew A. Beveridge. *Journal of Drug Issues*, vol. 34:1, pp. 51-76.
- 2003 "Race and Class in the Developing New York and Los Angeles Metropolises: 1940 to 2000." Andrew A. Beveridge and Susan Weber. In David Halle (ed.) *New York and Los Angeles: Politics, Society and Culture, A Comparative View*. University of Chicago Press, pp. 49-78.
- 2003 "Residential Separation and Segregation, Racial and Latino Identity, and the Racial Composition of Each City." David Halle, Robert Gedeon and Andrew A. Beveridge. In David Halle (ed.) *New York and Los Angeles: Politics, Society and Culture: A Comparative View*. University of Chicago Press, pp. 150-90.
- 2003 "The Black Presence in the Hudson River Valley, 1790 to 2000: A Demographic Overview." Andrew A. Beveridge and Michael McMenemy. In Myra B. Armistead (ed.) *Mighty Change, Tall Within: Black Identity in the Hudson Valley*. State University of New York Press, pp. 263-80.
- 2002 "Immigrant Residence and Immigrant Neighborhoods in New York, 1910 and 1990." Andrew A. Beveridge. In Pyong Gap Min (ed.) *Classical and Contemporary Mass Migration Periods: Similarities and Differences*. Altamira Press, pp.199-231.

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- 2002 "Immigration, Ethnicity and Race in Metropolitan New York, 1900-2000." Andrew A. Beveridge. In Anne Kelly Knowles (ed.) *Past Time, Past Place: GIS for History*. ESRI Press, pp. 65-78.
- 2001 "The Visibility of Illicit Drugs: Implications for Community-based Drug Control Strategies." Leonard Saxe, Charles Kadushin, Andrew A. Beveridge, David Livert, Elizabeth Tighe, Julie Ford and David Rindskopf, *American Journal of Public Health*, vol. 91:12, pp. 1987-94.
- 2001 "Does Neighborhood Matter? Family, Neighborhood and School Influences on Eighth-Grade Mathematics Achievement." Sophia Catsambis and Andrew A. Beveridge. *Sociological Focus*, vol. 34, October, pp. 435-57.
- 2001 "Simulating Social Research Findings To Aid in Teaching Introductory-Level Sociology Courses." Andrew A. Beveridge, Joanne Miller, Dean Savage, Lauren Seiler and Carmenza Gallo. In Vernon Burton (ed.) *The Renaissance of Social Science Computing*. Champaign: University of Illinois Press.
- 2000 "Survey Estimates of Drug Use Trends in Urban Communities: General Principles and Cautionary Examples." Andrew A. Beveridge, Charles Kadushin, Leonard Saxe, David Rindskopf and David Livert. *Substance Use and Misuse*, vol. 35, pp. 85-117.
- 1997 "Think Globally Act Locally: Assessing the Impact of Community-Based Substance Abuse Prevention." Leonard Saxe, Emily Reber, Denise Hallfors, Charles Kadushin, Delmos Jones, David Rindskopf and Andrew A. Beveridge. *Evaluation and Program Planning*, vol. 20:3, pp. 357-66.
- 1988 "An Evaluation of 'Public Attitudes toward Science and Technology' in *Science Indicators the 1985 Report*." Andrew A. Beveridge and Fredrica Rudell. *Public Opinion Quarterly*, vol. 53: Fall, pp. 374-85.
- 1986 "Microcomputers as Workstations for Sociologists." Andrew A. Beveridge. *Sociological Forum*, vol. 1: Fall, pp. 701-15.
- 1985 "Running Records and the Automated Reconstruction of Historical Narrative." Andrew A. Beveridge and George V. Sweeting. *Historical Social Research* vol. 35: July, pp. 31-44.
- 1985 "Local Lending Practices: Borrowers in a Small Northeastern Industrial City, 1832-1915." Andrew A. Beveridge. *Journal of Economic History*, vol. 65:2, pp. 393-403.
- 1985 "Action, Data Bases, and the Historical Process: The Computer Emulating the Historian?" Andrew A. Beveridge and George V. Sweeting. In Robert F. Allen (ed.), *Data Bases in the Humanities and Social Sciences*. Osprey Florida, Paradigm Press, Inc., pp. 117-22.
- 1981 "Studying Community, Credit and Change by Using 'Running' Records from Historical Sources." Andrew A. Beveridge. *Historical Methods*, vol. 14:4, pp. 153-62.
- 1980 "Organizing 'Running' Records to Analyze Historical Social Mobility." Andrew A. Beveridge, George R. Hess and Mark P. Gergen. In Joseph Raben and Gregory Marks (eds.), *Data Bases in the Humanities and Social Sciences*. Amsterdam and New York, North-Holland Publishing Company, pp. 157-64.
- 1977 "Social Effects of Credit: Cheshire County, New Hampshire: 1825-1860." Andrew A. Beveridge. *Regional Economic History Research Center Working Papers*, Autumn, pp. 1-33.
- 1974 "Economic Independence, Indigenization and the African Businessman: Some Effects of Zambia's Economic Reforms." Andrew A. Beveridge. *African Studies Review*, vol. 17:3, pp. 477-92.

Maps

- 2011 "Charles Burnett's Los Angeles, Circa 1970: The City" and "Charles Burnett's Los Angeles, Circa 1970: His Neighborhood." Andrew A. Beveridge. In Robert E. Kapsis

PUBLICATIONS (Continued)

5

(ed.), *Charles Burnett Interviews*. Jackson, MS, University of Mississippi Press, in folio between p. 94 and p. 95.

Web Based Materials

- 2005-- *Social Explorer*. A system for retrieving, mapping, charting and graphing Census data from 1790 to present and other data. Co-Creator with Ahmed Lacevic and Social Explorer Team.
- 2013-15 *Census Explorer*. Visualizations of Census Data. People Education and Income Edition, Commuting Edition, Retail Edition, Population Estimates Edition, Young Adults: Then and Now Edition, and 2010 Census Participation Rate Edition. Co-Creator with Ahmed Lacevic and Social Explorer Team and US Census Bureau. Young Adults: Then and Now Edition. Co-Created with Minnesota Population Center and US Census Bureau. Winner Webby Honoree for Government, 2015.

Invited Pieces and Columns**Gotham Gazette Demographic Topic Columns: January 2001-2013.**

- "New York's Changing Electorate: What It Means for the Mayoral Candidates" Jun 16, 2013
 "New Plan for City Council Districts" (November 16, 2012) (Christian Salazar and Andrew A. Beveridge)
 "Proposed City Council District Map Protects Incumbents" (November 15, 2012)
 "The Attempt to Kill the ACS" (July, 2012)
 "10 Years Later: Enumerating the Loss at Ground Zero" (September 10, 2011)
 "Under a Different Name Census Data is Ready for Perusal" (August 11, 2011)
 "Failure of Redistricting Reform Could Bring Reprise of 2002's Fiasco" (June 16, 2011)
 "Census Wounded City's Pride but Probably Got the Numbers Right" (April 26, 2011)
 "Census Brings Unpleasant Surprise for State Politicians" (January 04, 2011)
 "Census Likely to Offer Accurate Count of New Yorkers" (September 16, 2010)
 "Census Could Set Off Major Redistricting in State" (February 25, 2010)
 "New York's Now Beleaguered Financial Workforce" (August 2009)
 "New York and the Fight Over the 2010 Census" (February 2009)
 "The Senate's Demographic Shift" (November 2008)
 "A Shift in Albany Could Avert Higher Rents" (October 2008)
 "An Affluent, White Harlem?" (August 2008)
 "The School Divide Starts at Kindergarten" (June 2008)
 "Housing Squeeze Shows No Sign of Easing" (May 2008)
 "A Religious City" (February 2008)
 "Will the 2010 Census 'Steal' New Yorkers?" (December 2007)
 "The End of 'White Flight'?" (November 2007)
 "Feeling the Effects of a Housing Bust" (September 2007)
 "No Quick Riches for New York's Twentysomethings" (June, 2007)
 "Women of New York City" (March, 2007)
 "Stuyvesant Town and Peter Cooper Village, Then and Now" (September, 2006)
 "What New Yorkers Are Like Now" – First Results of the American Community Survey" (August 2006)
 "Hitting the 9 Million Mark" (June, 2006)
 "New York's Asians" (May, 2006)
 "Undocumented Immigrants" (April, 2006)
 "Transit Workers/Transit Riders; Beginning Lawyers Are Richer; 9 Million New Yorkers?" (March 2006)
 "Teachers in NYC's Institutions of Higher Learning" (January, 2006)
 "Hispanics and the Ferrer Candidacy" (December, 2005)
 "Disabled in New York City; Also: Is The City Still Booming?" (November 2005)
 "Who Can Afford to Live in New York City?" (October 2005)
 "Can NYC 'Profile' Young Muslim Males?" (August 2005)
 "Upstate and Downstate – Differing Demographics, Continuing Conflicts" (July, 2005)
 "Living at Home after College" (June, 2005)

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6

- "Four Trends That Shape The City's Political Landscape" (May 2005).
 "High School Students" (April, 2005)
 "New York's Responders and Protectors" (March, 2005)
 "Who Got the Death Penalty" (February, 2005)
 "Wall Street Bonus Babies" (January, 2005)
 "New York Lawyers: A Profile" (December, 2004)
 "Bush Does Better and Other Election Results In NYC" (November, 2004)
 "New York's Creative Class" (October, 2004)
 "Portrait of Same-Sex (Married) Couples" (September 2004)
 "New York City Is a Non-Voting Town" (August 2004)
 "New York's Divided Afghans" (July 2004)
 "Flaws in the New School Tests" (June, 2004)
 "Why Is There A Plunge In Crime?" (May 2004)
 "Estimating New York City's Population" (April, 2004)
 "The Passion for Religion Ebbs" (March, 2004)
 "Imprisoned In New York" (February, 2004)
 "Who Are NYC's Republicans?" (January 2004)
 "Five Hidden Facts about Housing--An Analysis of Data from the Housing and Vacancy Survey"
 (December, 2003)
 "Young, Graduated and in New York City" (October, 2003)
 "Back To (Public and Private) School" (September, 2003)
 "The Vanishing Jews" (July, 2003)
 "The Affluent of Manhattan" (June, 2003)
 "How Different Is New York City From The United States?" (May 2003)
 "The Poor in New York City" (April, 2003)
 "Eight Million New Yorkers? Don't Count On It" (March 2003)
 "Does Archie Bunker Still Live in Queens?" (February 2003)
 "Is There Still A New York Metropolis?" (January 2003)
 "City of the Foreign-Born" (December, 2002)
 "Can The US Live Without Race?" (November 2002)
 "New York's Declining Ethnics" (October 2002)
 "A Demographic Portrait of the Victims in 10048" (September, 2002)
 "Manhattan Boom" (August, 2002)
 "GOP Senate Majority Repeals Census 2000" (July, 2002)
 "Changing New York City" (June, 2002)
 "The Census Bureau's Bad Estimates" (May, 2002)
 "The Boom 1990's?" (April 2002)
 "Segregation" (March, 2002)
 "Non-Legal Immigrants" (February, 2002)
 "Counting Muslims" (January, 2002)
 "The Arab Americans in Our Midst" (September, 2001)
 "A White City Council" (August, 2001)
 "Counting Gay New York" (July, 2001)
 "Redistricting" (June, 2001)
 "Politics and the Undercount" (May, 2001)
 "False Facts about Census 2000" (April, 2001)
 "Eight Million New Yorkers!" (March 2001)
 "Redefining Race" (February, 2001)
 "Census Bureau Finds 830,000 'Extra' New Yorkers" (January 2001)

Other:

- 2013 "The Two Cities of New York: Wealth, Poverty, and Diversity in the Big Apple." *ASA Footnotes*, February p. 1.
 2007 "Four Trends Shaping the Big Apple." *ASA Footnotes*, February, p. 1.
 1996 "Sociologists: Eyes Open for Trends in New York City." *ASA Footnotes*, January, p. 1.
 1996 "Stroll the Upper East Side for Lifestyles of the Elite." *ASA Footnotes*, March, p. 1
 1988 "Credit to the Community: American Banking's Tribal Roots." *Thesis* (Spring), pp. 18-23.
 1976 "African Businessmen in Zambia." *New Society*, 35:702: pp. 599-601.

Book Reviews

PUBLICATIONS (Continued)

7

- 2012 "Social Theory Two Ways: John Levi Martin's Structures and Actions" Review of *Social Structures* and *The Explanation of Social Action*. *Historical Methods Historical Methods: A Journal of Quantitative and Interdisciplinary History*, 45:4, 179-182.
- 1995 *The Assassination of New York*. Robert Fitch. *Contemporary Sociology*, vol. 24: March, pp. 233-34.
- 1990 *Doing Deals: Investment Banks at Work*. Robert G. Eccles and Dwight B. Crane. *Contemporary Sociology*, vol. 19: May, pp. 186-87.
- 1988 *The End of Economic Man? Custom and Competition in Labor Markets*. David Marsden. *Contemporary Sociology*, vol. 17: March, pp. 172-73.
- 1988 *Techno crimes: The Computerization of Crime and Terrorism*. August Beqaa. *Society*, vol. 25: May/June, pp. 87-88.
- 1985 *The Economic Basis of Ethnic Solidarity: Small Business in the Japanese American Community*. Edna Bonacis and John Modell. *American Journal of Sociology*, vol. 90: January, pp. 942-45.
- 1979 *Oneida Community Profiles*. Constance Noyes Robertson. *Business History Review*, vol. 53: Autumn, pp. 277-78.
- 1978 *Urban Man in Southern Africa*. C. Cleff and W.C. Pendleton (eds.) *African Studies Association Review of Books*, vol. 4, pp. 25-26.
- 1977 *Colonialism in Africa, 1870-1960 Volume Four: The Economics of Colonialism*. Peter Duignan and L.H. Gann (eds.) *Business History Review*, vol. 51: Autumn, pp. 382-85.
- 1976 *The Quality of American Life: Perceptions, Evaluations, and Satisfactions*. Angus Campbell, Philip Converse, and Willard L. Rogers (Eds.). *Political Science Quarterly*, vol. 91: Fall, pp. 529-31.
- 1976 *Corporate Power in an African State: The Political Impact of Multinational Mining Companies in Zambia*. Richard L. Skylar. *African Studies Association Review of New Books*, vol. 2, pp. 53-55.

Reports

- 2000 *Fighting Back Household Survey, Interim Report of 1995-1999 Findings*. David Livert, Charles Kadushin, Leonard Saxe, Andrew A. Beveridge, David Rindskopf, Elizabeth Tighe, Jennifer Hoffman, Saul Kellner, Ricardo Barrera's and Julie Ford.
- 1997 *Fighting Back Evaluation Interim Report: Wave II General Population*. Survey David Livert, Charles Kadushin, Leonard Saxe, Andy A. Beveridge, David Rindskopf, Elizabeth Tighe, Jennifer Hoffman, Saul Kelner, Ricardo Barreras and Julie Ford.
- 1997 *Monitoring Archival Indicators of Alcohol and Other Drug Harm: A Fighting Back Progress Report*. Andrew A. Beveridge, Elizabeth Tighe, Mary Jo Larson, David Rindskopf, David Livert, Susan Weber, Charles Swartz, John McKenna, Charis Ng and Leonard Saxe.
- 1997 *Social Trends in North America*: Andrew A. Beveridge, Vivian Brachet, Lorne Tepperman and Jack Veugelers. Prepared for the State of the Environment Report of the Consortium for Environmental Cooperation, Montreal, Quebec.
- 1996 *Fighting Back Program Interim Report*, Leonard Saxe, Emily Reber, Charles Kadushin, Andrew A. Beveridge, Mary Jo Larson, David Rindskopf, David Livert, Joe Marchese, Michael Stirrat and Susan Weber.
- 1994 *Black and White Property Tax Rates and Other Homeownership Costs in 30 Metropolitan Areas: A Preliminary Report*. Andrew A. Beveridge and Jeannie D'Amico. Queens College of the City University of New York, Department of Sociology, Program for Applied Social Research.
- 1994 *An Analysis of Black and White Income Differences: Queens County and the United States*. Andrew A. Beveridge and Jeannie D'Amico. Queens College of the City University of New York, Department of Sociology, Program for Applied Social Research.
- 1992 *Patterns of Residential Segregation in New York City, 1980-1990: A Preliminary Analysis*. Andrew A. Beveridge and Hyun Sook Kim. Queens College of the City University of New York, Department of Sociology, Program in Applied Social Research.

PUBLICATIONS (Continued)

8

- 1988 *Integrating Social Science Workstations into Research and Teaching: Final Report to IBM.* Andrew A. Beveridge and Lauren Seiler. Queens College of the City University of New York, Department of Sociology.
- 1984 *Changing Lifestyles and Newspaper Reading: An Exploratory Study of Younger Adults.* Andrew A. Beveridge and Albert E. Gollin. Newspaper Readership Project, Newspaper Advertising Bureau.
- 1978 Social Effects of Time of Use Pricing of Electric Power: A Sociological Approach. Andrew A. Beveridge. Electric Power Research Institute

SELECTED RECENT PRESENTATIONS**Presentations of Scholarly Work**

- 2019 Andrew A. Beveridge, "Nobel Prize Winners, Immigration, New York City and Foreign Roots." Presented at the Annual Meeting of the American Association for the Advancement of Science, Washington, DC, February, 14-17.
- 2017 Andrew A. Beveridge and Shige Song. "Is it Still the Economy Stupid? A Spatial Regression Analysis of the 2016 Presidential Election Using the American Community Survey Data and Other Materials." Presented at the 2017 American Community Survey, Users Group Conference, Alexandria, VA, May 11-12
- 2014 Andrew A Beveridge, "Four Mayor, Two Thugs and Governor Moonbeam: New York and Los Angeles Compared" American Sociological Association, Annual Meeting, San Francisco, August 16-19
- 2013 Ahmed. Lacevic, Andrew A. Beveridge, and Sydney. Beveridge. "New Directions in Visualization for Web Based Historical GIS." Presented at the Annual Meeting of the Social Science History Association, November 21-24, Chicago, IL
- 2012 Elena Vesselinov and Andrew A. Beveridge. "Racial/Ethnic Typology, Occupational Structure and Mortgage Foreclosures in Neighborhood Context." Annual Meeting of the American Sociological Association, August, 17 to 20, Denver, CO
- 2012 "Studying Disparate Impact in Housing." National Research Council, Committee for National Statistic. Workshop, June 14 and 15, Washington, DC. Presentation Summarized in *Benefits, Burdens, and Prospects of the American Community Survey: Summary of a Workshop.* (National Academies Press, Washington, DC. 2013)
- 2012 "The Genesis of Crisis: "looting" by lenders, default by profligate borrowers, or government housing incentives." Annual Meeting, Eastern Sociological Society, February 23 to 26, New York City.
- 2011 Elena Vesselinov and Andrew A. Beveridge. "Foreclosures, Subprime Loans and the Neighborhood Effects of Race and Class in Detroit and Phoenix." Annual Meeting of the American Sociological Association, Las Vegas, NV, August 23.
- 2011 Andrew A. Beveridge and Elena Vesselinov. "From Chicago to Las Vegas? The Housing Bubble, Ethnic Communities, Social Class and the Effects of Mortgage Foreclosures." Annual Meeting of the American Sociological Association, Las Vegas, NV, August 22.
- 2011 "The Demographics of Boom and Bust: New York and LA Metros, 1990 to 2011." Annual Meeting of the American Sociological Association, August 20, Las Vegas, NV.
- 2011 "How Do Current Districts Stack-Up." The Redistricting Puzzle: The Shifting Sands of Population and the Electorate: Changes in New York. CUNY Graduate Center. May 5.
- 2011 "Displacing Hope: Hope VI and the Destruction of Housing for Poor Families." Annual Meeting of the Urban Affairs Association, March 16-19, New Orleans, LA.
- 2011 "2010 Census: Research Issues and Opportunities." Panelist. Annual Meeting of the Eastern Sociological Society, Philadelphia, PA, February 26.

