UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YOR		ELECTRONICALLY FIL DOC #:DATE FILED: 12-18-18
SHAUNA NOEL, et al	Λ	
	Plaintiffs,	OPINION AND ORDER
-against-		15-cv-05236 (LTS) (KHP)
CITY OF NEW YORK,		
	Defendant.	
KATHARINE H PARKER LINITED S	X :TATFS MAGISTRATI	F IUDGE:

Plaintiffs commenced this action to challenge a New York City policy regarding affordable housing lotteries. The City's policy allocates 50% of units in affordable housing lotteries to individuals who already reside in the community district where the new affordable housing units are located. This policy is referred to herein as the "Community Preference Policy." Plaintiffs allege that the Community Preference Policy violates the federal Fair Housing Act ("FHA"), 42 U.S.C. § 3604 *et seq.*, and the New York City Human Rights Law ("NYCHRL"), NYC Admin. Code § 8-107, *et seq.*, because it perpetuates racial segregation and disparately impacts racial minorities. They also claim that the City's decision to establish, expand, and maintain the policy constitutes intentional discrimination.

Currently pending before this Court is Plaintiffs' motion challenging privilege designations on 500 documents in the City's privilege log. The City asserts that the documents are protected from disclosure based on one or more of the following reasons: (1) attorney-client privilege, (2) work product protection, (3) deliberative process privilege, and (4)

legislative privilege. This Court assumes the reader's familiarity with the factual background of this case based on its many decisions in this action and does not repeat it here. *See Winfield v. City of New York*, No. 15-cv-5236 (LTS) (KHP), 2017 WL 5664852, at *1-6 (S.D.N.Y. Nov. 27, 2017); *Winfield v. City of New York*, No. 15-cv-5236 (LTS) (DCF), 2016 WL 6208564, at *1-3 (S.D.N.Y. Oct. 24, 2016); *see also Winfield v. City of New York*, No. 15-cv-5236 (LTS) (KHP), 2017 WL 2880556, at *1-2 (S.D.N.Y. July 5, 2017), objections overruled by, 2017 WL 5054727, at *1-2 (S.D.N.Y. Nov. 2, 2017).

The City submitted for *in camera* review a detailed privilege log with hyperlinks to all 500 documents and, in some cases, cover emails for the documents. The City also submitted a series of letters at this Court's request providing greater detail as to the basis for the assertion of privilege as to certain documents and categories of documents. In addition, after questions by the Court as to certain documents, the City withdrew its privilege designations and elected to produce these documents.¹

In addition, the Court is in receipt of the ruling of the Honorable Laura Taylor Swain dated December 12, 2018 setting aside this Court's February 2018 Order insofar as it addressed claims of deliberative process privilege. *See* ECF Nos. 259, 655. This Court has, consistent with Judge Swain's ruling, evaluated the City's claims of deliberative process privilege and whether disclosure is warranted under the factors set forth in *Rodriguez v. Pataki*, 280 F. Supp.2d 89, 99-

¹ The documents the City has decided to produce are identified on the privilege log in column A as numbers: 1, 5, 13, 14, 24, 65, 66, 72, 74, 75, 95, 106, 107, 108, 119, 124, 125, 130, 147, 233, 255, 303, 307, 328, 333, 341, 345, 353, 354, 360, 362, 372, 373, 374, 376, 378, 380, 382, and 499. Certain of these documents will be produced in redacted format.

101 (S.D.N.Y. 2003), in the manner prescribed by Judge Swain. This Court has adopted the same methodology for evaluating whether documents subject to the legislative privilege should nevertheless be produced pursuant to the *Rodriguez* balancing factors. Because this Court has previously set forth the standards governing applicability of the attorney-client privilege and work product privilege, it does not repeat them in detail here and refers the parties to the Court's prior decision. *See* ECF No. 259.

The Court has carefully reviewed all of the submissions by the parties and all 500 documents. In the interest of brevity and expediency, the Court does not discuss its reasoning as to each of the 500 documents here. Instead, the Court discusses treatment of certain categories of documents and provides an annotated spreadsheet providing additional information about each document and its rulings as to each.