SELECTED RECENT PRESENTATIONS (Continued)

9

- 2011 "The Effects of Foreclosure on Educational Performance." Annual Conference of the Sociology of Education Association. Asilomar Conference Center Pacific Grove, California. February 18-20, 2011.
- 2010 "The Origins of the "Bubble" and the Financial Crisis 2008: "Looting" by Lenders or Default by Profligate Borrowers." Andrew A. Beveridge. Annual Meeting of the Social Science History Association, November 18-21, Chicago, IL.
- 2010 "Success in Cumulative Voting Systems." Andrew A. Beveridge and Robert Smith. Annual Meeting of the Social Science History Association, November 18-21, Chicago, IL.
- 2010 "Avenues to Wealth or Roads to Financial Ruin? Homeownership and the Distribution of Mortgage Foreclosures. Elena Vesselinov and Andrew A. Beveridge. Annual Meeting of the American Sociological Association, August 15, Atlanta, GA.
- 2010 "Teacher Effectiveness on High- and Low-Stakes Tests," Corcoran, Sean P., Jennifer L. Jennings, and Andrew A. Beveridge. Presented at the Institute for Research on Poverty Summer Institute, University of Wisconsin – Madison, June.
- 2010 "Social Effects of Foreclosures in New York and Los Angeles Metros, a Preliminary Analysis. Andrew Beveridge and Elena Vesselinov. Eastern Sociological Society Annual Meeting, Boston, MA. March 18-21.
- 2010 "Homeowners No More: A First Look at the Foreclosure Crisis's Effects on Neighborhoods and Communities across the United States." Andrew Beveridge and Elena Vesselinov. Eastern Sociological Society Annual Meeting, Boston, MA. March 18-21.
- 2009 "Foreclosure Patterns and Demographic Trends in the Los Angeles and New York Metros." Presented at the Annual Meeting of the Social Science History Association. Long Beach, CA. November 12-15.
- 2009 "Cities: What the Classics Can Tell Urbanisms Today." Panel Presentation, Annual Meeting of the Social Science History Association, Long Beach, CA. November 12-15.
- 2009 "Reflecting on Efforts to Build Communities of Teachers, Learners, and Researchers using Web 2.0 Tools." Panel Presentation at the Annual Meeting of the American Sociological Association, San Francisco. August 8-11.
- 2009 "Sociologists and the Media: Developing Positive Relationships between Journalists and Academia." Workshop Presentation at the Annual Meeting of the American Sociological Association, San Francisco. August 8-11.
- 2008 "Religious Adherents and the 2000 Presidential Election: A Spatial Analysis." Presented at the Social Science History Association 2008 Annual Meeting, Miami, Florida, October 24-26.
- 2008 "Segregation Revisited: The Growth and Dispersal of Black, Latino, Immigrant and Ethnic Populations in United States Metropolitan Areas since 1950" Presented at Historical GIS 2008. University of Essex, UK. August 21-22.
- 2008 "Teacher Effects on High and Low-Stakes Tests," Jennifer L. Jennings and Andrew A. Beveridge. Annual Meeting of the American Education Research Association, New York, NY, March 25-28.

Selected Presentations Regarding *Social Explorer*

- 2014-19 American Sociological Association, Annual Meetings, Research Poster, Various Venues.
- 2014 National Science Foundation, March 25, Arlington, VA
- 2014 US Census Bureau, March 26, Suitland, MD
- 2014 American Association of Public Opinion Research, June 23, DC Chapter, Washington, DC3

SELECTED RECENT PRESENTATIONS (Continued)**10**

- 2014 Bureau of Labor Statistics, June 23, Washington, DC.
- 2013 American Sociological Association, Annual Meeting, Research Poster, Annual Meeting, San Francisco, August 16-19
- 2013 National Science Foundation NSF Course Curriculum and Laboratory Improvement Program/Transforming Undergraduate Education in Science Conference and at NSF Atrium Presentation, January 23-25, Washington, DC.
- 2012 American Sociological Association, Annual Meeting, Research Poster, August 17-20, Denver, CO.
- 2011 American Sociological Association, Annual Meeting, Research Poster, August 21, Las Vegas, NV.
 American Library Association, Annual Meeting, Oxford University Press, Booth, June 25, New Orleans, LA.
 Center for Geographical Analysis, Harvard University, 2011 Conference, May 6 and 7, Cambridge, MA.
 CUNY Journalism School, Ethnic Community and Media Census Training, May 5, New York, NY.
 American Association of Public Opinion Research, New York Chapter, April 21, New York, NY.
 Population Association of America, Pre-Conference Session, March 30, Washington, DC.
 National Low Income Housing Coalition, Annual Conference, March 29, Washington, DC.
 Census Bureau, Geography Division, January 28, Washington, DC.
 National Science Foundation NSF Course Curriculum and Laboratory Improvement Program/Transforming Undergraduate Education in Science Conference and at NSF Atrium Presentation, January 26-28, Washington, DC.
 CUNY Journalism School, Making Sense of the Census, January 3, New York, NY.
- 2010 Social Science History Association, Annual Meeting, "Exploring Long Term US Change: Research and Teaching with Social Explorer," November 18, Chicago, IL.
 Jewish Community Relations Council, Community Connections Fellowship Orientation, New York, November 9.
 U.S. State Department, Office of International Visitors. "Changing Demographics and Multiculturalism in the United States." Flushing, NY, September 21.
 American Sociological Association, Annual Meeting, Research Funding Opportunities and Data Resources Poster, August 15, Atlanta, GA.
- 2009 American Sociological Association, Annual Meeting, Research and Data Support Poster, August 8-11, San Francisco, CA.
 Eastern Sociological Association, Annual Meeting, Research Workshop, April 2-5. Baltimore, MD.
- 2008 American Sociological Association, Annual Meeting, Research and Data Support Poster, August 2, Boston, MA.
- 2007 New York Chapter of the American Association of Public Opinion Research, October 4, New York, NY.
 American Sociological Association, Annual Meeting, Research and Data Support Poster, August 12, New York, NY.
 Coalition for the National Science Foundation, U.S. House Office Building Reception, Official Representative of the American Sociological Association, Washington, DC, June 26,
 Pew Research Center, Washington, DC, June 25.
- 2006 National Center for Supercomputing Applications, Invited Conference on Spatial Thinking in the Social Sciences and Humanities," December 18-19, Urbana, IL.
 Annual Meeting of the Social Science History Association, "Social Explorer as a Resource for Teaching," November 2-5, Minneapolis, MN.

SELECTED RECENT PRESENTATIONS (Continued)

11

Annual Meeting of the American Sociological Association, Research Workshop, "Geographical Information Systems (GIS) as a Research Tool for Sociologists," August 11-14, Montreal, Quebec.

Annual Meeting of American Sociological Association, Research and Data Support Poster, August 11-14, Montreal, Quebec...

National Center for Supercomputing Applications, Invited Conference on Spatial Thinking in the Social Sciences and Humanities, December 18-19, Urbana, IL.

GRANTS AND AWARDS**Grants and Awards in Progress**

"Census Analyses for the New York Metropolitan Area." *New York Times* Newspaper Division and CUNY Center for Advanced Technology, 1993-pres. Renewed 9/2018 to 8/2021 (\$317,563)

Grants and Awards Completed

"INSPIRE: Studying and Promoting Quantitative and Spatial Reasoning with Complex Visual Data Across School, Museum, and Web-Media Contexts" Leilah Lyons, Josh Radinsky (University of Illinois Chicago) and Andrew A. Beveridge (Social Explorer, Inc.) . National Science Foundation, Tues-Type 2 Project, Information Technology Research, Discovery Research K-12, Cyberlearning: Transforming Undergraduate Education, Inspire Geography and Spatial Sciences. 2012 to 2016, \$795,000 Total, \$242,000 Sub-Contract to Social Explorer.

"Creating and Disseminating Tools to Teach with Demographic Data Maps and Materials." Andrew A. Beveridge and Josh Radinsky, National Science Foundation, Division of Undergraduate Education, 2009-2013, \$332,896

"Integrated Public Use Microdata Sample Redesign." Subcontract through University of Minnesota from National Institutes of Health R01, 2006-2013 \$175,000.

"Collaborative Research—The National Historical Geographic Information System." National Science Foundation, Sociology Program, 2007-2012, \$99,725 (Continuing Award).

"The Distribution and Social Impact of Mortgage Foreclosures in the United States." Andrew A. Beveridge and Elena Vesselinov, National Science Foundation, Sociology Program, 2009-2010, \$144,995.

"Collaborative Research—Creating Exemplary Curricula and Supporting Faculty Development in Using Social Explorer to Teach with Demographic Data Maps." Andrew A. Beveridge and Joshua Radinsky, National Science Foundation, Division of Undergraduate Education, CCLI, Phase 1, 2006-2008, \$149,970.

"Collaborative Research—A Digital Library Collection for Visually Exploring United States Demographic and Social Change." Andrew A. Beveridge and David Halle, 2002-2007, \$706,746.

"National Historical Geographical Information System." John Adams, Andrew A. Beveridge, et al, Subcontract of National Science Foundation Infrastructure Grant through University of Minnesota, Organize Historical City Based Data, 2001-2006, \$194,000.

"Using Socio-Economic Characteristics of Residents of Student Neighborhoods as a Proxy for Socio-Economic Characteristics of Students: An Assessment Using ECLS-K." National Center for Education Statistic through Educational and Statistical Services Institute, 2004-2005, \$57,958.

"Adding Census 2000 Data and Geographic Location to the ECLS-K Data Set" Andrew A. Beveridge and Sophia Catsambis, National Center for Education Statistic through Educational and Statistical Services Institute, 2002-2003, \$59,335.

"Visualizing and Exploring United States Urban and Rural Social Change, 1790-2000: Interactive Multimedia and Web Based Tools." Andrew A. Beveridge and David Halle, National Science Foundation, Division of Undergraduate Education, Educational Materials Development, 2001-2004, \$418,000.

GRANTS AND AWARDS (CONTINUED)**12**

- "Evaluation of Fighting Back." Leonard Saxe, Charles Kadushin, Andrew A. Beveridge, Robert Wood Johnson Foundation, 1994-2002, \$370,000.
- "Development of a Map and Demographic Data Server," CUNY Software Institute, 2001, \$8,000.
- "Redistricting and Minority Voting Rights in Metropolitan New York." Randolph McLaughlin and Andrew A. Beveridge, 2000-2001, Pace Law School \$90,000 total; Andrew A. Beveridge \$60,000.
- "Mapping and Exploring New York City Change, 1905-2000: A Set of Interactive Web Based Tools." National Science Foundation, 1999-2000, \$78,960.
- "A Laboratory for Integrating Multimedia and World Wide Web Technology into Sociological Instruction." Samuel Heilman, Robert Kapsis, Max Kilger, Dean B. Savage and Andrew A. Beveridge, National Science Foundation, 1996-1998, \$47,846.
- "A Shared Computer Work Station and Storage System for Social Science Research." National Science Foundation, 1996-1997, \$20,964.
- "The Battle for Yonkers and the Dilemma of Desegregation." Presidential Research Award, 1993-1994, One Term Release.
- "Why Do Neighborhoods Change or Stay the Same?" Ford Foundation, Diversity Initiative Grant. 1993, Course Release and Student Stipends.
- "Separate American Dreams Face the Common American Dilemma: The Battle to Segregate Yonkers, New York, 1940-1990." Profession Staff Congress, Research Award Program, 1992-1994, \$6,800.
- "Using the Census for Social Mapping across the Sociology Curriculum." President's Mini-Grant for Innovative Teaching, 1992-1993, \$3,500.
- "Modeling the Results of Union Elections by Developing Standard and Hierarchical Logistical Models." Diane Poland, Andrew A. Beveridge, and Wing-Shing Chan, Probe Program for Grand Challenges in the Social Sciences, National Center for Supercomputing Activities, 1992-1994, Super-Computer Time at National Center.
- "The Introductory Sociology Curriculum Initiative: An Empirical, Scientific Approach." Andrew A. Beveridge, Joanne Miller, Lauren H. Seiler and Dean B. Savage, National Science Foundation, Undergraduate Course and Curriculum Program, 1992-1995, \$160,000.
- "A Computer Laboratory for Quantitative and Scientific Reasoning in Sociology." Andrew A. Beveridge, Joanne Miller, Dean Savage and Lauren H. Seiler, National Science Foundation, Instructional Instrumentation and Laboratory Program, 1991-1994, \$50,825.
- "Socially Mapping the New York Area." Ford Diversity Initiative Grant, 1992, Course Release Time.
- "Development of Research Mentorship and Laboratory in Sociology." CUNY Dean for Research and Academic Affairs, Department Faculty Development Program, 1991-1992, One Course Release Time.
- "Integrating Yonkers." Faculty-In-Residence Award, 1988-1989, One Course Release Time.
- "Credit Allocation and Community Change." Professional Staff Congress CUNY, Faculty Fellowship, 1987, \$6,200.
- "Credit Allocation and Community Change." Professional Staff Congress CUNY, Research Award Program, 1986-1988, \$13,268.
- "A Study of Industrial Development of an Agricultural Community Based Upon Financial Records: Keene and Cheshire County, New Hampshire, 1820-1915." Putnam Foundation, 1985-1988, \$33,000.
- "The Intelligent Work Station in Social Science Research: Development, Evaluation, Instruction and Demonstration." Lauren Seiler and Andrew A. Beveridge, International Business Machines Corporation, Special Study, 1985-1987, \$78,000 of hardware and software, \$17,000 funding.
- "Integrated Software for the Social Research Workstation." Andrew A. Beveridge and Lauren Seiler, Inter-University Consortium for Educational Computing, 1985-1986, \$20,000.

GRANTS AND AWARDS (CONTINUED)

13

- "A Study of the Industrial Development of an Agricultural Community." National Endowment for the Humanities Grant, Basic Research Program, 1984-1985, \$75,000.
- "Credit Allocation and Community Change." Professional Staff Congress CUNY, Research Award, 1984-1985, \$6,973.
- "Credit Allocation and Community Change." Professional Staff Congress CUNY, Research Award, 1983-1984, \$6,928.
- Andrew A. Beveridge and Phoebus J. Dhrymes, "Longitudinal Transformation and Analysis of the Annual Housing Surveys." Department of Housing and Urban Development, 1980-1982, \$248,000.
- "Credit and Social Change: Cheshire County and Its Provident Institution, 1832-1915." American Council of Learned Societies, Fellowship, 1978-1979 \$13,500.
- "The Context of Credit in Wilmington, Delaware, 1800-1870." Regional Economic History Research Center, Eleutherian Mills Hagley Foundation, Grant and Fellow, 1978-1979, \$12,000.
- "Societal Effects of Credit Allocation." National Science Foundation Sociology Program Research Grant, 1976-1978, \$81,781.
- "Social Structure, Social Change and Credit Allocation: A Case Study." National Endowment for the Humanities Summer Stipend, 1976, \$2,000.
- "Social Structure, Social Change and Credit Allocation: A Case Study." American Philosophical Society, Grant, 1976, \$750.
- "African Businessmen in Zambia: Economic, Social and Governmental Impact." Foreign Area Fellowship Program Fellowship, 1970-1971, \$11,400.
- Pre-Doctoral Research Grant. National Institute of Mental Health, 1969-1972, Stipend and Tuition.

OTHER SOCIOLOGICAL RESEARCH ACTIVITIES**Selected Analyses Appearing in *New York Times* and Elsewhere**

Since 1992, Professor Beveridge, Queens College Sociology, and Social Explorer have been cited over 1,000 times in the New York Times, and materials have been syndicated or appeared elsewhere. Other media appearances include NPR, WCBS, WABC, WNBC, WNYW, CUNY-TV, CBS Radio, and the Associated Press.

"Chicago's Murder Problem." *The New York Times*, May 27, 2016. By Ford Fessenden and Haeyoun Park.

"How Every New York City Neighborhood Voted in the Democratic Primary?" *The New York Times*, April 19, 2016. By Matthew Bloch and Wilson Andrews.

"In Chelsea, A Great Wealth Divide." *The New York Times*, October 25, 2015. By Mireya Navarro.

"Move Over Millennials, Here Comes Generation Z." *The New York Times*, September 20, 2015. By Alexis Williams.

"Ten Years After Katrina." *The New York Times*, August 26, 2015. By Campbell Robertson and Richard Fausset

"We're Making Life Too Hard for Millennials," *The New York Times*, August 2, 2015. By Steven Rattner.

"Why the Doorman Is Lonely." *The New York Times*, January 11, 2015. By Julie Stow

"Ceding to Florida, New York Falls to No. 4 in Population." *The New York Times*, December 24, 2014. By Jesse McKinley

"Gap between Manhattan's Rich and Poor Is Greatest in U.S., Census Finds." *The New York Times*, September 18, 2014. By Sam Roberts

"Mostly White Forces in Mostly Black Towns: Police Struggle for Racial Diversity." *The New York Times*, September 10, 2014. By Shaila Dawan

OTHER SOCIOLOGICAL RESEARCH ACTIVITIES (Continued)

14

"No MetroCard Needed." *The New York Times*, May 25, 2014. By Michelle Higgins

"The Three-Seat Strollers," April 10, 2014 - By Hannah Seligson

"Racial Patterns Are Found in Recent School Budget Elections." *The New York Times*, August 25, 2010, Pg. A19. By Sam Roberts.

"In New York, Black and Hispanic Strongholds Become More White. *The New York Times*, December 15, 2010; Pg. A17, By Sam Roberts. (Maps Pg. A17)

"Immigrants Make Paths To Suburbia, Not Cities. *The New York Times*, December 15, 2010 Pg. A15. By Sabrina Tavernise and Robert Gebeloff. (Maps Pg. A1, A16)

"Economic Boom in Washington Leaves Gaping Income Disparities. *The New York Times*, December 18, 2010, Pg. A11. By Sabrina Tavernise and Robert Gebeloff; Sabrina Tavernise.

"A Slice of Queens Where People Who Arrived in 1977 Are Newcomers." *The New York Times*, January 8, 2011 Pg. A15. By Joseph Berger.

"Black? White? Asian? More Young Americans Choose All of the Above. *The New York Times*, January 30, 2011, Pg. A1. By Susan Saulny.

"Smaller New Orleans After Katrina, Census Shows." *The New York Times*, February 3, 2011. By Campbell Robertson. (Includes maps and graphics.)

"For City Parents, a Waiting List for Nearly Everything." *The New York Times*, February. 22, 2013, By Soni Sangha.

"A Survey of the Flooding in N.Y.C. After the Hurricane." *The New York Times*, Nov. 21, 2012.

"New York Led Country in Population Growth Since 2010 Census." *The New York Times*, June 28, 2012. By Sam Roberts.