Discussion

I. Attorney-Client Privilege

The attorney-client privilege "exists for the purpose of encouraging full and truthful communications between an attorney and his client and 'recognizes that sound legal advice or advocacy serves public ends and that such advice or advocacy depends upon the lawyer's being fully informed by the client." *In re Von Bulow*, 828 F.2d 94, 100 (2d Cir. 1987) (quoting *Upjohn Co. v. United States*, 449 U.S. 383, 389 (1981)). The party seeking to invoke the privilege bears the burden of establishing its applicability. *In re Cty. of Erie*, 473 F.3d 413, 418 (2d Cir. 2007). To do this, the governmental party claiming attorney-client privilege must establish: (1) a communication between government counsel and their clients, (2) that was intended to be and

was in fact kept confidential, and (3) was made for the purpose of obtaining or providing legal advice. *See id.* at 419 (internal citation omitted). As to factor 3, the key inquiry is whether the "predominant purpose" of the communication is to solicit or provide legal advice. *Id.* at 419-20 (collecting cases). When legal advice is the predominant purpose, "other 'considerations and caveats' are not severable and the entire communication is privileged." *Fox News Network, LLC v. US Dep't of Treasury*, 739 F. Supp. 2d 515, 560 (citing *In re Cty. of Erie*, 473 F.3d at 420). On the other hand, if the legal advice is merely "incidental to the nonlegal advice that is the predominant purpose of the communication," then the legal portions of the document may be redacted. *In re Cty. of Erie*, 473 F.3d at 420 n.8.

With these standards in mind, the following documents on the City's privilege log are protected by the attorney-client privilege: 3, 4, 18, 19, 22, 23, 25, 26², 27, 38, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 42, 44, 51, 53, 59, 60, 69, 70, 71, 80, 92, 93, 94, 96, 97, 98, 100, 109, 110, 113, 114, 120, 122, 123, 126, 136, 139, 140, 142, 159, 163, 175, 178, 190, 193, 194, 216, 218, 232, 235, 238, 239, 240, 241, 242,245, 248, 250, 251, 256, 266, 274, 275, 287, 288, 295, 298, 300, 306, 346, 349, 357, 359, 361, 363, 364, 470, 472, 476, 478, 480, 485. All of these documents involve communications and draft documents exchanged between attorneys for the City and their clients for the predominant purpose of seeking or conveying legal advice. Because the attorney-client privilege applies, the Court does not need to reach any other privilege asserted. The following documents are not protected by the attorney-client privilege

² A substantial portion of the communications in this document are not privileged. The City shall produce a redacted version of this document redacting the limited portions that relate to topics on which legal advice is sought or given.

but, if subject to another privilege, are identified in the appropriate section below: 0, 4, 13, 43, 46, 95, 128, 130, 141, 165, 166, 176, 186, 233, 253, 254, 255, 260, 261, 263, 264, 265, 273, 279, 282, 284, 289, 291, 292, 293, 321, 342, 353, 360, 477, 499. These documents do not reflect communications or drafts exchanged between attorneys for the City and their clients for the predominant purpose of seeking or conveying legal advice.

II. Work Product

The work product doctrine protects a broader category of documents and communications than the attorney-client privilege. Specifically, it protects documents and other tangible things "that are prepared in anticipation of litigation or for trial by or for a party or its representative." Fed. R. Civ. P. 26(b)(3)(A); see also Bowne of N.Y.C., Inc. v. AmBase Corp., 150 F.R.D. 465, 471 (S.D.N.Y. 1993). Documents "should be deemed prepared 'in anticipation of litigation' . . . if, 'in light of the nature of the document and the factual situation in the particular case, the document can fairly be said to have been prepared or obtained because of the prospect of litigation." United States v. Adlman, 134 F.3d 1194, 1202 (2d Cir. 1998) (emphasis in original) (internal citation omitted). "Where a document was created because of anticipated litigation, and would not have been prepared in substantially similar form but for the prospect of that litigation," it is protected as work product. Id. at 1195. "Conversely, protection will be withheld from 'documents that are prepared in the ordinary course of business or that would have been created in essentially similar form irrespective of litigation." Schaeffler v. United States, 806 F.3d 34, 43 (2d Cir. 2015) (quoting Adlman, 134 F.3d at 1202).