"BIG CITY--Offspring Who Cling To the Nest." *The New York Times*, June 24, 2012 - By Ginia Bellafante.

"100 Years Of Staying Put." *The New York Times*, April 27, 2012 - By Benjamin Weiser and Noah Rosenberg.

"Born Abroad, Well Off and Using Public Schools." *The New York Times*, February 14, 2012. By Kirk Semple.

"Solo in America" .*The New York Times*, February 5, 2012 - By Bill Marsh and Amanda Cox.

"Detroit Census Figures Confirm A Grim Desertion Like No Other." *The New York Times*, March 23, 2011 Wednesday, Pg. A1. By Katharine Q. Seelye.

"Non-Hispanic Whites Are Now a Minority in the 23-County New York Region." *The New York Times*, March 28, 2011, Pg. A19. By Sam Roberts.

"Cougars Aren't Mythical." *The New York Times*, October 15, 2009, Pg. C1. By Sarah Kershaw.

"Five-Year-Olds at the Gate: Why are Manhattan's elementary schools turning away kindergartners? How the Bloomberg administration missed the baby boom it helped create." *New York Magazine*, June 1, 2009. By Jeff Coplon.

STUDIES CONNECTED WITH LEGAL CASES**Legislative Districting and Redistricting (Including Plans for Jurisdictions and for Community Groups)**

Center for Law and Social Justice, Medgar Evers College and Newman, Ferrara. *Favors v. Cuomo, et al.*, U.S. District Court for the Eastern District of NY (Hearing Testimony, 2012).

Frederick Brewington and Randolph McClaughlin, *Melvin Boone, et al., vs. Nassau County Board of Legislators, et al.* U.S. District Court for the Eastern District of New York. Produced report and plan and testified in trial regarding redistricting of Nassau County Legislature. 2011

Westchester County Board of Legislators, Plan for Redistricting Westchester County, Adopted May 17, 2011.

STUDIES CONNECTED WITH LEGAL CASES (Continued)

15

City of New Rochelle. Plan for Redistricting City Council Districts. Adopted May 10, 2011.

United States Department of Justice. *United States v. Port Chester*. U.S. District Court for the Southern District of New York. Investigation, Voting Analysis, Analysis of Potential Plans, Reports and Declarations, Testimony, 2002-2009. Cited in Opinion.

Emery, Celli, Curti, Brinkerhoff and Abadi. *Rodriguez v. Pataki*. U.S. District Court for the Southern District of New York. Reports, affidavits, deposition testimony and trial testimony related to claims about the State Senate Redistricting Plan in New York State, 2002-2004. Decided.

Randolph McLaughlin, Esq. *New Rochelle Voter Rights Committee, et al vs. New Rochelle, et al*. U.S. District Court for the Southern District of New York. Plaintiff's redistricting plan, affirmation, report, trial testimony, negotiated redistricting plan, settlement hearing testimony, 2003-2005. Decided and Settled.

Frederick Brewington, Esq., *Montano v. Suffolk County Board of Legislators*. U.S. District Court for the Eastern District of New York. Produced report and plan and testified in trial regarding proposed redistricting of Suffolk County Legislature. Cited in District Court Opinion, 2003. Decided.

City of Yonkers. Plan for the Redistricting the City Council. Adopted June 24, 2003.

Center for Constitutional Rights and Social Justice Center, Pace University Law School. *Goosby v. Town Board of Hempstead*. U.S. District Court for the Eastern District of New York. Designed and presented plaintiff's plan for districting the Town of Hempstead, a community of 720,000. Created single member district plan using census data and boundary files. Submitted plan including maps and data and testified at trial. Court ordered plan; affirmed by 2nd Circuit; Supreme Court denied certiorari. Plan and testimony cited in District Court and 2nd Circuit opinions. 1995-1997.

Connecticut Civil Liberties Union. *Coalition for Fair Representation, et al v. City of Bridgeport, et al*. U.S. District Court for the District of Connecticut. Analysis of segregation patterns in Bridgeport Connecticut. Affidavit and maps filed. Cited in 2nd Circuit Decision. 1993-1994.

Berger, Poppe, Janiec. *Diaz, et al v. City of Yonkers*. U.S. District Court for the Southern District of New York. Prepared redistricting plan for the Yonkers City Council, met with plaintiffs and defendants and in court. Plan accepted by City Council and District Court. 1992-1993.

Housing Discrimination, Affirmative Steering, Rent Stabilization and Affordability, etc.

Covington and Burling and Washington Lawyers' Committee for Civil Rights and Urban Affairs. *Adrian Borum, et al v. Brentwood Village, LLC, et al.*, United States District Court for the District of Columbia. 2016-present (Report, Declaration, and Deposition.)

Anti-Discrimination Center. *Janell Winfield et al v. The City of New York et al*. Case Number 15-cv-5236. United States Court for the Southern District of New York. 2017-- (Preliminary Report, Declaration).

Relman, Dane and Colfax, *Westchester Residential Opportunities, Inc., et al v. Clinton Terrace LP, et al.* Case Number 7:16-CV-09273-VB, 2017 (Report).

Bierman and Associates. *Akagi v. Turin HDFC et al*, United States Court for the Southern District of New York. 2016-Present (Report Deposition, Rebuttal Report.)

New York State Attorney General .*Eric T. Schneiderman, As Attorney General of the People of the State of New York v. Evans Bancorp, Inc. et al*. United States District Court for the Western District of New York. 2014-2015 (Report, Settled 2015)

United States Department of Justice. *United States v. City of New Orleans*, Case No. 12-cv-2011. United States District Court for the Eastern District of Louisiana. 2013-2014. (Report and Deposition, Settled 2014)

United States Department of Justice. *City of Joliet, v. Mb Financial Bank, N.A, et al, and United States v. City of Joliet* United States District Court for the Northern District of Illinois. Report and Deposition, Trial Testimony, 2012-2013. United States Department of Justice. Settled.

STUDIES CONNECTED WITH LEGAL CASES (Continued)

16

United States Department of Justice. *United States v. St. Bernard Parish*. United States District Court for the Eastern District of Louisiana. Report. Settled.

Disability Rights California. Analysis of Proposed City Council Group Home Zoning Law in Los Angeles. Report and Letter. 2012.

Relman and Dane. *Ex rel. Curtis Lockey, et al v. City of Dallas, et al.*, 3:11-CV-354-. United States District Court for the Northern District of Texas. Two Reports. Dismissed. 2012-2013.

Marin Goodman, LLP. *Fair Housing Justice Center, Inc., et al, v. Silver Beach Gardens Corporation, et al.* United States District Court for the Southern District of New York. Report and Deposition, 2011.

Foley and Lardner and U.S. Department of Justice. *MSP Real Estate, Inc., et al., v. City of New Berlin, et al.*, and *United States v. City of New Berlin*, U.S. District Court for the Eastern District of Wisconsin; Report, 2011. (Settled 2011.)

Foley and Lardner. *Bear Development LLC v. City of Kenosha and Redevelopment Authority of the City of Kenosha*, U.S. District Court for the Eastern District of Wisconsin. Report and Deposition Testimony, 2011. (Settled 2011.)

Hofstra University, School of Law, Law Clinic. *Isidoro Rivera, et al v. Incorporated Village of Farmingdale, et al.* U.S. District Court for the Eastern District of New York. Report. 2009-2014. Settled.

Skadden, Arps, Slate, Meagher & Flom. *Fair Housing in Huntington Committee, et al v. Town of Huntington, New York, et al.* U.S. District Court for the Eastern District of New York. Report and Rebuttal Report. 2010. (Decided 2010.)

South Brooklyn Legal Services. *Barkley v. United Homes LLC. et al.*, U.S. District Court for the Eastern District of New York, Report, Deposition and Trial Testimony. 2009-2011. (Jury Verdict 2011.)

Relman and Dane. *Anti-discrimination Center of Metropolitan New York v. County of Westchester, et al.* U.S. District Court for the Southern District of New York. Report, Rebuttal Report and Deposition Testimony, 2008-2009. (Settled 2009.)

Sullivan & Cromwell. *Vargas, et al v. Town of Smithtown.* U.S. District Court for the Eastern District of Long Island. Report. 2008. (Settled 2008.)

Southern New Jersey Legal Services. *Mount Holly Gardens Citizens in Action, Inc., et al v. Township of Mt. Holly, et al.* U.S. District Court for the District of New Jersey. Declaration, 2008 and 2010. (Summary Judgment Reversed by 3rd Circuit, Certiorari Pending))

The Advancement Project. *Anderson, et al v. Jackson, et al.* U.S. District Court for the Eastern District of Louisiana. Report and Deposition re: Public Housing Demolition in New Orleans, 2007. (Decided 2007).

Three Rivers Legal Services and Southern Legal. *Helene Henry, et al v. National Housing Partnership.* U.S. District Court for the Northern District of Florida, Gainesville, Division. Three reports and deposition Testimony. 2007-2008. (Settled 2008.)

Legal Services of Southern New Jersey. *Bergen Lanning Residents in Action, et al. vs. Melvin R. "Randy" Primus, et al.* Superior Court of New Jersey, Law Division, Camden County Report re: Bergen Square Redevelopment in Camden, NJ. 2005. (Decided 2005.)

Legal Services of Southern New Jersey. *Cramer Hill Residents Association, et al. vs. Melvin R "Randy" Primus, et al.* Superior Court of New Jersey, Law Division, Camden County. Report re Cramer Hill Redevelopment in Camden, NJ. 2005. (Decided 2005.)

Legal Services of Southern New Jersey. *Citizens In Action, et al. vs. Township of Mount Holly, et al.* Superior Court of New Jersey, Law Division, Burlington County. Report and Certification re: Redevelopment of the Gardens in Mount Holly. 2005. (Decided 2005.)

Legal Services of Southern New Jersey. *Hispanic Alliance, et al. vs. City of Ventnor, et al.* Superior Court of New Jersey, Law Division, Atlantic County Report and Testimony re: Ventnor Redevelopment. 2005. (Settled 2005.)

STUDIES CONNECTED WITH LEGAL CASES (Continued)

17

Legal Services of New Jersey. *Connie Forest, et al vs. Mel Martinez, et al.* Superior Court of New Jersey, Law Division, Essex County. Report re: Brick Towers Demolition in Newark. 2003-2006. (Decided 2006.)

Legal Services of Southern Florida, *Reese v. Miami-Dade County Housing Authority*, Analysis of Relocation of Public Housing Tenants. U.S. District Court for the Southern District of Florida. Report and Testimony at Trial. Cited in District Court Opinion. 2001-2003, and 2009. (Decided 2003, 2009.)

City of Long Beach, *Walton v. City of Long Beach*. Analyzed the vacancy rate in the City of Long Beach for 1992 through 2000. Filed affidavits in state and federal court. Testified in proceedings. Carried out various studies related to vacancy rate. 1997-2000. (Decided 2000, Reversed by Appellate Court.)

Arnold and Porter. *Witt, et al v. New York State Board of Elections*. Analyzed those who have two or more domiciles where they regularly reside for case involving voting in more than one local election. 2000-2002. (Decided 2002.)

Coral Ortenberg Zeck and Condispoti. *Village of Spring Valley v. Town of Clarkstown*. Analyzed the affordability of housing in Rockland County New York for a case involving the annexation of a parcel to build such housing. Testified at trial. 2000. (Decided 2000.)

United States Justice Department, Civil Rights Division. *United States vs. Tunica Mississippi School District*. Analyzed proposal to build a new school near the Casino development in Tunica Mississippi, which was desegregated by order in 1971. 1999-2000. (Decided 2000.)

New York City Environmental Justice Alliance. *New York City Environmental Justice Alliance, et al. v. Rudolph W. Giuliani, et al.* Filed an affidavit that analyzed the racial and Hispanic distribution of the various community gardens for sale and not-for-sale in New York City in 1999. Decided, Cited in the 2nd Circuit opinion.

Connecticut Civil Liberties Union, Center for Children's Advocacy, NAACP Legal Defense Fund, and the Puerto Rican Legal Defense and Educational Fund. *Sheff v. O'Neil*. Analyzed the changing patterns of school enrollments in the Hartford area for this landmark case. Supplied a series of exhibits used by plaintiffs. 1998. (Decided.)

Connecticut Civil Liberties Union and National Association for the Advancement of Colored People. *NAACP v. Milford*. Analyzed historical housing and segregation patterns in the Milford region, and provided disparate impact analysis for not providing low-income housing as agreed. 1997-1998. (Settled 1997.)

Connecticut Civil Liberties Union and Puerto Rican Legal Defense Fund. *Pitts v. Hartford*. Analyzed placement of low-income public housing tenants in wake of destruction of public housing. Case settled. 1997.

American Civil Liberties Foundation of Maryland. *Carmen Thompson, et al. vs. U.S. Department of Housing and Urban Development, et al.* Analysis of various proposed plans for the relocation of public housing tenants throughout the Baltimore metropolitan area. Created a series of maps and analyses. Prepared trial testimony. Consent Decree Entered, April 1996.

Gurian and Bixon; Davis, Polk and Wardwell. *Open Housing Center, Inc. vs. Kings Highway Realty, a Division of Provenz Realty Corp.; Provenz Realty Corp; Diane Provenz; Evelyn Cannon; and Barbara Noonan*. Analyzed real estate "tester" data and apartments that various clients were shown. Imputed racial status of clients by using GIS techniques. Prepared affidavit. Cited in judge's opinion denying summary judgment. 1994-1996. (Settled, 1996.)

Westchester Legal Services and Sullivan and Cromwell. *Carol Giddins, et al v. U.S. Department of Housing and Urban Development, et al.* Analyzed various proposed plans to end racial steering of Section 8 tenants to South West Yonkers. Maps and analyses incorporated into consent decree, and still in use in placing tenants. 1992-1994 and continuing.

Metropolitan Action Institute. *Analysis of Housing Segregation Patterns in Yonkers, New York and Starrett City, Brooklyn, 1983-1984.* (Materials Used for Testimony of Paul Davidoff.)

STUDIES CONNECTED WITH LEGAL CASES (Continued)

18

Federal Court Jury System Challenges (All Cases Decided.)

Andrea Hirsch, *Martinez v. Kelly*. U.S. Appeals Court for the Second Circuit. Analyzed effects of peremptory challenges for *habeas corpus* petition. 2006-2007.

Stern Shapiro Weissberg & Garin. *United States v. Darryl Green, et al.* U.S. District Court for the Eastern District of Massachusetts. Analyzed jury selection system for using Census data, local lists and other materials. Filed seven declarations and testified twice. 2004-2006.

Federal Public Defender, Eastern District of LA, New Orleans, LA. *United States v. Torres*. Analyzed jury selection system for the Eastern District of Louisiana based upon Census Data and Estimates, as well as filings in the Eastern District. Declaration filed. 2006.

Federal Public Defender, Eastern District of LA, New Orleans, LA. *United States v. Caldwell*. Analyzed jury selection system for the Eastern District of Louisiana based upon Census Data and Estimates, as well as filings in the Eastern District. Declaration filed. 2006.

Federal Public Defender, Western District of PA, Pittsburgh. *United States v. Lawrence Skiba*. Analyzed jury selection system for the Pittsburgh Division of the Western District of Pennsylvania based upon Census Data and Estimates, as well as filings in the Western District. Affidavit filed. 2004.

Federal Public Defender, Western District of PA, Pittsburgh. *United States v. Miner*. Analyzed jury selection system for the Pittsburgh Division of the Western District of Pennsylvania based upon Census Data and Estimates, as well as filings in the Western District. Affidavit filed. 2002.

Federal Public Defender, Western District of PA, Erie, PA. *United States v. Rudolph Weaver*. Analyzed jury selection system for the Pittsburgh Division of the Western District of Pennsylvania based upon Census Data and Estimates, as well as jury lists and voting. Affidavit Submitted 2001, Testified.

Newman Schwartz and Greenberg. *United States v. Albert J. Pirro, Jr.* Filed affidavit that analyzed representation in master jury wheel for White Plains and Foley Square Court Houses in the Southern District using census data with respect to the dilution of Italian Americans likely to be on a jury, if venue changed from White Plains to Foley Square. Venue change motion was denied. 2000.

Polstein, Ferrara, Dwyer and Speed and Stephen P. Scaring. *United States v. Dennis McCall, Trevor Johnson*. Analyzed representation in master jury wheel for White Plains Court House in the Southern District. Filed affidavit, which was cited in judge's opinion. 1998.

Curtis, Mallet-Prevost, Colt and Mosle, *United States v. Don King and Don King Productions*. Analyzed representation in master jury wheel for New York City Courthouse in the Southern District. Affidavit and Consulting. 1997-1998.

Dominick Porco. *United States v. Kevin Veale*. Analyzed representation in master jury wheel for White Plains Court House in the Southern District. Filed affidavit. 1997.

Diarmuid White, *United States v. Jose Reyes, et al.* Analyzed representation in master jury wheel for New York City Courthouse in the Southern District. Report and testimony in case cited in the judge's opinion. 1996.

State Court Jury System Challenges (All Cases Decided.)

Joseph Flood and Steven Malone. *State of Arkansas v. Daniel Pedraza Munoz*, Declaration. 2013.

Fitch Richardson, *Commonwealth of Virginia v. Prieto*. Fairfax County Virginia Circuit Court. Affidavit and Trial Testimony, 2010.

Capital Defenders Office, Atlanta GA. *State of Georgia vs. Jason McGhee*. Forsyth County Georgia State Court. Trial Testimony, 2010.

Public Defenders Office and Joseph Flood, *Commonwealth of Virginia v. Sanchez*. Prince William County Virginia Circuit Court. Analyzed Jury Selection in Prince William County, VA. Affidavit, 2008.

STUDIES CONNECTED WITH LEGAL CASES (Continued)

19

Ferrell Law, *Commonwealth of Virginia v. Alan*. Prince William County Virginia Circuit Court. Analyzed Jury Selection in Prince William County, VA. Affidavit, 2008.

New Hampshire Public Defender, *New Hampshire v. Addison*. Hillsborough County, New Hampshire, North Division, Superior Court. Declaration, Deposition and Testimony, 2008.

Public Defenders Office, *Commonwealth of Virginia vs. Portilla-Chicas*. Stafford County Virginia Circuit Court. Analyzed Jury Selection in Stafford County, VA. Affidavit, 2006.

Virginia Indigent Defense Commission, *Commonwealth of Virginia vs. Rogers*. Stafford County Virginia Circuit Court. Analyzed Jury Selection in Stafford County, VA. Report and Testimony, 2006.

Criminal Legal Clinic of Syracuse University Law School, *People v. Tyisha Taylor*. Syracuse City Court. Analyzed Jury Selection System for Syracuse and Onondaga County, New York. Testimony, 2005.

Capital Defenders Office, *New York State v. Sweat*. Analyzed representation in jury selection in Broome County, New York. Two affidavits filed, one relating to factors likely to lead to underrepresentation of African Americans in Jury Pool, another related to the operation of the allocation of jurors among courts in Broome County. (Capital Murder Case.) 2003

Michael J. Spiegel, *New York State v. Dennis Salvador Alvarez-Hernandez*, Analyzed representation in jury selection in Westchester County, New York. Analysis based upon census data and estimates, and an emulation of the reported jury selection process using voter lists and other sources. Filed affidavit reporting results. (Capital murder case.) 2001--2003

Capital Defenders Office, *New York State v. Taylor*. Analyzed representation in jury selection in Queens County, New York. Analysis based upon census data and estimates, and an emulation of the reported jury selection process using voter lists and other sources. Filed affidavit reporting results; testified at hearing. Produced demographic analyses by town to assist in jury selection. Testified in 2002. (Capital murder case.) 2000-2002

Mann and Mitchell, *State of Rhode Island vs. David Tremblay*. Analyzed representation in jury selection in Bristol and Providence Counties, Rhode Island. Affidavit filed that includes an analysis of the geographic, racial, and Hispanic representation of jurors in counties in Rhode Island and includes an estimate of the disparities by race and Hispanic status. 1999-2001.

Capital Defenders Office, *New York State v. McCoy*. Analyzed representation in jury selection in Suffolk County, New York. Analysis was based upon census data and estimates, and an emulation of the reported jury selection process using voter lists and other sources. Filed affidavit reporting results. Produced demographic analyses by town to assist in jury selection. (Capital murder case.) 1997-1998.

Reynolds, Caronia and Gianelli. *New York State v. Robert Shulman*. Analyzed representation in jury selection in Suffolk County, New York. Analysis was based upon census data and estimates, and an emulation of the reported jury selection process using voter lists and other sources. Filed affidavit reporting results. (Capital murder case.). 1997. Opinion reproduced in *New York Law Journal*.

Capital Defenders Office, *New York State v. Gordon*. Analyzed representation in jury selection in Queens County, New York. Analysis was based upon census data and estimates, and an emulation of the reported jury selection process using voter lists and other sources. Filed affidavit reporting results. (Capital murder case.) 1997. Opinion reported on and reproduced in *New York Law Journal*.

Capital Defenders Office, *New York State v. Sam Chinn, III*. Analyzed representation in jury selection in Onondaga County. Affidavit filed that presented an analysis of the geographic, racial, and Hispanic representation of jurors. It includes an estimate of the disparities by race and Hispanic status. Plea bargain offered and accepted. Discussed at presentation at the New York State Defenders Association, Glen Falls, NY. (Capital murder case.) 1997.

Capital Defenders Office, *New York State v. George Bell*. Analyzed representation in jury selection in Queens County, New York. Analysis was based upon census data and estimates, and

STUDIES CONNECTED WITH LEGAL CASES (Continued)

20

an emulation of the reported jury selection process using voter lists and other sources. Filed affidavit reporting results. (Capital murder case.) 1996-1997.

Capital Defenders Office, *New York State v. Hale*. Analyzed representation in jury selection in Kings County, New York. Analysis was based upon census data and estimates, and an emulation of the reported jury selection process using voter lists and other sources. (Affidavit reporting results, capital murder case.) 1996-1997.

Employment Discrimination

Division of Human Rights, *New York State, DHR v. International Longshoremen Association, et al.* Case# 10156672. 2017-present. (Report, testimony, rebuttal report, rebuttal testimony).

Shneyer and Shen. *Grimston vs. Marsh and McLanahan*. Analyzed employment patterns based upon Census data and defendant records. Filed expert report and testified in deposition. Case Settled. 1998-2000.

Shneyer and Shen. *Maglasang vs. Beth Israel Medical Center*. Analyzed employment patterns based upon Census data and defendant records. Filed expert report and testified in deposition. Case Settled. 1999-2000.

Shneyer and Shen. *Williams vs. Safesites, Inc.* Analyzed employment patterns based upon Census data and defendant records. Filed expert report. 1998. Decided.

Shneyer and Shen. *Lachica vs. Emergency Medical Services*. Analyzed employment patterns based upon Census data and defendant records. Case Settled. Filed expert report. Case Settled. 1996-1997.

Other Legal Projects

Center for Constitutional Rights, *Aref, et al v. Holder* (now Sessions). (Report, Deposition 2013-present)

Dewey & LeBoeuf (transferred to Winston, Strawn) and Latino Justice (PRLDEF). *Adriana Aguilar, et al., v. Immigration and Customs Enforcement, Division of the United States Department of Homeland Security, et al.* U.S. District Court for the Southern District of New York. Report, Rebuttal Report and Deposition Testimony, 2010-2012. Settled 2013.

Debevoise & Plimpton; *Five Borough Bicycle Club, et al v. City of New York, et al.* U.S. District Court for the Southern District of New York. Summoning Patterns Regarding Critical Mass Rides in Manhattan. Report, Deposition and Trial Testimony, 2008-2009. Decided.

Rabinowitz, Boudin, Standard and Krinsky, *Garrison v. I.R.S.* U.S. District Court for the District of Columbia. Filed expert report and testified at trial. Analysis based upon a survey of a sample of all synagogues in the United States. 1991-1992. Settled.

OTHER MAJOR STUDIES AND ANALYSES

Time-Warner Cable of New York. Analyzed and provided maps with underlying ethnic and racial composition for each of the six cable systems managed by Time-Warner Cable in Manhattan, Queens and Brooklyn, 1998-1999 (Proprietary).

New York Times. Analyzed circulation patterns of *the New York Times* in connection with their launch of the Boston and Washington editions, 1996-1997 (Proprietary).

Newspaper Association of America. Analysis of Field Experiment of Full-Color Run of the Press Advertisements in Richmond, Virginia, 1992.

Newspaper Advertising Bureau. Analysis of a Panel Study of Change in Newspaper Readership among Young Adults, 1983-1984.

Friends of Vincenza Restiano. Political Consulting, Polling, and Voting Analysis, Computer Based Voter List Organization, 1983, 1985, 1987, and 1991.

Abt Associates, through Center for the Social Sciences, Columbia University. Transfer of Annual Housing Survey Project to Abt, 1982.

OTHER ACTIVITIES

21

Response Analysis Corporation, Princeton, N.J. Problems in Reliability of Longitudinal Household Surveys. 1982.

PROFESSIONAL MEMBERSHIPS AND ACTIVITIES

Future Directions in Spatial Demography Specialist Meeting. Invited participant. Convened by the University of California, Santa Barbara, Penn State University, and NIH Advanced Spatial Analysis Training Program (NICHD 5R-25 HD057002-04) Santa Barbara, CA December 12-13, 2011.

Editorial Board Member, Spatial Demography, 2012-pres.

American Sociological Association: Member, Park Award Committee, 2013; Search Committee, Editor of City and Community; 2008-2009; Organizer, sessions on Applied and Evaluation Research, 1998; Organizer, special session on New York Trends, 1996; Organizer, sessions on Economy and Society, 1984; Organizer, sessions on Social Change, 1979.

National Science Foundation

Review Panel Member: Transforming Undergraduate Education in Science, (also Course Curriculum and Laboratory Improvement) 2011, 2010, 2007, 2006, 2005, and other earlier years; Cyber Discovery of Innovation, 2011; Math Science Partnership, 2009.

Advisory Board Member: School Attendance Boundary Information System (SABINS), 2009 to present.

Advisory Workshop Member, General Social Survey (GSS): The Next Decade and Beyond, 2007; Future Investments in Large-Scale Survey Data Access and Dissemination, 2010.

Occasional Reviewer, NSF Sociology Program.

Occasional Reviewer, American Sociology Review, American Journal of Sociology, Sociological Forum, and other journals

Eastern Sociological Society: Vice President 1997-1998; Program Committee, 1991-1992; Co-Chair, Computer Committee, 1985-1987; President and Discussant, Women's History Session, 1985; Member, Computer Committee, 1984-1985; Coordinator, Computer Workshops, 1984 Annual Meeting; Co-Chair, Membership Committee, 1983-1984; Member, Papers Committee, 1983-1986; President, Historical Sociology Session, 1983; Co-Chair, Papers Committee, 1982-1983; Chair, Membership Committee, 1981-1982; Co-Chair, Conference Committee, 1980-1981.

American Association for Public Opinion Research: Program Committee, 1983-84; Nominating Committee, 1985-1986; Task Force Regarding the Use of Survey-based Evidence in Legal Proceedings, 2010.

New York Chapter, American Association for Public Opinion Research, Associate Program, Chair 2006-07; Program Chair, 2007-08.

International Sociological Association, Research Liaison Committee on Economy and Society

American Economic Association

Social Science History Association

Population Association of America

COURSES TAUGHT

Graduate: (M.A. and Ph.D.) Demography; Computer Applications in the Social Sciences; Advanced Social Statistics; The Sociological Study of Economies; Logic of Social Research; Survey Research Methods; Co-Operative Education Field Placement; Demography; Integrated Social Research; Ph.D. Dissertation and M.A. Thesis Supervision.

Undergraduate: New York City in Your Neighborhood; The Digital Transformation of Everyday Life; Social Change in the City; Methods of Social Research; Sociology of Economic Life; Third World in Social Change; Social Statistics; Sociological Analysis; New York Area Undergraduate Research Program (at Columbia): Housing Crisis in New York City, Equity of the Criminal Justice System, Implementation of No-Fault in New York.

COURSES TAUGHT (Continued)

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UNIVERSITY, COLLEGE AND DEPARTMENTAL ACTIVITIES

CUNY Podcast, 2011, Assessing the Census

CUNY Forum on CUNYTV, October 27, 2009; April 20, 2011, and May 5, 2012,

CUNY Research Foundation, Faculty Advisory Committee, 2006-2017 Board of Directors, 2006-2017.

CUNY Professional Staff Congress, Legislative Committee, 2000-2001; CUNY, University Committee on Research Awards, 1988-1991; CUNY, University Computer Policy Committee, 1986-1987; CUNY/PSC Sociology Research Award Panel, 1986-1987; Graduate Center Sociology Program, Chair, Search Committee, 1989-1990; Methods Subcommittee, 1986-1987; Computers Committee, 1987-1990.

Queens College, Committee on Fellowship Leave, 1990-1991; Queens College, Committee on Research and Sponsored Programs, 1982-1986; Ad Hoc Computer Committee, Division of Social Sciences, 1982-1986, 1994-1996, 1998-pres.; Official Representative to the Inter-University Consortium for Political and Social Research (ICPSR), 1983--; Workload Committee, 2007-09; Executive Committee of College Personnel and Budget Committee, 2006-2011

Queens College, Department of Sociology, Chair 2006-18; Computer Committee, 1981-2005. (Chair most years); Queens College, Departmental M.A. Program Committee, 1981-2005 (Director and Chair, 1982-1987, 2001-2003, 2004-2006).

CIVIC AND COMMUNITY ACTIVITIES

Yonkers Board of Education, Trustee 1986-1990. President, 1988-1989. Chair, Policy Committee, 1989-1990; Chair, Spelling Bee Committee, 1986-1988.

Yonkers Democratic Party, Second Vice-Chair and District Leader, 1991-1992; District Leader, 1993-1995.

Council of Large City School Districts, 1986-1991. Executive Committee, 1990-1991; Committee on School Choice, 1991; Lobbying Committee, 1989-1990.

New York State School Boards Association, Member Federal Relations Network, 1989-1990.

Long vale Homeowners Association, Board of Directors, 1983-1985. President 1985.

Yonkers Private Industry Council, 1988-1990. Chair, Program and Planning Committee, 1989-1990.

Founding Member and Vice-President, Citizens and Neighbors Organized to Protect Yonkers (CANOPY), 1987-1992.

Volunteer, Friends of Nicholas Wasicsko, 1989 and 1991.

Volunteer, Friends of Vincenza Restiano, 1983, 1985, 1987, and 1991.

Volunteer, Friends of Terence Zaleski, 1991.

168 Rental Project Universe				Excluded 1- & 2- Unit Rental Projects	Excluded 100% Community Preference Projects
1	98	176	248	30	294
2	99	179	250	78	308
4	100	180	251	97	
5	102	181	253	119	
7	105	182	255	122	
8	106	183	256	139	
9	107	185	257	144	
10	108	186	258	174	
11	109	188	260	187	
12	110	189	261	200	
13	111	192	262	203	
14	114	193	263	217	
16	115	194	267	266	
17	116	195	268	288	
18	117	196	269	312	
19	118	198	270		
20	120	199	271		
21	121	201	272		
22	124	202	275		
23	125	206	276		
24	126	208	277		
25	131	210	278		
27	132	211	279		
28	133	212	281		
29	135	215	284		
75	136	216	285		
80	137	218	286		
82	138	219	287		
83	140	220	289		
84	141	222	290		
85	142	223	298		
86	145	224	299		
87	146	225	300		
88	147	226	301		
89	148	229	304		
90	149	230	310		
91	150	231	311		
92	170	232	313		
93	171	234	315		
94	172	236	316		
95	173	237	317		
96	175	247	320		

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Protective Order (ECF 82)

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Protective Order (ECF 82)

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Protective Order (ECF 82)

Exhibit 9 – Distribution of NYC White Population by Census tract and CD boundaries overlaid (2013-17 ACS)

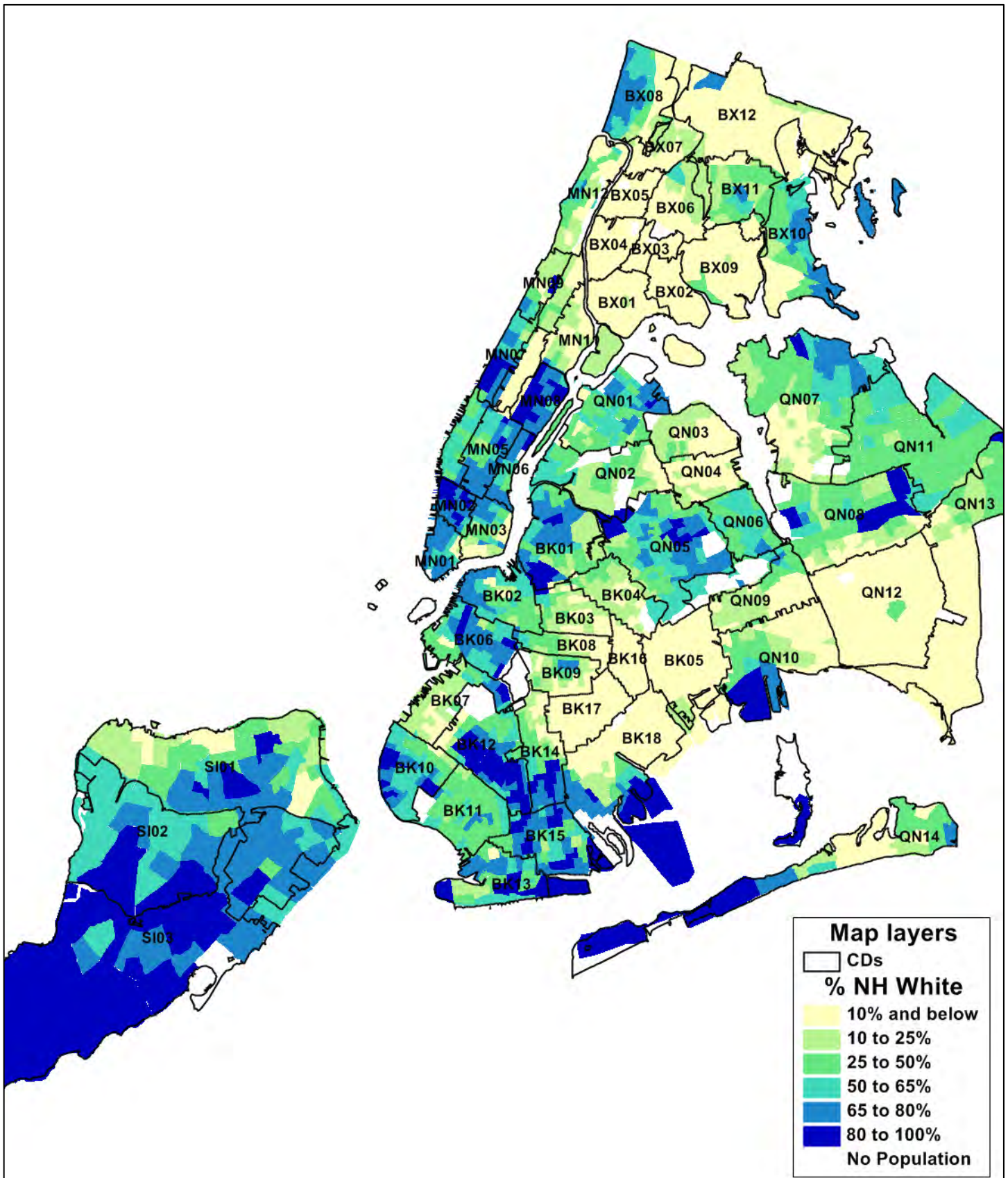


Exhibit 10 – Distribution of NYC Black Population by Census tract and CD boundaries overlaid (2013-17 ACS)

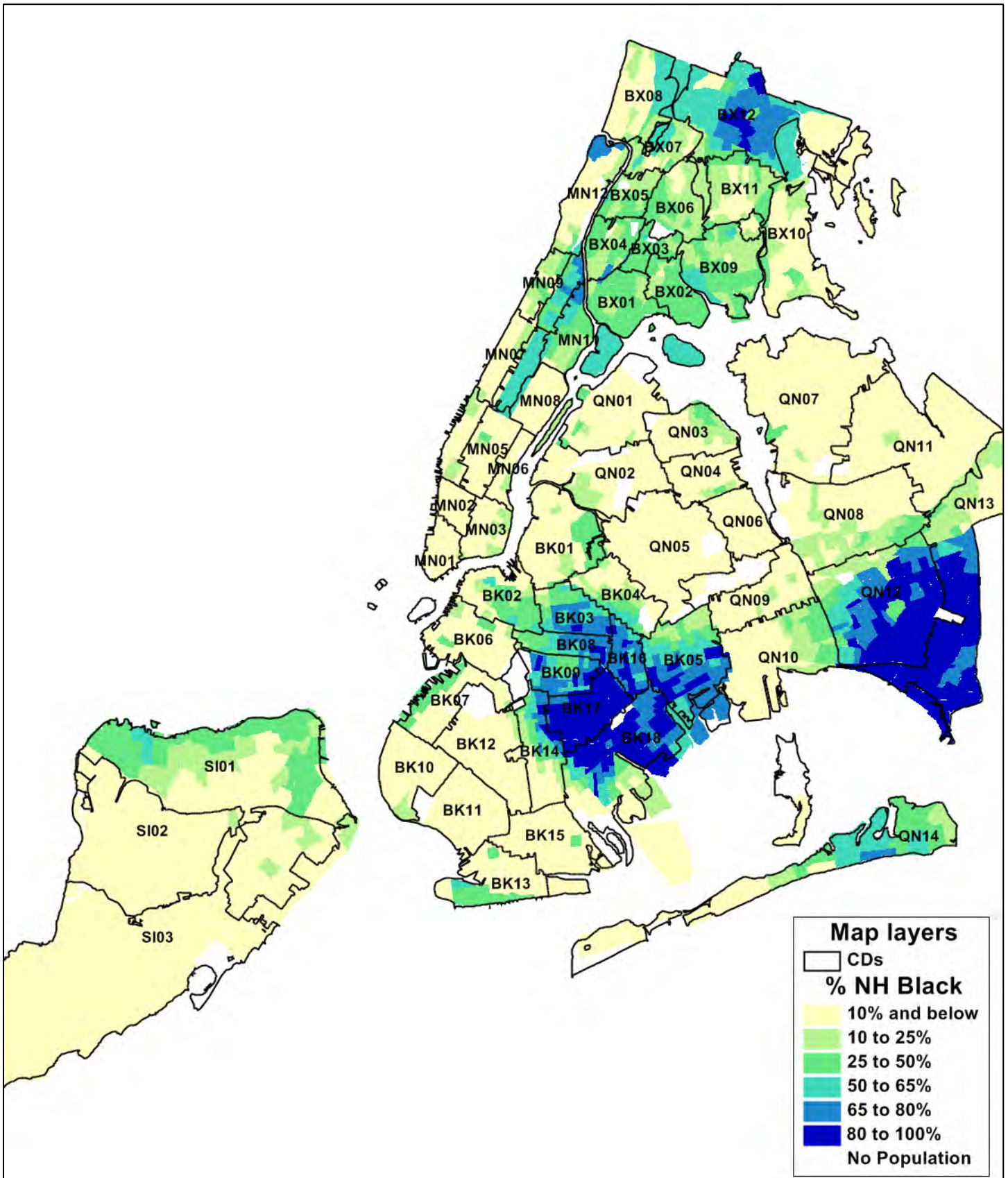


Exhibit 11 – Distribution of NYC Hispanic Population by Census tract and CD boundaries overlaid (2013-17 ACS)