Work product protection, however, is not absolute. A party seeking discovery may overcome work product protection and obtain disclosure of material otherwise discoverable under Fed. R. Civ. P. 26(b)(1) by showing (1) substantial need for the material; and (2) an inability to obtain its substantial equivalent from another source without undue hardship. Fed. R. Civ. P. 26(b)(3)(A); *Obeid v. Mack,* No. 14-cv-6498 (LTS) (HBP), 2016 WL 7176653, at *5 (S.D.N.Y. Dec. 9, 2016). Although factual materials "may generally be discovered upon a showing of substantial need," *Obeid*, 2016 WL 7176653, at *5 (internal quotation marks and citations omitted), courts "must protect against disclosure of the mental impressions, conclusions, opinions, or legal theories of a party's attorney or other representative concerning the litigation." Fed. R. Civ. P. 26(b)(3)(B) (emphasis added). "Documents or portions of documents that qualify as 'opinion work product' are 'entitled to virtually absolute protection.'" *United States v. Mount Sinai Hosp.*, 185 F. Supp. 3d 383, 390 (S.D.N.Y. 2016) (quoting *United States v. Ghavami*, 882 F. Supp. 2d 532, 540 (S.D.N.Y. 2012)).

With these standards in mind, the following documents on the City's privilege log are protected by the work product doctrine: 6, 7, 8, 10, 11, 15, 16, 17, 47, 61, 76, 77, 78, 79, 81, 82, 85, 86, 89, 104, 118, 127, 129, 131, 133, 134, 135, 137, 138, 141, 149, 150, 151, 153-158, 160, 161, 162, 164, 165, 166, 167, 169, 170, 171, 172, 177, 182, 183, 184, 185, 188, 191, 192, 195-201-211, 220-230, 281, 366-371, 375, 377, 379, 381, 383-464, 466-469, 483, 484, 486-493, 498, 500. All of these documents were prepared in anticipation of this litigation or litigation with the U.S. Department of Housing and Urban Development ("HUD") and not in the normal course of business. Of these documents, a number contain mental impressions, analyses or studies,

conclusions, opinions, or legal theories of an attorney or other representative of the City concerning this litigation or potential litigation with HUD over the Community Preference Policy. A number of the documents were created solely for analyzing settlement positions. Having reviewed these documents, the Court finds there is no substantial need for the documents and, indeed, the vast majority reflect core work product that must be protected regardless under Federal Rule of Civil Procedure 26(b)(3). *See Adlman*, 134 F.3d at 1196 (The work product doctrine "is intended to preserve a zone of privacy in which a lawyer can prepare and develop legal theories and strategy with an eye toward litigation, free from unnecessary intrusion by his adversaries") (internal quotation marks omitted).

Additionally, with respect to documents reflecting settlement negotiations, proffers and strategy, the Court notes that such documents are inadmissible at trial under Federal Rule of Evidence 408 as evidence of the admission of the validity or invalidity of a claim. Fed. R. Evid. 408. The rationale behind the rule is that settlement proposals are irrelevant, as they "may be motivated by a desire for peace rather than from any concession of weakness of position" and "to promote settlement of disputes." 1972 Advisory Committee Notes to Rule 408; see also Fed. R. Civ. P. 68 (evidence of an unaccepted offer of judgment is not admissible as evidence of liability). Rule 408 does permit admission of information that would prove bias of a witness, negate a contention of undue delay, or prove an effort to obstruct a criminal investigation or prosecution. Fed. R. Evid. 408; 1972 Advisory Committee Notes to Rule 408. The 2006 Advisory Committee Notes to Rule 408 explicitly state that the rule "prohibits use of statements made in settlement negotiations to impeach by prior inconsistent statement or through contradiction."

2006 Advisory Committee Notes to Rule 408 (citing *EEOC v. Gear Petroleum, Inc.*, 948 F.2d 1542 (10th Cir. 1991) (letter sent as part of settlement negotiation cannot be used to impeach defense witnesses by way of contradiction or prior inconsistent statement; such broad impeachment would undermine the policy of encouraging uninhibited settlement negotiations)). Based on this Court's review of the documents concerning settlement, it is the Court's view that they could not be appropriately used for any permitted purpose under Federal Rule of Evidence 408. Therefore, they are protected from disclosure.

The following documents are not work product: 5, 24, 73, 106, 124, 125, 180, 181, 253, 254, 255, 260, 261, 328, 372, 373, 374, 376, 378, 380, 382, 499. The City acknowledged that some of these documents were not protected work product. Other documents include final versions (or portions thereof) of the City's consolidated plans concerning fair housing submitted to HUD and a factual communication to the Mayor about the filing of this litigation.

Accordingly, the City must produce these documents to the extent they are not protected by another privilege. To the extent any of these documents are also marked as being protected by the deliberative process or legislative privilege, they are addressed below.

III. Deliberative Process Privilege

The deliberative process privilege, also referred to as the executive privilege, protects "documents reflecting advisory opinions, recommendations and deliberations comprising part of a process by which governmental decisions and policies are formulated." *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 150 (1975) (internal quotation marks and citation omitted). It applies to both the ultimate decision-making executive and the executive's staff members. *See*

Hopkins v. H.U.D., 929 F.2d 81, 85 (2d Cir. 1991) (work product, opinions, and recommendations of staff are covered by the deliberative process privilege).

To be protected, the documents and communications used in the decision-making process must be both (1) pre-decisional and (2) deliberative. *Marisol A. v. Guiliani*, No. 95-cv-10533 (RJW), 1998 WL 132810, at *6 (S.D.N.Y. Mar. 23, 1998). This means the document must be prepared to aid the decisionmaker in arriving at a decision as opposed to communications that are part of routine agency self-evaluation. *See, e.g., Hopkins*, 929 F.2d at 84; *Marisol A.*, 1998 WL 132810, at *6; *Tigue v. U.S. Dep't of Justice*, 312 F.3d 70, 80 (2d Cir. 2002); *see also Charles v. City of New York*, No. 11-cv-0980 (KAM) (JO), 2011 WL 5838478, at *1 (E.D.N.Y. Nov. 18, 2011).

Even if a document is protected by the deliberative process privilege, a Court may order disclosure after balancing the following five factors and finding that they weigh in favor of disclosure: (i) the relevance of the evidence sought to be protected; (ii) the availability of other evidence; (iii) the 'seriousness' of the litigation and the issues involved; (iv) the role of the government in the litigation; and (v) the possibility of future timidity by government employees who will be forced to recognize that their secrets are violable. *See* ECF 655 (citing Rodriguez, 280 F. Supp. 2d at 99-101); *see also In re Delphi Corp.*, 276 F.R.D. 81, 85 (S.D.N.Y. 2011); *Five Borough Bicycle Club v. City of New York*, No. 07-cv-2448 (LAK), 2008 WL 4302696, at *1 (S.D.N.Y. Sept. 16, 2008).

With these standards in mind, the following documents on the City's privilege log are protected by the deliberative process privilege: 9, 12, 21, 34, 41, 45, 48, 52, 63, 68, 83, 84, 87,

88, 90, 91, 103, 105, 115, 116, 117, 132, 143, 145, 146, 148, 152, 168, 174, 176, 187, 189, 202, 215, 217, 234, 236, 237, 243, 244, 246, 249, 252, 257, 258, 262, 267, 268, 270, 271, 272, 276, 277, 278, 280, 283, 285, 286, 290, 293, 294, 296, 301, 305, 308, 314, 315, 316, 317-320, 322, 323, 324, 325, 326, 329, 330, 331, 332, 334, 335, 336, 337, 338, 339, 340, 348, 351, 355, 358, 465, 473, 477, 494, 496, 497. All of these documents precede a policy or other decision by a City agency and reflect the deliberative process in reaching the decision. *See Marisol A.*, 1998 WL 132810, at *6. None appear to be routine self-evaluation. On the other hand, the following documents do not reflect any pre-decisional deliberative process and fall into the category of post-decision communications, post-decision strategy for implementation of decided policy, factual information or routine self-evaluation by an agency: 20, 54, 56, 57, 58, 64, 101, 111, 112, 144, 212, 213, 214, 247, 297, 304, 310, 313, 341, 343, 350, 356, 465, 471, 475, 479, 495. Thus, these documents are not protected by the deliberative process privilege and must be disclosed by the City.