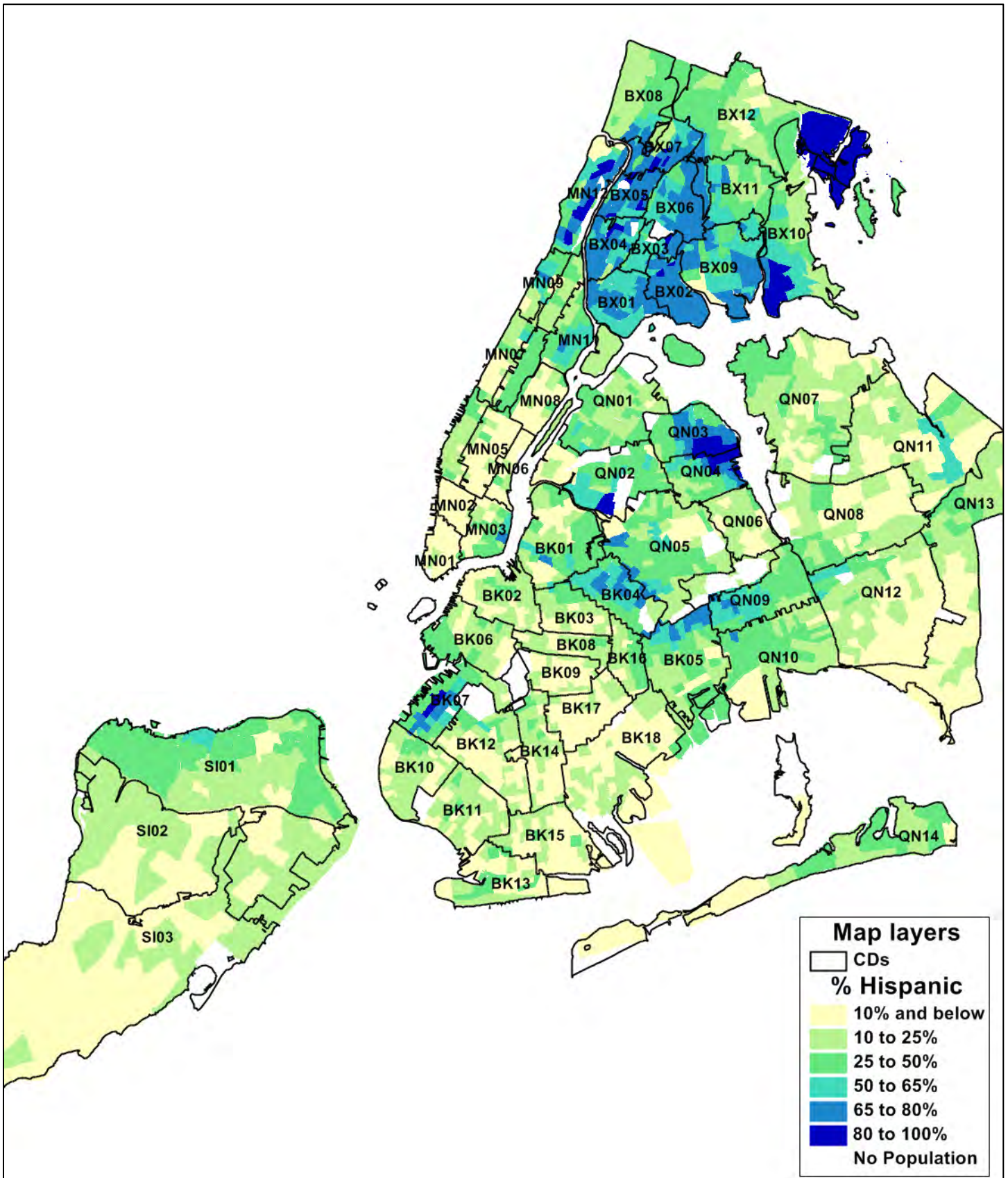
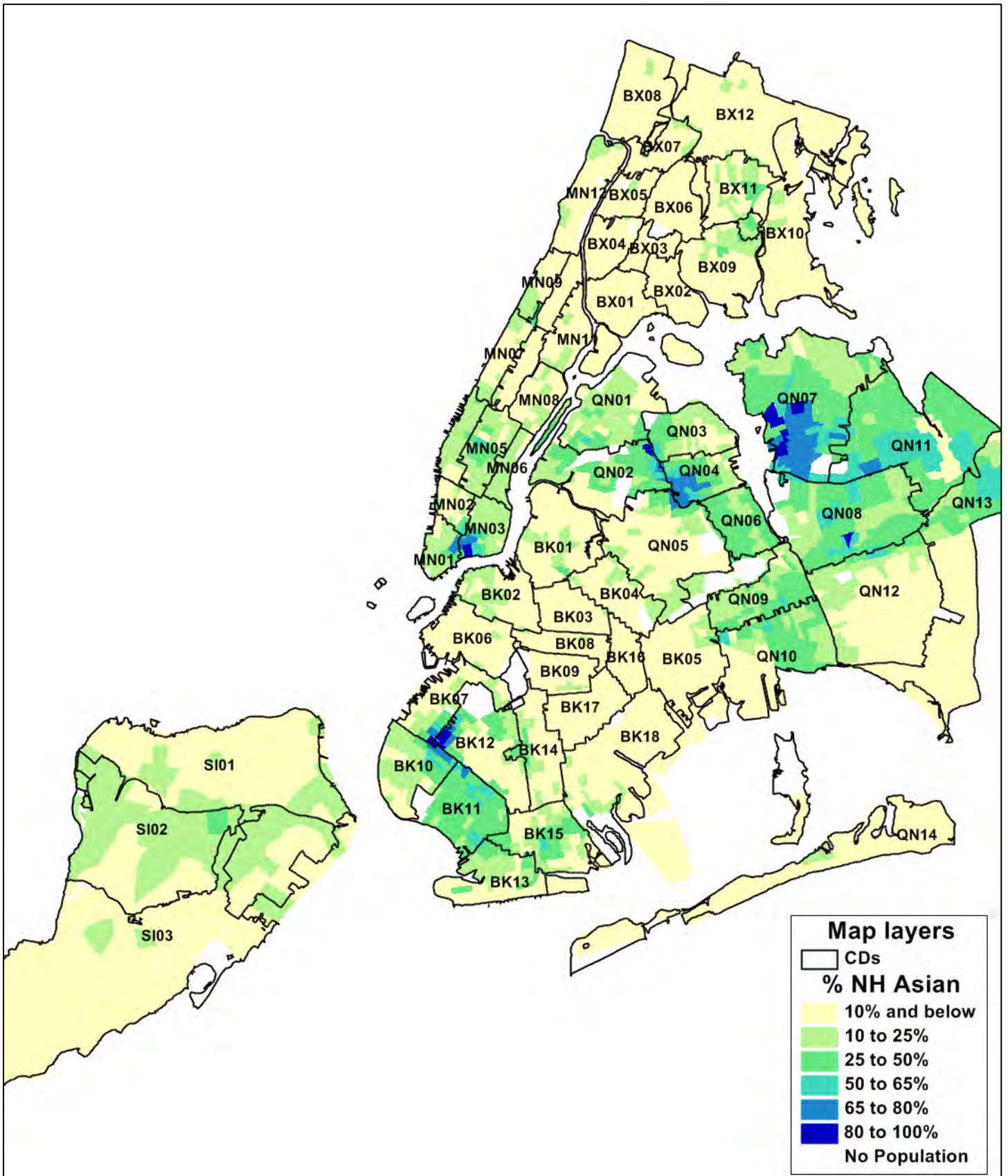


Exhibit 12 – Distribution of NYC Asian Population by Census tract and CD boundaries overlaid (2013-17 ACS)



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Protective Order (ECF 82)

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Protective Order (ECF 82)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

SHAUNA NOEL and EMMANUELLA SENAT,

Plaintiffs,

-against-

15-CV-5236 (LTS) (KHP)

CITY OF NEW YORK,

Defendant.

-----X

EXPERT REPORT OF PROFESSOR ANDREW A. BEVERIDGE
IN REBUTTAL TO THE
FEBRUARY 13, 2019 EXPERT REPORT OF PROFESSOR EDWARD G. GOETZ

May 10, 2019

A. Qualifications, experience, compensation

1. I have set out my qualifications, experience, and compensation in my April 1, 2019 report.

2. For this report, I have been asked to review and comment on the February 13, 2019 report of Professor Edward Goetz, specifically the extent to which his analysis:

- a. Documents his assertions about the scope and location of displacement;
- b. Connects displacement to the universe of households who apply for lottery housing;
- c. Provides evidence for his conclusions about the functions of the “community preference” (“CP”) policy;
- d. Recognizes the similarities or differences of those who apply for lottery housing as “insiders” (those living in the community district preference area for a particular lottery development) and as “outsiders” (those New York City residents not living in the community district preference area for a particular lottery development);
- e. Is able to support his argument that there are fundamental differences between White and other neighborhood racial typologies when it comes to “hoarding” resources (at 15); and
- f. When examining factors that buffer against displacement, takes account of the fact that, in the New York City context, there are large differences in the amount of public and other subsidized housing between and among community districts.

B. Data

3. The data used here are principally defendant's Housing Connect data. New York City Housing and Vacancy Survey (HVS) data are also referenced. I reviewed the transcript of Professor Goetz's deposition and the Oct. 2, 2015 declaration of Vicki Been. I also drew on the *Bytes of the Big Apple*, as well as the *Picture of Subsidized Housing* (from HUD) for mapping of public and subsidized housing; I have also used a map from defendant's "Where We Live" website. I will be producing such of defendant's data as coded or recoded for this analysis that has not previously been provided to defendant and shall be producing the programs related to the reorganization and analysis of the data that have not previously been provided to defendant.

C. Discussion of scope and location of displacement

4. Professor Goetz cites studies that use as proxies for displacement some of the reasons for renter moves within New York City provided by respondents to various iterations of the HVS, but he does not make use for this purpose of any iteration more recent than 2008, even though one clear import of his report is that the reader should believe that the phenomenon of actual displacement has and continues to escalate. Subsequent to 2008, there have been iterations of the HVS in 2011, 2014, and 2017. Professor Goetz's report cites data from the 2011, 2014, and 2017 HVS iterations (*e.g.*, at 2 and 3), but not in connection with actual displacement.

5. Professor Goetz states that "the contemporary context of displacement is characterized by the forced movement of lower-income families from neighborhoods that are rapidly escalating in value and price due to high levels of private capital investment, and from neighborhoods that are the subject of new initiatives of large scale public sector investment" (at 6; more generally, at 6-9). Nevertheless, he does not provide current data on the scope of actual

displacement of households by income level (for example, up to 50 percent AMI, the upper limit of what is called “very low income”; up to 80 percent AMI, the upper limit of what is called “low income”; or any level in between);¹ does not distinguish between moves within a community district and moves from one community district to another; and does not document where displacement is occurring.

6. Professor Goetz does not explain why he apparently accepts the treatment of the move reason that combined “difficulty paying rent or mortgage,” with “wanted less expensive residence”² as a reason in all cases demonstrating that the mover had been displaced. (The wording of this question was changed in 2017 to “wanted greater housing affordability.”³) Why would all such households be ones that have been actually displaced?⁴

7. Professor Goetz sometimes uses the term “forced displacement” and other times uses the term “displacement,” but does not make clear how or whether he is actually distinguishing between the two. Nor does he make clear what the criteria for “forced” displacement are, even at the apartment level (what level of rent burden? what level of poor conditions?).

8. At the community district level (*i.e.*, the conclusion that a household has been

¹ See the information sheet from HPD characterizing different income levels, Exhibit 1 to this report, available online at <https://www1.nyc.gov/assets/hpd/downloads/pdf/renter-resources/affordable-housing-income-eligibility.pdf>.

² See the Record Layout for 2002 NYC HVS, at 3-4, available online at: <https://www2.census.gov/programs-surveys/nychvs/technical-documentation/record-layouts/2002/occ-02-long.pdf>.

³ See the Record Layout for 2017 NYC HVS, at 3-3, available online at: <https://www2.census.gov/programs-surveys/nychvs/technical-documentation/record-layouts/2017/occupied-units-17.pdf>

⁴ The Goetz report does acknowledge that “[b]y its nature, the phenomenon [of displacement] is difficult to measure” (at 7).

forced to move out of a community district), he does not make clear how to determine whether a household has been forced to move away. Indeed, he principally discusses “neighborhoods,” including the harms suffered from being forced to leave a neighborhood. He does not discuss the fact that community districts in New York City contain multiple neighborhoods, nor opine, for example, as to whether he views the harm of moving into a new neighborhood close to one’s old neighborhood but across a community district line to be greater or less than the harm of moving into a new neighborhood farther away from one’s old neighborhood but within the same community district.

D. Lack of connection between displacement discussion and community preference discussion; lack of evidence for claimed benefits of community preference.

9. It turns out that community preference figures very little in the Goetz report. In a 22-page report, Professor Goetz offers his opinion of the policy at page 2 (asserting that it serves legitimate, government interests), and then does not discuss community preference again for the next 17 pages. He returns to making further assertions about the policy on pages 20-22.

10. Professor Goetz asserts that the policy “directly prevents displacement” (at 20); “directly preserves affordability” by “reserving a portion of units for income-qualified neighborhood residents” (also at 20); “prevents a displacement prior to the crisis stage” and thus spares households “the considerable anxiety of fighting their displacement” (at 21); and serves to “mollify fear of displacement among neighborhood residents” (also at 21). He then repeats his previous points (at 22).

11. But in a report accompanied by 110 footnotes, none of these assertions are footnoted, none recite evidence from any lottery data, and none are paired with any other evidence

that would suggest that the policy does what Professor Goetz asserts that it is “aimed” at doing.

12. Thus, for example, there is no information provided in the Goetz report as to which or how many Housing Connect applicant households are examples of the community preference policy “directly prevent[ing] displacement.” Likewise, there is no information provided in the Goetz report as to which or how many Housing Connect applicants are examples of the policy operating to hinder the chances of outsiders to either prevent their displacement or to reduce their fears of displacement.

13. Or, to take another example, Professor Goetz provides no explanation for how (if at all) the community preference policy targets apartments to that fraction of applicants who are in fact at risk of displacement. Note that the proxies for displacement or risk of displacement recited in the report (*e.g.*, rent burden, particular reasons for moving related to cost of existing housing, being subject to landlord harassment), are *not*, as I understand it, among the selection criteria for lottery apartments.

14. In sum, the risks and fears of displacement that Professor Goetz references are not made concrete in relation to the lottery process or lottery applicants, nor are they linked with any evidence to how community preference functions.

15. Professor Goetz discusses the need for a multi-pronged approach to fight displacement (at 18), but he does not quantify the extent of the purported contribution of (*i.e.*, results achieved by) the community preference policy in preventing displacement or the fear of displacement, as compared with the contribution or results achieved by other approaches he describes as displacement-fighting.

16. Professor Goetz gives short shrift to the fact that “many families choose to move to different neighborhoods and can benefit from their mobility” (dealing with that fact in his report

only in one subordinate clause at page 16). In contrast, he expends several pages detailing harms associated with loss of “place attachment” (at 16-19), underscoring that “other families prefer to remain in neighborhoods they have come to identify with” (at 16).

17. [Redacted]

18. [Redacted]

⁵ [Redacted]

E. Participation analysis

19. For the 168 lotteries analyzed in my April 1, 2019 report, Table 1, on the next page, shows the distribution of lottery applications for each unique household.⁶

⁵

[Redacted]

⁶ Excluding non-NYC households.

Table 1: Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside CD (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

20. [Redacted]

21. [Redacted]

22. Table 2, on the next page, changes the analysis of household application patterns from in-district versus out-of-district to in-borough versus out-of-borough.

Table 2: Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside Borough (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

23. [Redacted]

24. [Redacted]

25. [Redacted]

[Redacted]

Table 3: White Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside CD (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

Table 4: Black Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside CD (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

Table 5: Hispanic Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside CD (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

Table 6: Asian Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside CD (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

26.

[Redacted]

[Redacted]

Table 7: White Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside Borough (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

Table 8: Black Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside Borough (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

Table 9: Hispanic Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside Borough (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

Table 10: Asian Lottery Entrants by Total Lotteries Entered (Down) and Percent of Applications to Projects Outside Borough (Across)							
	0.00%	01 to 24.99%	25.00 to 49.99%	50.00 to 74.99%	75.00 to 99.99%	100%	Total
One Lottery	[Redacted]						
2-4 Lotteries							
5-9 Lotteries							
10-19 Lotteries							
20 or more Lotteries							
Total							

27.

[Redacted]

[Redacted]

F. Rent burden

28.

[Redacted]

⁷

[Redacted]

29.

[Redacted]

⁸

[Redacted]

9

⁷ Calculated as described in the Appendix to my April 2019 report.

⁸ As defined in my April 2019 report.

⁹

[Redacted]

30.

[Redacted]

31. The results of the analysis are shown below.

Table 11: Rent Burden per Available Housing Connect Data								
	Rent as Percentage of Income Based on Total Rent				Rent as Percentage of Income Based on Contribution to Total Rent			
	No Subsidy Claimed		Subsidy Claimed		No Subsidy Claimed		Subsidy Claimed	
	No CP	CP	No CP	CP	No CP	CP	No CP	CP
N Obs	[Redacted]							
Mean								
Max								
Min								
1st Pctl								
5th Pctl								
10th Pctl								
25th Pctl								
30th Pctl								
40th Pctl								
50th Pctl								
60th Pctl								
70th Pctl								
75th Pctl								
80th Pctl								
90th Pctl								
95th Pctl								
99th Pctl								

32. [Redacted]

¹⁰ [Redacted]

33. [Redacted]

34. [Redacted]

¹⁰ These definitions of rent burden and severe rent burden as used by Professor Goetz (at 2, 3).

[Redacted]

11

[Redacted]

35.

[Redacted]

36.

[Redacted]

12

37.

[Redacted]

11

[Redacted]

12

[Redacted] the community preference policy, if it is working as designed, reduces the chances of many families who want to move to different neighborhoods and could benefit from that mobility. Transcript of Goetz deposition (“Goetz Depo.”), at 125:5-127:6. Excerpts of the Goetz deposition are annexed to this report at Exhibit 2.

[Redacted]

38. [Redacted]

G. Reasons for moving

39. Housing Connect gives applicants the opportunity to set forth one or more of 10 specified reasons for moving.¹³ Table 12, on the next page, tabulates each of the reasons offered by defendant, split between those mentioned in each application that did not have the benefit of community preference and each that did.¹⁴

¹³ It also allows for an “other” selection which permits a customized reason to be entered.

¹⁴ As more than one reason is permitted per application, the percentages associated with the reasons sum to more than 100 percent.

Table 12: Reasons for Moving by Entrant, Comparing Non-CP-Beneficiary and CP Beneficiary Applications			
	Non-CP-Beneficiary	CP Beneficiary	Total
Living with Parents	[Redacted]		
Not Enough Space			
Bad Housing Condition			
Live in Shelter/Street			
Health Reasons			
Disability Access Problems			
Live with Relative / Other Family Member			
Rent Too High			
Increased Family Size			
Do Not Like Neighborhood			
Other			
Total Entrants			

40. [Redacted]

41. [Redacted]

42. Table 13, below, is similar to Table 12, but here the unit of comparison is the unique household. Households who only applied where they would get community preference are only listed in that category, with a reason listed so long as it appeared on at least one application. Likewise, households who only applied where they would not get the benefit of community preference are only listed in that category, with reasons listed in the same fashion. For households where some applications were in-CD and others were out-of-CD, they appear once in the “Non-CP-Beneficiary” category, with the information from all of their non-CP-beneficiary applications reported in the same fashion as previously described. They then appear once in the “CP Beneficiary” category with the information from all of their CP beneficiary applications treated in the same fashion as previously described. As before, since multiple reasons can be given, the various reasons do not total to 100 percent.

Table 13: Reasons for Moving by each Household for all its Non-CP-Beneficiary Applications and by each Household for all its CP Beneficiary Applications			
	Non-CP-Beneficiary	CP Beneficiary	Total
Living with Parents	[Redacted]		
Not Enough Space			
Bad Housing Condition			
Live in Shelter/Street			
Health Reasons			
Disability Access			
Live with Relative / Other Family Member			
Rent Too High			
Increase in Family Size			
Do Not Like Neighborhood			
Other			
Total Households per text of ¶ 41			

43. [Redacted]

44. [Redacted]

15

H. Resisting change in neighborhood racial composition and community preference

45. Professor Goetz attempts (at 15) to distinguish “community protection” in White neighborhoods from that which occurs in other neighborhoods:

The desire to protect community among lower-income households in disadvantaged neighborhoods, moreover, is *fundamentally different than what is seen in exclusive white neighborhoods*. The anti-displacement efforts described in this section are not exclusionary in their objectives, they are instead driven by the desire of people with limited means to remain in their neighborhoods in order to maintain social networks and support systems and to avoid the considerable disruption of dislocation. Thus, *rather than an attempt to hoard resources and deprive others access to resources, community protection in lower-income neighborhoods is a form of solidarity in the face of injustice*. (Emphases added).

46. By the same token, he writes that “protection of one’s home and community is a

15

[Redacted]

strong, unifying force in local politics” (at 14); he explained at his deposition that the unifying principle is sometimes based around racial or ethnic identity.¹⁶

47. In connection with his having written about resistance to new housing development and residents’ fears of that development (at 21), Professor Goetz cited to an article entitled “They’re Not Building It For Us,” and explained at his deposition that he would not expect that the New York City context would be an outlier to the phenomenon explained in the article as follows: “Throughout this process race plays a central role as new development is seen as white and for white people who either live in nearby but segregated suburbs or for potential new residents.”¹⁷

48. Professor Goetz went on to confirm that he would expect that the following phenomenon, described in the same article, occurs in New York City, too: “When residents describe their fears of gentrification they do not describe them only in terms of displacement through housing. They also point to the possibility that new development becomes what Anderson describes as ‘white space.’”¹⁸

49. I have not been asked to provide an opinion as to the intent behind attempts to hoard resources and deprive others of access to resources, or to offer agreement or disagreement with Professor Goetz’s views as described in paragraphs 44-47, above. What I can do is describe what happens in the housing lotteries I have studied.

50. Because Professor Goetz refers to community protection in “lower-income neighborhoods,” I am presenting apparently-eligible and awarded results from the same universe

¹⁶ Goetz Depo., at 138:20-139:15.

¹⁷ Goetz Depo., at 140:7-141:23.

¹⁸ Goetz Depo., at 141:242-142:16.

of lotteries (and in the same manner) as presented in my April 2019 report, but this time limited to units at or below the 80 percent AMI level (the upper bound of “low income” as used by defendant). Results for apparently eligible are shown in Tables 14 and 15, below.

Table 14 – Comparing each group’s CP beneficiary apparently eligible HHs as a percentage of that group’s total apparently eligible HHs against the highest such percentage for any group, by CD typology, for units at or below 80% AMI					
CD typology	Group with highest percentage of its apparently eligible HHs being CP beneficiary apparently eligible HHs, for units at or below 80% AMI	Relative percentage by which highest group exceeds other groups			
		White	Black	Hispanic	Asian
Majority White	[Redacted]				
Majority Black					
Majority Hispanic					
Majority Asian					
Plurality White					
Plurality Black					
Plurality Hispanic					

Table 15 - Comparing relative percentage change for each group from share of non-beneficiary apparently eligible HHs to share of CP beneficiary apparently eligible HHs, by CD typology, for units at or below 80% AMI				
CD typology	White	Black	Hispanic	Asian
Majority White	[Redacted]			
Majority Black				
Majority Hispanic				
Majority Asian				
Plurality White				
Plurality Black				
Plurality Hispanic				

51.

[Redacted]

52. Results for those awarded lottery units (at or below the 80 percent AMI level) are shown in Tables 16 and 17.

Table 16 – Comparing each group’s CP beneficiary awardees as a percentage of that group’s total awardees against the highest such percentage for any group, by CD typology, for units at or below 80% AMI					
CD typology	Group with highest percentage of its awardees being CP beneficiary awardees, for units at or below 80% AMI	Relative percentage by which highest group exceeds other groups			
		White	Black	Hispanic	Asian
Majority White	[Redacted]				
Majority Black					
Majority Hispanic					
Majority Asian					
Plurality White					
Plurality Black					
Plurality Hispanic					
Plurality Hispanic					

Table 17 - Comparing relative percentage change for each group from share of non-beneficiary awardees to share of CP beneficiary awardees, by CD typology, for units at or below 80% AMI				
CD typology	White	Black	Hispanic	Asian
Majority White	<div style="font-size: 4em; color: #800000; font-weight: bold;">[Redacted]</div>			
Majority Black				
Majority Hispanic				
Majority Asian				
Plurality White				
Plurality Black				
Plurality Hispanic				
Plurality Hispanic				

53.

[Redacted]

54.

[Redacted]

[Redacted]

55.

[Redacted]

¹⁹ [Redacted]

I. The role of public and subsidized housing in mitigating displacement risk

56. Professor Goetz acknowledges (at 10) that public housing and other forms of housing welfare and regulation “have been and remain key in keeping lower-income families in neighborhoods they would otherwise be unable to afford.” What he does not do is point out that public and subsidized housing is not available in equal distribution throughout New York City, but rather is concentrated in neighborhoods (and community districts) with relatively large proportions of African-American and/or Latino residents (that, correspondingly, have relatively small proportions of Whites). This fact is demonstrated through the maps that are attached as Exhibits 3 to 9 of this report.

¹⁹

[Redacted]

57. All but the last map are based upon the Bytes of the Big Apple, as well as data from the most recent Picture of Subsidized Housing. They show the racial and Hispanic typology of each community district (the same typologies that were used in my April 2019 report).

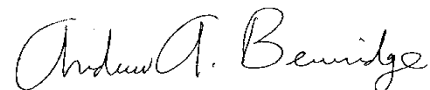
58. The location of HUD subsidized vouchers and projects are shown first (Exhibit 3) based on one dot per 5 units, using Census tract boundaries.

59. The next set of maps (Exhibits 4-8) are maps of each borough and its environs with circles that each show the location of HUD-subsidized projects, with the size of the symbol corresponding to the number of units.

60. All of these maps make clear that subsidized projects and units are highly concentrated, principally in community districts that are majority or plurality African-American or Latino.

61. The last map (Exhibit 9) is a map produced as part of defendant's Where We Live process and states that it reports on "city-assisted" housing.²⁰ I have not independently confirmed these data; but they show a similar pattern of concentration.

62. In pointing out the disproportionate concentrations, I am in no way suggesting that either the concentration of poverty or the racial segregation that these siting patterns facilitated and facilitate are benign. It would, however, have behooved Professor Goetz to have factored in which neighborhoods have the *anti-displacement* protection provided by public and subsidized housing before determining relative displacement risk.



Andrew A. Beveridge

²⁰ The map is available online at <https://wherewelive.cityofnewyork.us/explore-data/where-new-yorkers-live/>. The accompanying text states, "Government-assisted housing is concentrated, but not exclusively located, in high-poverty neighborhoods in New York City."



Does my income qualify me for affordable housing ?

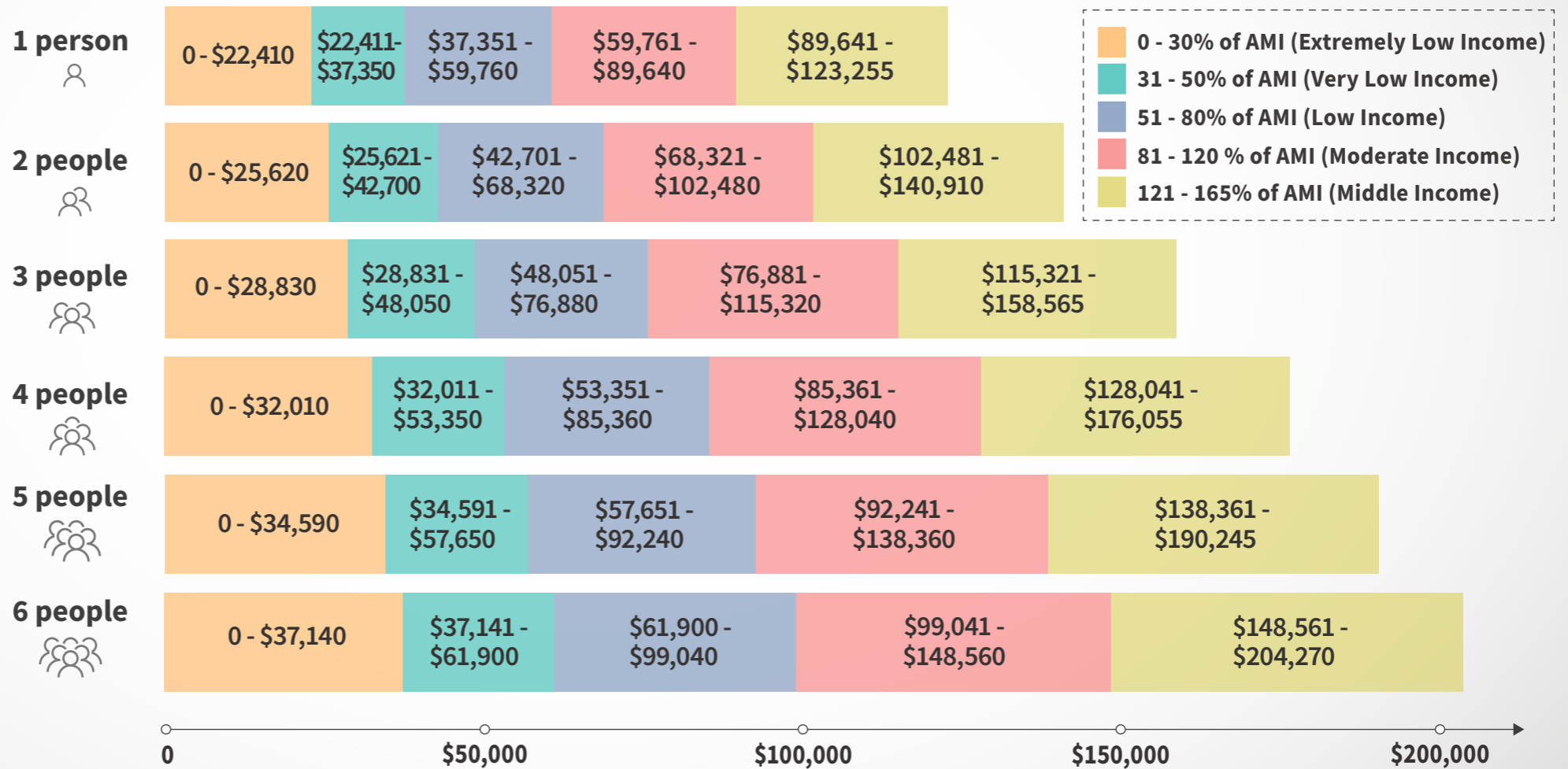
NYC creates affordable housing opportunities for households at a wide range of sizes and income levels.

This chart helps explain the income categories that we use, which vary by household size, so you can see where you and your family fit in:

Affordable housing is based on a household's percentage of the area median income (AMI), which is set by the federal government. Housing is considered affordable if it costs about one-third or less of what the people living there make, and is regulated so the rent can't go up dramatically over time.

The numbers on this chart reflect 2019 AMI levels.

Eligible Income Levels by Household Size



If your income fits in this chart, register for Housing Connect today so you can apply for housing opportunities that are affordable for you: www.nyc.gov/housingconnect

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
SHAUNA NOEL and EMMANUELA SENAT,
Plaintiffs,
vs. 15-CV-5236
CITY OF NEW YORK,
Defendant.
-----x

VIDEOTAPE DEPOSITION OF EDWARD GOETZ
New York, New York
April 5, 2019
9:36 a.m.

Reported by:
ERICA L. RUGGIERI, RPR

1 GOETZ

2 MR. GURIAN: Well, I will, in
3 fact, just make sure that things
4 are clear.

5 Q. You agree that many
6 families choose to move to different
7 neighborhoods and can benefit from
8 their mobility, yes?

9 A. Yes.

10 Q. Doesn't the community
11 preference policy standing alone
12 reduce their chances to execute
13 their wishes in the context of
14 affordable housing lotteries?

15 MS. SADOK: Objection.

16 A. We don't know the extent to
17 which that happens. You'd have to
18 look at the data. But applying only
19 that criteria that comes from fair
20 housing and not any other criteria
21 it's a possibility.

22 Q. Professor Goetz, it's --
23 it's -- it's not just a -- it's not
24 just a possibility. I mean you
25 know, I mean you know it intuitively

1 GOETZ

2 and you know it in terms of what
3 you've done and learned about.

4 The policy is that -- and I'm
5 not putting any moral connotation on
6 this. I'm just talking about
7 operationally, the policy, unless it
8 does nothing, unless it's completely
9 ineffectual, reduces the percentage
10 of outsiders who get apartments,
11 right?

12 MS. SADOK: Objection.

13 A. Right. It if it were
14 operating in the way that it was
15 decided -- in the way that it was
16 designed it would have that affect.

17 Q. So talking about the way
18 that it was designed, the policy
19 reduces the chances of many families
20 who want to move to different
21 neighborhoods and could benefit from
22 the mobility, right? I mean there
23 are other things we can -- there are
24 other things we can discuss about
25 it, whether it's justified or not,

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GOETZ

but that part is true, right?

MS. SADOK: Objection.

Q. If it's working as designed.

A. Correct.

Q. I think the next few are noncontroversial, but there have been a lot of depositions in this case and I have been proved wrong.

You are aware that politicians do not always reflect their -- the views of their constituents or even the majority of their constituents, is that a fair observation about the political world as we inhabit it?

MS. SADOK: Objection.

A. That is a fair observation.

Q. And it would be pretty difficult to -- for them, for any of them to represent the view of all of their constituents, right, because there's a very big, and I think you will agree, kind of bizarre assumption in there that all of

1 GOETZ

2 media file number two.

3 (Whereupon, there is a recess
4 in the proceedings.)

5 THE VIDEOGRAPHER: The time is
6 12:36. We are back on the record.
7 This is the beginning of media file
8 number three.

9 Q. Professor Goetz, did you
10 speak with counsel from the city
11 about your testimony during the
12 break?

13 A. Yes, I did.

14 Q. Okay. You spent some time
15 in your report discussing what you
16 describe as efforts to fight back
17 against displacement, correct?

18 A. Yes.

19 Q. And you still have the
20 report in front of you, right. On
21 page 14 you write that in the second
22 full paragraph, "Protection of one's
23 home and community is a strong
24 unifying force in local politics."

25 Do you see that?

1 GOETZ

2 A. Yes. Yes, I do.

3 Q. And you believe that to be
4 true?

5 A. Yes.

6 Q. And you believe it's true
7 in New York City in similar ways to
8 the way it's true in other places in
9 the U.S.?

10 A. Yes, I do.

11 Q. And sometimes community,
12 the unifying principle is based
13 around racial or ethnic identity,
14 correct?

15 A. Sometimes it is.

16 MR. GURIAN: I'm going to ask
17 that a document be marked as
18 Plaintiffs' 314.

19 (Plaintiffs' Exhibit 314,
20 Article in Societies journal,
21 marked for identification, as of
22 this date.)

23 Q. What's that document?

24 A. This document is an article
25 in Societies, the journal Societies

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GOETZ

by Danley and Weaver entitled,
"They're Not Building It For Us,
Displacement Pressure Unwelcomeness
and Protesting Neighborhood
Investment."

Q. And you cite this report,
this article, excuse me, on page 21
of your report. It's in the first
full paragraph where you are talking
about resistance to new housing
development and a dynamic not unique
to New York City, right?

A. That's correct.

Q. And if I can ask you to
turn to the, to page 6 of the
Danley-Weaver article, that
pagination is the actual article
pagination on top.

A. Okay.

Q. In the results section --
do you see the results section?

A. Yes.

Q. Okay. We are on the same
page. They write, "Throughout this

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GOETZ

process race plays a central role as new development is seen as white and for white people who either live in nearby but segregated suburbs or for potential new residents."

A. I'm sorry, I was looking for it and I could not find it. Can I read it again because I was preoccupied trying to find it.

Q. It's the second sentence in Results.

A. Yes, I see it. Okay.

Q. You see that description?

A. I do.

Q. Would you expect that this phenomenon happens in New York City as well?

A. It happens in a number of places, yes. And I would --

Q. You wouldn't expect that New York City was an outlier?

A. Correct.

Q. And then on page 8, "When residents describe" -- this is right

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GOETZ

at the top, "When residents describe their fears of gentrification they do not describe them only in terms of displacement through housing. They also point to the possibility that new development becomes what Anderson describes as 'white space.'"

Do you see that?

A. Yes, I do.

Q. And would you expect that this phenomena occurs -- phenomenon occurs in New York City as well?

A. There's no reason to suspect otherwise.

Q. So part of the -- part of a fear of change, again, just to give a disclaimer, I'm not talking about every -- I'm not saying every person but I'm talking about what the author is describing here, that kind of thing. Part of the fear of change is the prospect of white incomers is a proxy for anticipated

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STATE OF NEW YORK)
) : ss
COUNTY OF NEW YORK)

I, EDWARD GOETZ, the witness
herein, having read the foregoing
testimony of the pages of this
deposition, do hereby certify it to
be a true and correct transcript,
subject to the corrections, if any,
shown on the attached page.

EDWARD GOETZ

Sworn and subscribed to before me,
this _____ day of _____,
201__.