With respect to those documents that are protected by the deliberative process privilege, the Court has applied the five-factor balancing analysis in the manner prescribe by Judge Swain in her December 12, 2018 decision and determined that the following documents need not be produced: 9, 21, 34, 41, 45, 48, 52, 63, 83, 84, 87, 88, 90, 91, 103, 105, 115, 116, 117, 132, 143, 148, 152, 168, 174, 176, 187, 202, 215, 217, 234, 236, 237, 243, 244, 246, 249, 252, 257, 258, 262, 267, 268, 270, 271, 272, 276, 277, 278, 280, 283, 285, 286, 290, 293, 294, 296, 301, 308, 310, 314, 315, 316, 317-320, 322, 323, 324, 325, 326, 329, 330, 331, 332, 334, 335, 336, 337, 338, 339, 340, 348, 473, 477, 494, 496, 497. Many of these documents are drafts that are not

relevant or have marginal relevance and thus I give them little weight in the balancing test.

Likewise, the availability of a final policy and other information about a policy weighs against disclosure. When evaluating the first four factors together against the fifth *Rodriguez* factor, I find that the balance of factors weighs against disclosure of these documents.

On the other hand, the five-factor balancing analysis weighs in favor of disclosure as to the following documents: 12, 68, 145, 146, 189, 277, 305, 351, 355, 358. As to these documents, the relevance factor weighs heavily in favor of disclosure and outweighs the other factors, thereby requiring disclosure.

IV. Legislative Privilege

State and local legislators are entitled to absolute "immunity from liability for their legislative acts" as a matter of federal common law. *Supreme Ct. of Virginia v. Consumers Union of U.S. Inc.*, 446 U.S. 719, 732-33 (1980) (citing *Tenney v. Brandhove*, 341 U.S. 367, 379 (1951)); *Bogan v. Scott-Harris*, 523 U.S. 44, 48-49 (1988); *see also Rodriguez*, 280 F. Supp. 2d at 94-95. Courts within the Second Circuit have repeatedly held that state and local lawmakers are entitled to protection against discovery into their legislative acts in civil cases, explaining that such protection is needed to "shield legislators from civil proceedings which disrupt and question their performance of legislative duties to enable them to devote their best efforts and full attention to the public good." *See, e.g., Searingtown Corp. v. Inc. Vill. of N. Hills*, 575 F.

Supp. 1295, 1299 (E.D.N.Y. 1981) (precluding discovery into motivation of local legislators for rezoning decision that plaintiffs claimed violated their constitutional rights) (internal quotation marks and citations omitted); *ACORN v. Cty. of Nassau*, No. 05-cv-2301 (JFB) (WDW), 2007 WL

2815810, at *2 (E.D.N.Y. Sept. 25, 2007); see also In Vill. of Arlington Heights v. Metro. Hous.

Dev. Corp., 429 U.S. 252, 267-68 (1977) (recognizing in dicta that the common law legislative privilege also extends to protection from compelled testimony in civil cases); Star Distribs., Ltd. v. Marino, 613 F.2d 4, 6-9 (2d Cir. 1980).

Legislative acts that are protected under the privilege include any activity that is an integral part of the deliberative and communicative processes by which an individual considers whether to vote for or against a proposal. *See Eastland v. U.S. Servicemen's Fund,* 421 U.S. 491, 504 (1975); *Bogan*, 523 U.S. at 54-55. For example, legislative acts may include, but are not limited to: "delivering an opinion, uttering a speech, or haranguing in debate; proposing legislation; voting on legislation; making, publishing, presenting, and using legislative reports; authorizing investigations and issuing subpoenas; and holding hearings and introducing material at committee hearings." *S.E.C. v. Comm. On Ways and Means of the U.S. House of Representatives*, 161 F. Supp. 3d 199, 236 (S.D.N.Y. 2015) (citing *Fields v. Office of Eddie Bernice Johnson*, 459 F.3d 1, 10-11 (D.C. Cir. 2006)) (internal quotation marks omitted).

The legislative privilege also protects formal and informal fact and information-gathering activities about the subject of potential legislation, as well as documents regarding or reflecting the fruits of this research. *See id.* at 236-37, 245; *see also United States v. Biaggi*, 853 F.2d 89, 102-03 (2d Cir. 1988); *McSurely v. McClellan*, 553 F.2d 1277, 1286 (D.C. Cir. 1976) (en banc), *cert. dismissed* 438 U.S. 189 (1978). The privilege does not attach to activities concerning the administration of a law, speeches delivered outside of the legislative body and preparation for the same, the making of appointments with government agencies, and

newsletters and press releases to constituents. *See U.S. v. Brewster,* 408 U.S. 501, 512 (1972); *Hutchinson v. Proxmire*, 443 U.S. 111, 130-33 (1979).

Like the deliberative process privilege, the legislative privilege is qualified, and disclosure may be ordered subject to the same balancing factors applicable to the deliberative process privilege. *Rodriguez*, 280 F. Supp. 2d at 96; *see also Citizens Union of City of N.Y. v.*Att'y Gen. of N.Y., No. 16-cv-9592 (RMB) (KHP), 2017 WL 3836057, at *18 (S.D.N.Y. Sept. 1, 2017).

Applying these standards, this Court finds that none of the documents the City listed as protected by the legislative privilege in fact fall within the protection of this privilege. These documents are: 49, 55, 98, 99, 102, 179, 345. Thus, the City shall produce all of these documents.

Conclusion

The Court appends a spreadsheet reflecting the Court's rulings on the 500 documents. The Court also includes its own description of the documents in column R. The City is directed to re-review its privilege log consistent with this ruling and determine whether there are additional documents on its log that must be de-designated as privileged. The City shall complete this task by January 31, 2019 and provide Plaintiffs with an updated log and supplemental production by that date.

To the extent there are objections to this ruling, or Plaintiffs believe that the Court should re-evaluate the balance of *Rodriguez* factors or wish to make a substantial need argument as to a specific document protected by the work product doctrine, this Court

requests that the parties first file a motion for reconsideration with this Court. The parties shall

notify the Court by letter if they intend to request reconsideration of a ruling as to a particular

document by December 31, 2018. The Court will then set a briefing schedule as to any such

motion. To the extent the City does not dispute this Court's ruling with respect to documents

deemed non-privileged, it shall produce such documents by January 31, 2019.

SO ORDERED.

Dated: December 18, 2018

New York, New York

KATHARINE H. PARKER

United States Magistrate Judge

Kathaine H Parker

14

	Production				Court	Court's Summary
	Beginning					Description of Nature of
Sort	Bates	Control ID	Privilege(s)	Categorical Description	n	Document
0		NYCPRIVO 3014	Attorney Client;Deliberative	Draft Internal Memorandum re: AFFH and Community Preference	NP	communication among counsel and others re: delegation of responsibilities for responding to plaintiff's counsel letter re: fair housing policies
				Draft talking points re:		
1	NYC 0067299		Deliberative	421-a - Homeless Preference	NP	Per City's Agreement
	NYC_0067300		Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	, s. s., g. sessess
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3		NYCPRIVO 0004	Attorney Client	Email chain re: Application of Community Preference	AC	communication with counsel and others re: requests to include prior residents in community preference; identifying issue for legal advice
4		NYCPRIVO 0014	Attorney Client;Deliberative	Email chain re: Community Opposition Strategies	AC & DPP	communications with counsel and others about strategy and potential positions in advance of REBNY Meeting;
		NYCPRIV0		Email chain re: Litigation -		
5		0015	Work Product	Winfield Litigation	NP	Per City's Agreement
6		NYCPRIVO 0016	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference	WP & DPP	Settlement Options Analysis
7		NYCPRIVO 0017	Deliberative;Work Product	Draft Internal Memorandum re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	Settlement Options Analysis
8		NYCPRIVO 0018	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference	WP & DPP	Settlement Options Analysis
9		NYCPRIVO 0023	Deliberative	Draft Internal Memorandum re: 421-a - Homeless Preference	DPP	Draft decision memo to mayor regarding homeless unit commitment