Notary Public

**Exhibit 3. Community District Typology with HUD Subsidized Vouchers and Projects.
2013 to 2017 ACS Data Allocated. Boundaries based upon Bytes of the Big Apple.
HUD Data based upon the 2017 Picture of Subsidized Households.**

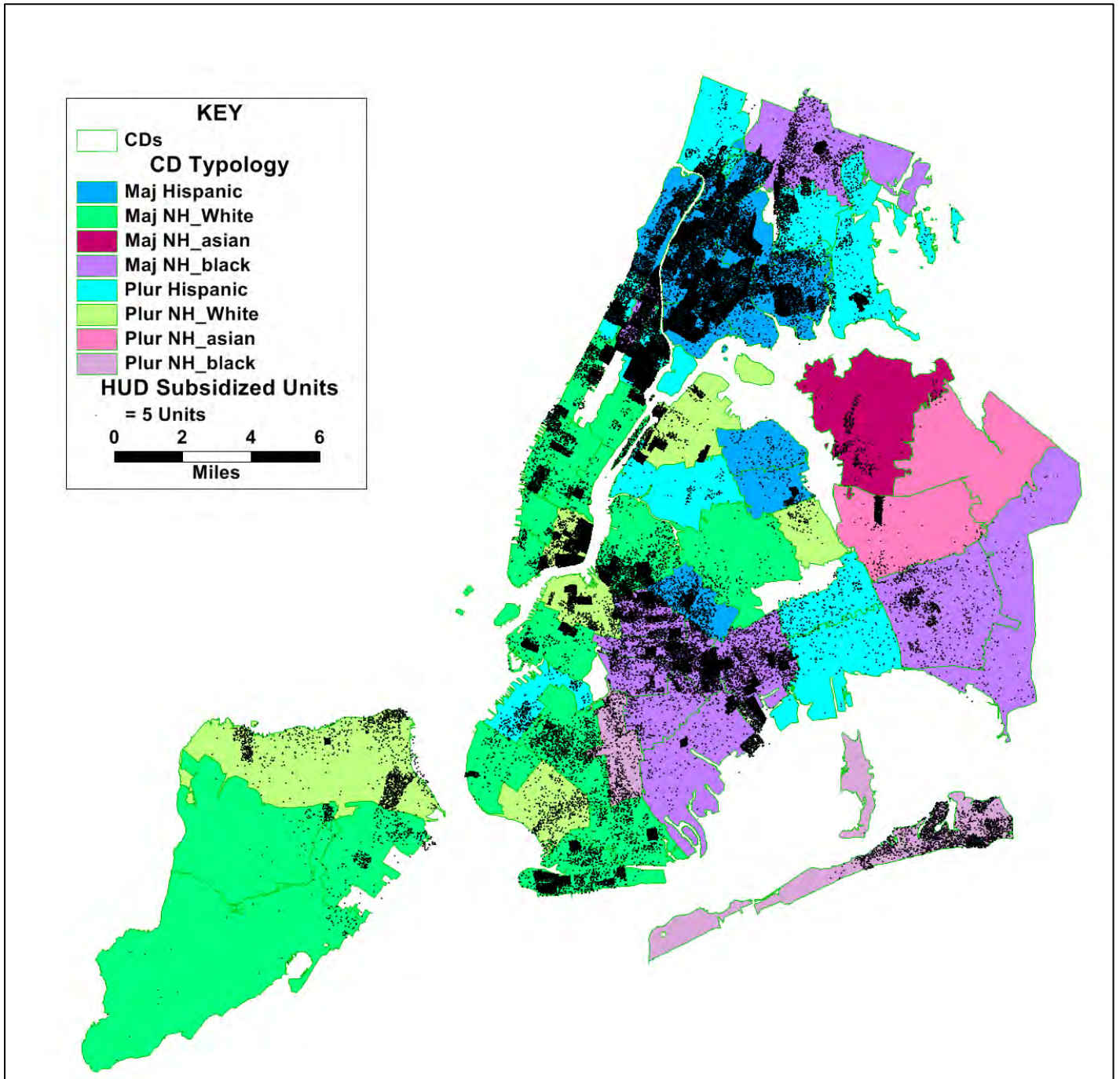


Exhibit 4. Community District Typology with HUD Subsidized Projects in the Bronx and environs. 2013 to 2017 ACS Data Allocated. Boundaries based upon Bytes of the Big Apple. HUD Data based upon the 2017 Picture of Subsidized Households.

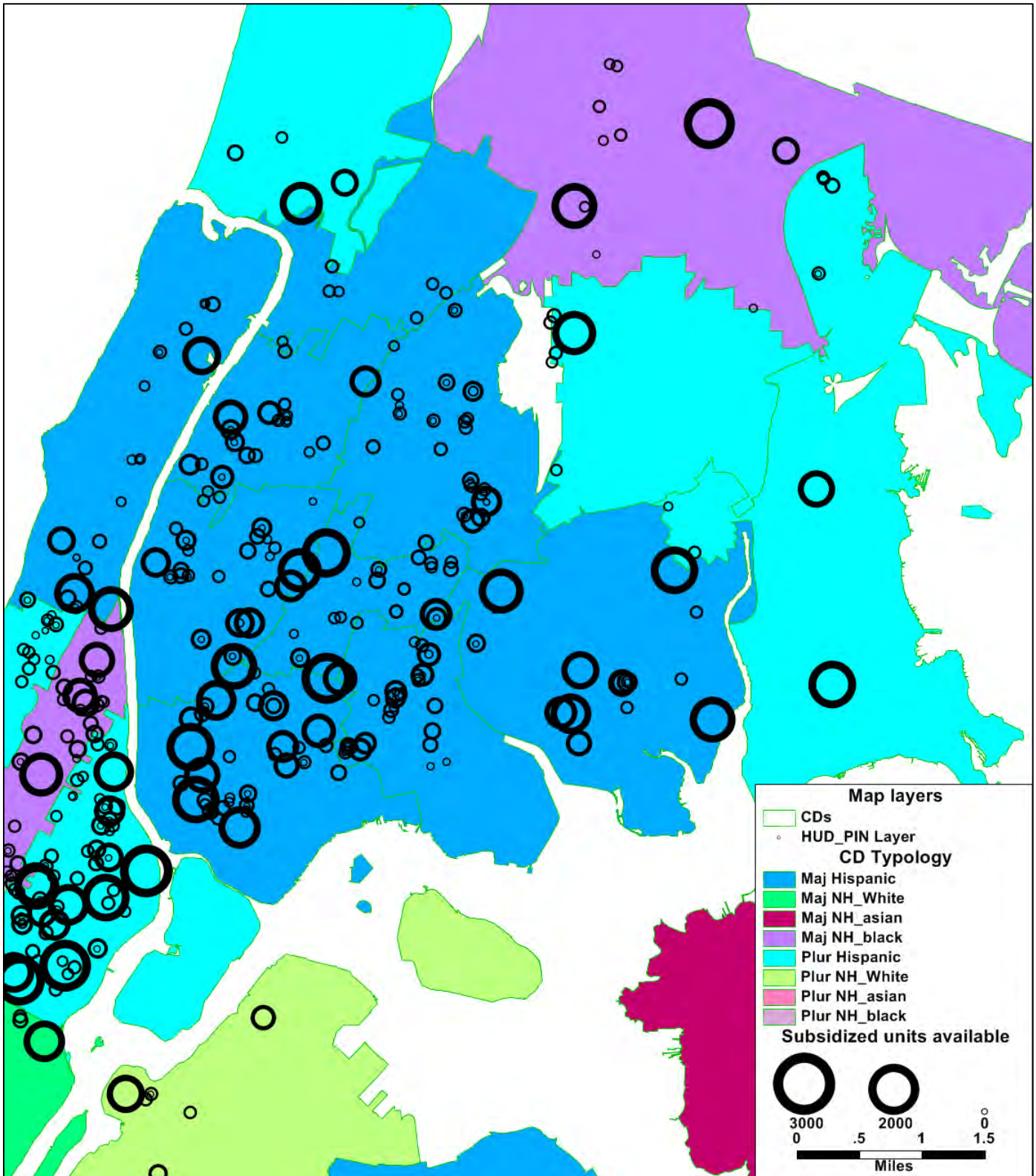
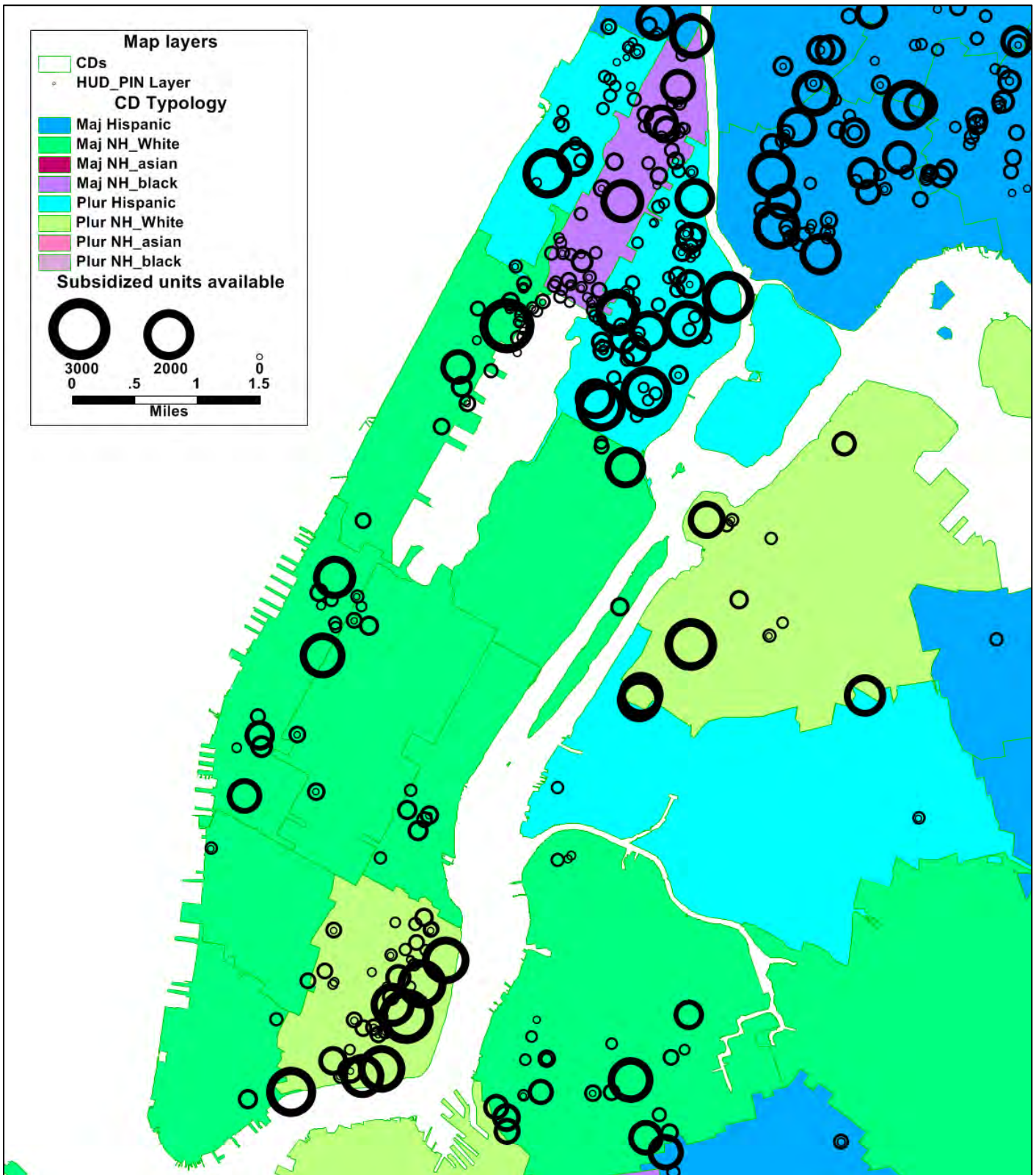


Exhibit 5. Community District Typology with HUD Subsidized Projects in Manhattan and environs. 2013 to 2017 ACS Data Allocated. Boundaries based upon Bytes of the Big Apple. HUD Data based upon the 2017 Picture of Subsidized Households.



**Exhibit 6. Community District Typology with HUD Subsidized Projects in Staten Island and environs.
2013 to 2017 ACS Data Allocated. Boundaries based upon Bytes of the Big Apple.
HUD Data based upon the 2017 Picture of Subsidized Households.**

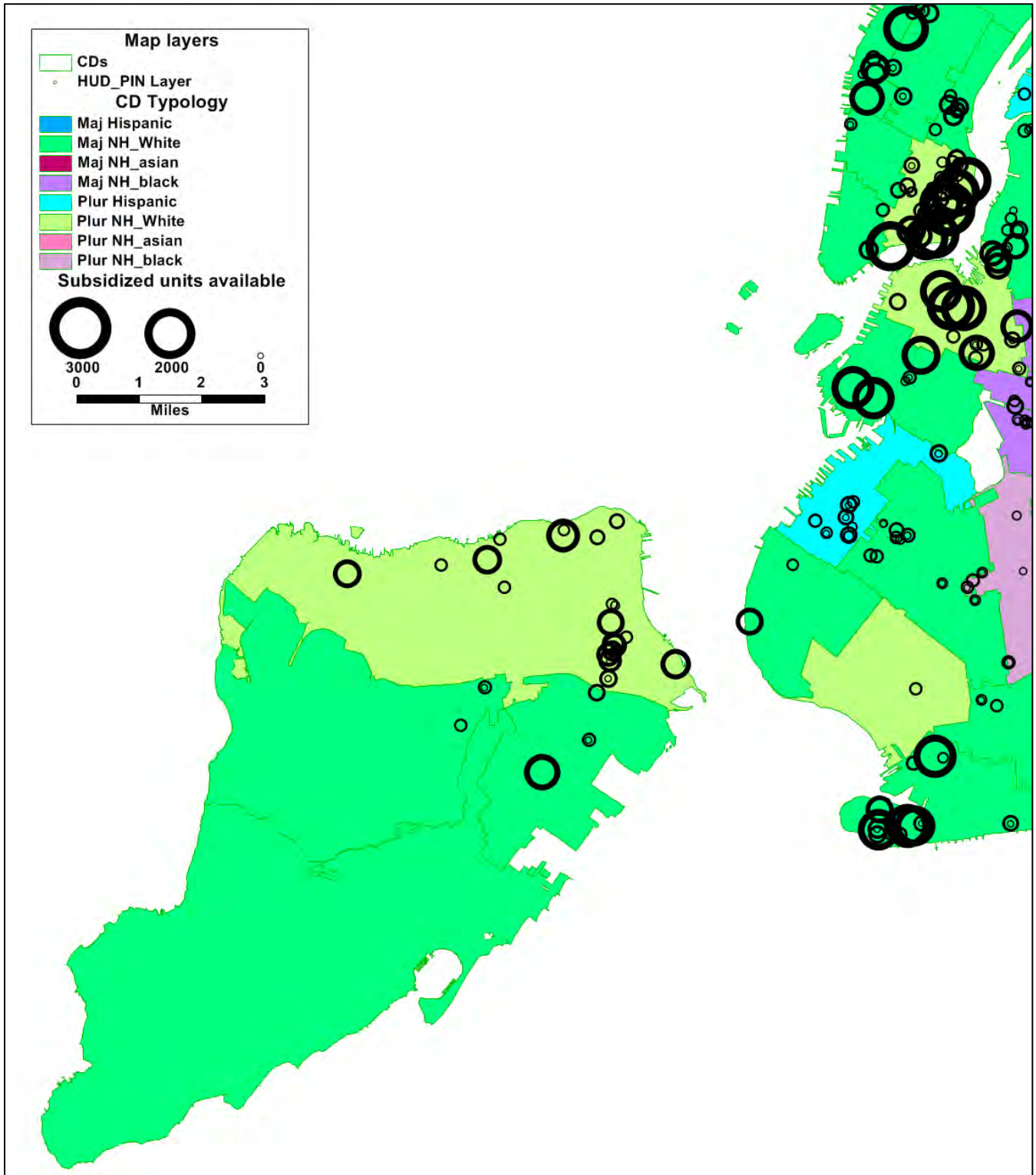
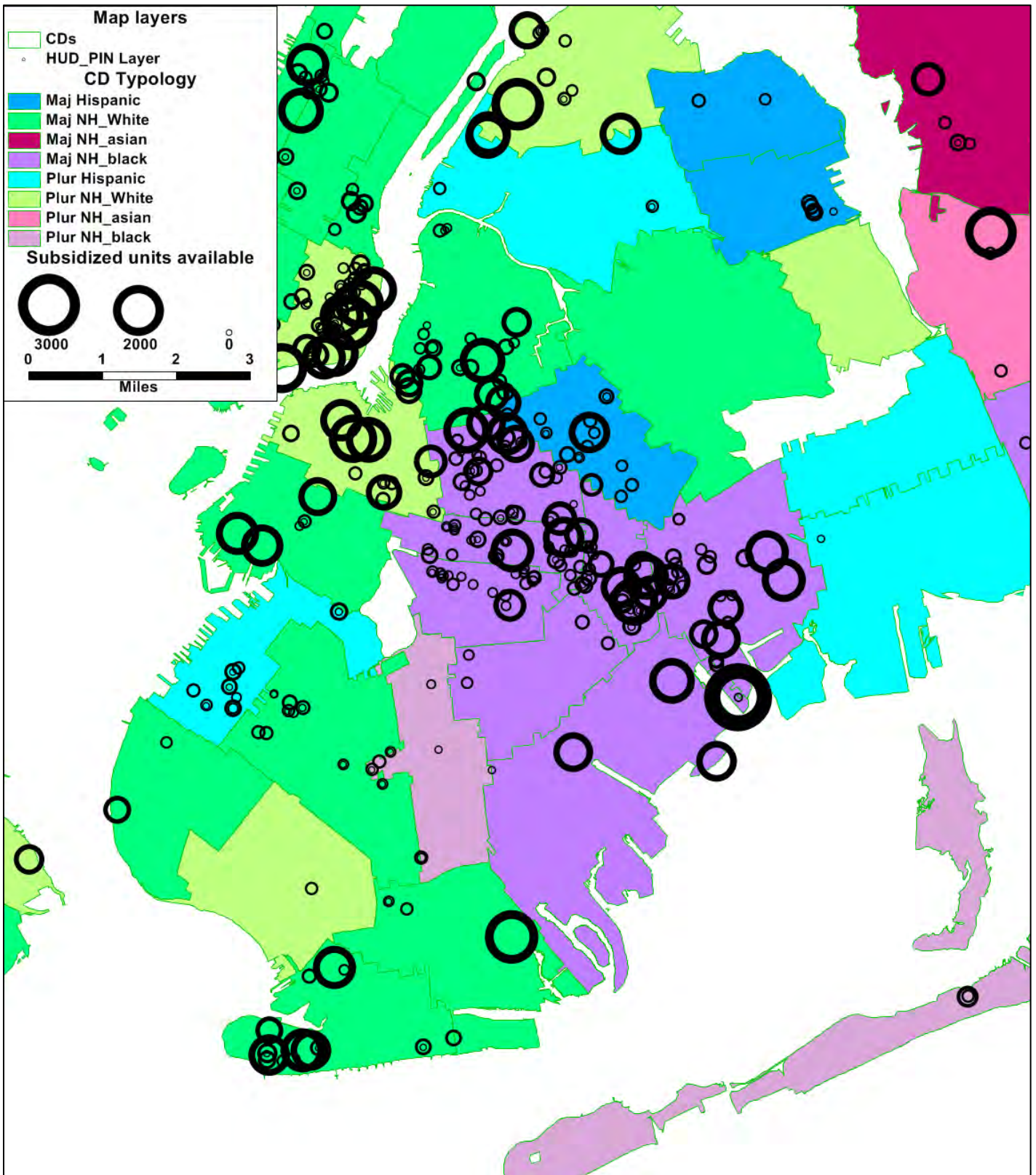


Exhibit 7. Community District Typology with HUD Subsidized Projects in Brooklyn and environs. 2013 to 2017 ACS Data Allocated. Boundaries based upon Bytes of the Big Apple. HUD Data based upon the 2017 Picture of Subsidized Households.



**Exhibit 8. Community District Typology with HUD Subsidized Projects in Queens and environs.
2013 to 2017 ACS Data Allocated. Boundaries based upon Bytes of the Big Apple.
HUD Data based upon the 2017 Picture of Subsidized Households.**

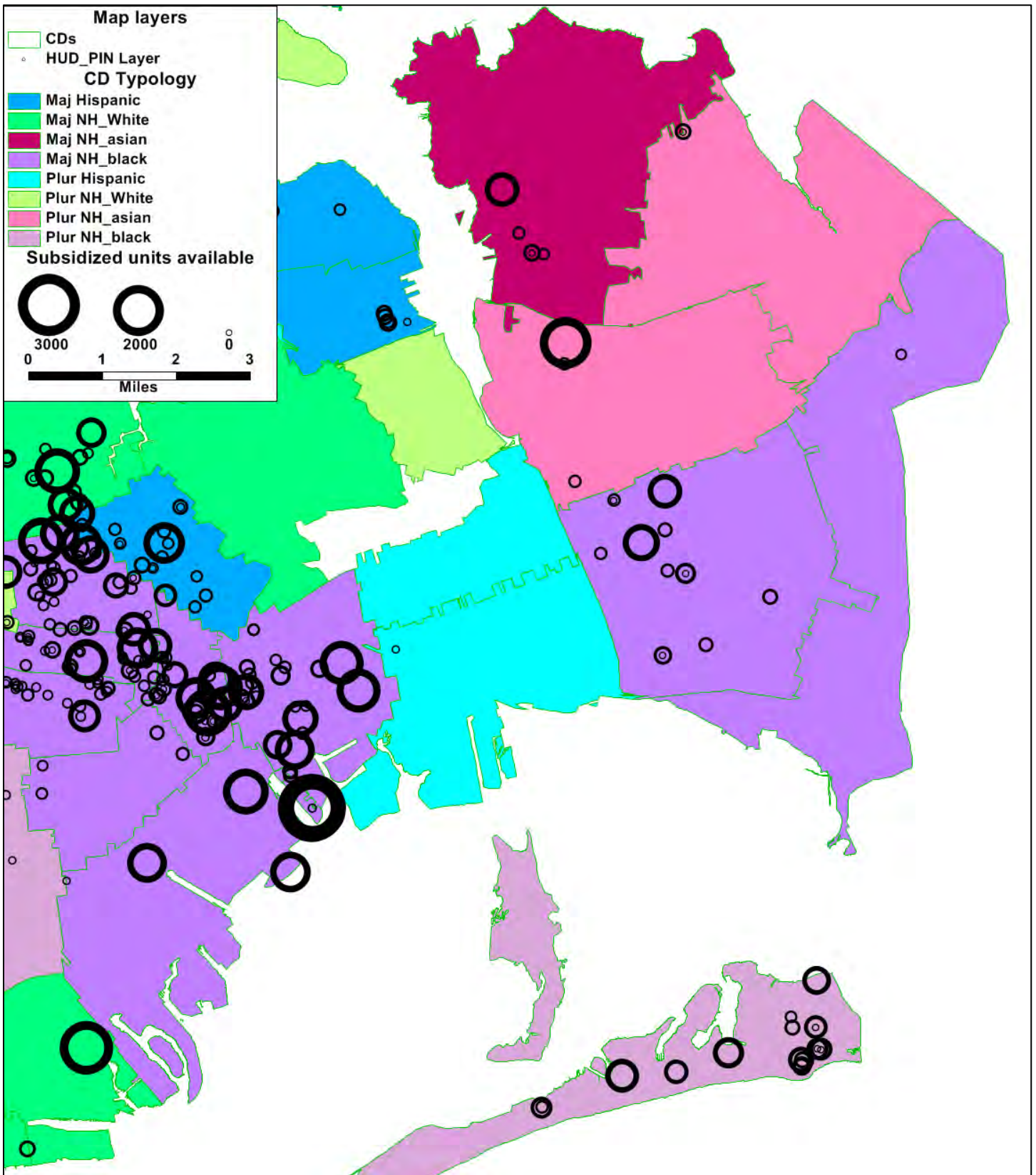
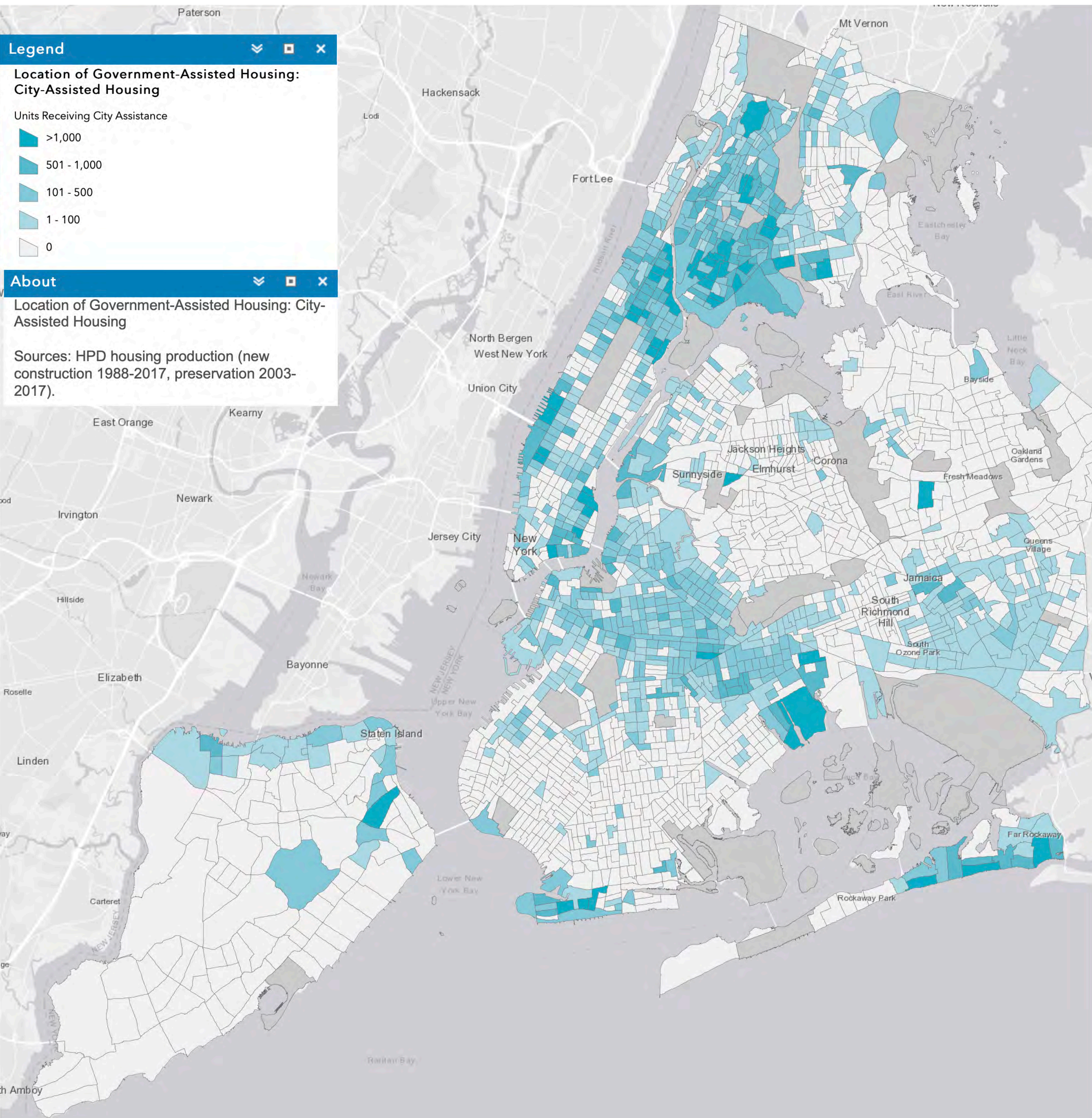


Exhibit 9: City-assisted housing, from defendant's "Where We Live" website




UPPER EAST SIDE & ROOSEVELT ISLAND (/WWW.DNAINFO.COM/NEW-YORK/MANHATTAN/UPPER-EAST-SIDE-ROOSEVELT-ISLAND)

Real Estate (/www.dnainfo.com/new-york/topics/real-estate)

City's Affordable Housing Lotteries Favor Young Single People, Stats Show

By Shaye Weaver (/www.dnainfo.com/new-york/about-us/our-team/editorial-team/shaye-weaver) | November 16, 2016 7:19am

 @shayeweaver (<http://twitter.com/shayeweaver>)



Roughly 41 percent of winners from 48 HPD lotteries between 2013 and 2015, were between the ages of 25 and 34, and 48 percent were single, HPD numbers show.

 [View Full Caption](#)

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NEW YORK CITY — Young, single New Yorkers were more likely to win affordable housing lotteries run by the Department of Housing Preservation and Development (<http://www1.nyc.gov/site/hpd/index.page>) from 2013 through 2015 than older people with families, city records show.

Although the city would not release the total number of applicants it received for its housing lotteries during that time period, it's clear only a fraction of the hundreds of thousands of people who apply for affordable housing in the city actually get it — in 2015, nearly 200,000 people applied for just 14 apartments in (<https://www.dnainfo.com/new-york/20151216/bushwick/nearly-200000-people-applied-for-14-affordable-apartments-bushwick-hpd>)Bushwick (<https://www.dnainfo.com/new-york/20151216/bushwick/nearly-200000-people-applied-for-14-affordable-apartments-bushwick-hpd>).

But new data shows that the lion's share of the affordable apartments are going to singles ages 25 through 34.



Shaye Weaver · DNAINfo Reporter



What has been your experience with HPD's Housing Lottery?

♥ 2 💬 12

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+4

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[utm_campaign=Upper+East+Side&utm_medium=integration_partner&utm_source=dnainfo&utm_content=sweaver%40dnainfo.com&prompt=top](https://neighborhoodsquare.com/n/item/4sxo?utm_campaign=Upper+East+Side&utm_medium=integration_partner&utm_source=dnainfo&utm_content=sweaver%40dnainfo.com&prompt=top))

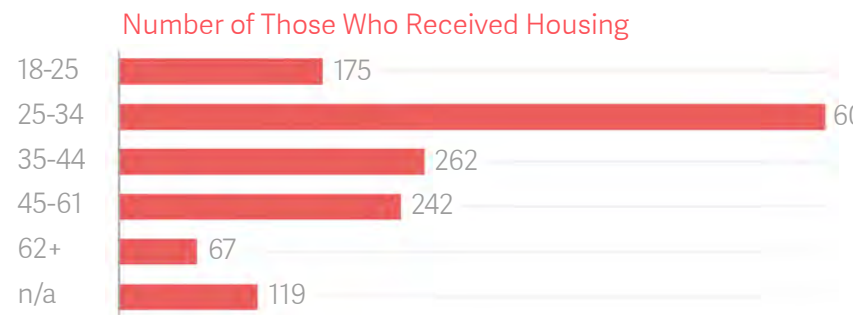
More than half of the 48 housing lotteries for 1,470 units across the city put out by HPD from January 2013 through the end of 2015 were made up of one-bedrooms and studios, according to the agency.

Forty-one percent of winners in those lotteries were ages 25 through 34, 50 percent of them were single, 36 percent are Hispanic and 27 percent of winners are black, according to data obtained by DNAinfo New York through a Freedom of Information Law request.

Only 4 percent were 62 or older, and 11 percent were under the age of 25.

The available units included 605 one-bedrooms, 293 studios, 516 two-bedrooms and 56 apartments with three or more bedrooms, according to HPD. These numbers don't take into account separate lotteries conducted by the City's Housing Development Corporation.

Affordable Housing Winners By Age



△ T L △ S Data: NYC Housing Preservation and Development

Share

Many affordable units are targeted to single professionals, or at least that seems to be the case on the west side of Manhattan, according to Sarah Desmond, executive director of Housing Conservation Coordinators (<http://www.hcc-nyc.org/>) in New York City, an organization that advocates for affordable housing on the west side.

"We see a disproportionate number of studios and one-bedrooms because that is the market for the luxury buildings in Hell's Kitchen," she said.

Catherine Schmitz, a 48-year-old single mother of a 9-year-old son, said she tried applying to every single lottery that opened in the city for more than a year before she finally won a two-bedroom for \$850 a month in Greenpoint in April 2015.

"I was applying every time one came up, every single lottery across the five boroughs," Schmitz said. "I was willing to live anywhere."

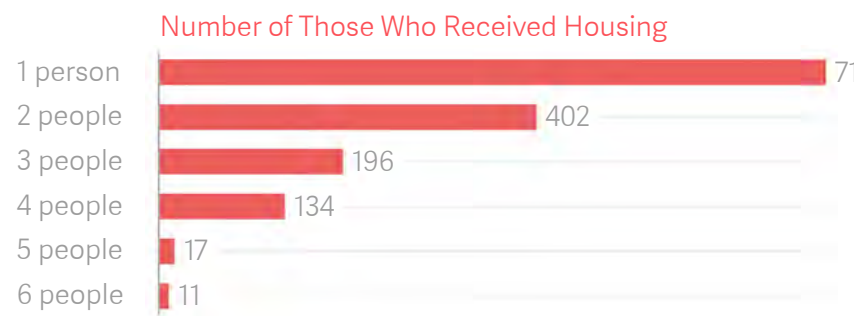
On the other hand, 24-year-old Iyanna Powell, a postal worker from East New York, got her one-bedroom in Livonia Commons in Brownsville, after applying to just one lottery, she said.

"I wanted to leave the nest and get my own space," said Powell, who had been living in her mother's basement until she won her own apartment in August last year.

► Map: What Your Chances of Winning an Affordable Housing Lottery (<https://www.dnainfo.com/new-york/20151027/midtown/map-what-are-your-chances-at-spot-affordable-housing>)

"The lottery gives young people the opportunity to be on their own," she continued. "Now I'm able to live on my own and I don't have to stress myself out about where I'm going to lay my head at. I just turn the key of my apartment."

Affordable Housing Winners by Household Size



ATLAS Data: NYC Housing Preservation and Development Share

Both Powell and Schmitz agreed that those who already live in the neighborhood of the unit they're applying for have a better chance of winning.

Schmitz had lived in Greenpoint for 30 years before she won her new digs, and Powell was living with her family in nearby East New York. In many lotteries, HPD offers priority to those who already live in the community district where they're applying.

"It helped that I lived in the same neighborhood," Powell said. "My mom's house is a block from my apartment. It's so convenient because I didn't want to get an apartment far from my family."

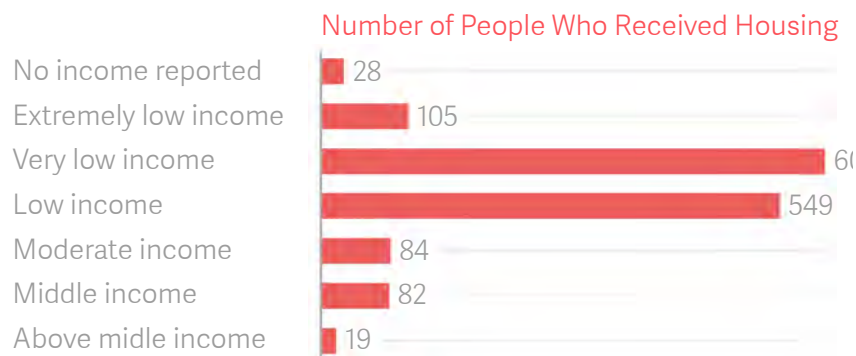
► One Woman's Secret to Winning the City's Affordable Housing Lottery (<https://www.dnainfo.com/new-york/20161014/greenpoint/housing-connect-hpd-affordable-housing-real-estate>)

Once an applicant is deemed eligible, HPD will schedule an interview, which isn't necessarily what you would expect, Schmitz said.

"No person asked me questions. I had to fill out a lot of forms. ... It's all about financials," she said. "If you're 5 cents off in the numbers that they need, then you're out because so many people are looking for affordable housing."

► **How to Apply for Affordable Housing in New York City**
 (<https://www.dnainfo.com/new-york/20160302/upper-west-side/how-apply-for-affordable-housing-new-york-city>)

Affordable Housing Winners by Income



△ T L △ S Data: NYC Housing Preservation and Development Share

Schmitz called the process "grueling" because even after you win the apartment, you might be called on to prove your eligibility again in a year or two.

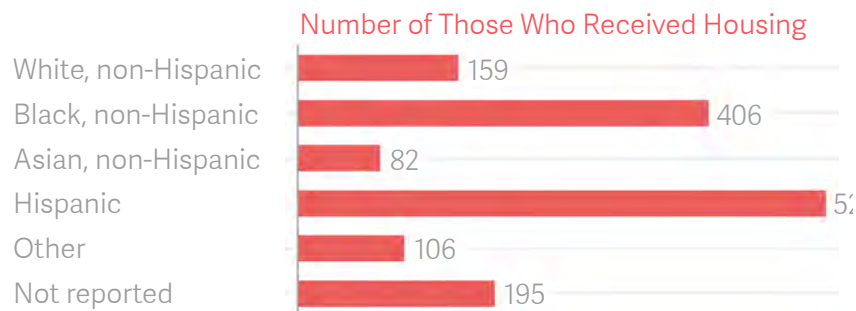
"Certain affordable housing programs, such as low-income housing tax credits and Section 8, require residents to fill out an annual recertification so that the owner of the building may submit compliance information to the relevant agency," HPD spokeswoman Juliet Pierre-Antoine said in an email.

"Applicants who have to recertify are not re-evaluated for tenancy based on this (i.e., a change in income or household size will not affect their tenancy)."

Some eligibility requirements may also be determined by landlords, Pierre-Antoine said. Developers have the right to set what credit score minimum they'll take for a tenant. For instance, they might require a credit score of 580 or more, without looking into the details of the person's credit history.

But there is no minimum credit score that, alone, could disqualify someone, Pierre-Antoine said.

Affordable Housing Winners by Race



△ T L △ S Data: NYC Housing Preservation and Development Share

The city's housing lottery process requires people to apply online through Housing Connect and development in general tends to be geared toward younger people, leaving older residents who aren't as internet-savvy in the dark, Desmond said.

"This neighborhood market is targeted for single professionals, not necessarily families. The bulk of units at developments are skewed toward singles," she continued.

"If there is a higher proportion of young singles in the applicant pool, it's likely because they have more access to the information and to the Housing Connect website. This speaks to a need for greater outreach."

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