	1					Communication shout
						Communication about
						preparation for legal
		NIVCDDIVO		Empilobaio vas Litigation		strategy meeting with
10		NYCPRIV0	Mark Dradust	Email chain re: Litigation -	\A/D	Mayor about this
10		0025	Work Product	Winfield Litigation	WP	litigation
				Draft procentation re-		
				Draft presentation re:		
				Litigation - Anticipated		
		NIVCDDIVO		Litigation re: Community	M/D 0	Litiaatiaa Chastaa.
		NYCPRIV0	Balthandt a Mad Bard at	Preference;Litigation -	WP &	Litigation Strategy
11		0026	Deliberative;Work Product	Winfield Litigation	DPP	Document
						aa manunisatian raaardina
						communication regarding
		AUVCDDU VO		Faciliates and A24		potential policy re: 421a
12		NYCPRIVO	Daliba and	Email chain re: 421-a -	DDD	units; PRODUCE UNDER
12		0047	Deliberative	Homeless Preference	DPP	RODRIGUEZ
				Draft talking points re:		
				MIH - Anti-displacement		
		NYCPRIV0		strategies;Anti-		
13		0061	Attorney Client		NP	Per City's Agreement
				Draft talking points re:		
				MIH - mobility;MIH -		
				Community		
		NYCPRIV0		opposition;MIH - City		
14	NYC_0083074	0063	Deliberative;Legislative	council input	NP	Per City's Agreement
						Communication about
		NYCPRIV0		Email chain re: Litigation -		work needed to inform
15		0067	Work Product	Winfield Litigation	WP	legal strategy
		NYCPRIV0		Draft report re: Litigation -		
16		0068	Deliberative;Work Product	Winfield Litigation	WP	Litigation Strategy memo
				Dueft assessment this series		
				Draft report re: Litigation -		
				Winfield		
		NYCPRIV0		Litigation; Application of	WP &	Settlement Options
17		0069	Deliberative;Work Product	Community Preference	DPP	Analysis
				Draft Internal		
				Memorandum re: MIH -		
				Anti-displacement		
				strategies; Litigation -		
				Anticipated Litigation re:		
				Community		
				Preference;Litigation -		draft decision memo to
			Attorney	Winfield		mayor re: rezonings in
		NYCPRIV0	Client;Deliberative;Work	Litigation;Community		specific neighborhoods
18		0074	Product	Opposition Strategies	AC	containing legal advice
				Draft Internal		
				Memorandum re: MIH -		
				Anti-displacement		
				strategies; Litigation -		
				Anticipated Litigation re:		
				Community		
				Preference;Litigation -		draft decision memo to
			Attorney	Winfield		mayor re: rezonings in
		NYCPRIV0	Client;Deliberative;Work	Litigation; Community		specific neighborhoods
19	19	NYCPRIVO 0075	Client;Deliberative;Work Product		AC	specific neighborhoods containing legal advice

	1		II.	1	1	T T
				Final talking points (non-		
				public) re: MIH - Anti-		internal documents
				displacement		setting forth admin.
		NYCPRIV0		strategies;MIH - City		position to certain issues;
20		0083	Deliberative;Legislative	council input	NP	shared with CM
			, 5	·		
						draft considerations for
						potential modification to
		NYCPRIV0		Draft rapart ray MIH City		•
2.4			Daltha and a Lastalada	Draft report re: MIH - City	000	MIH; DO NOT PRODUCE
21		0095	Deliberative;Legislative	council input	DPP	UNDER RODRIGUEZ
						Attorney comments on
						draft advertisement for
						housing on West 42nd St.
				Draft Document re: 421-a -		sent to another City
22	NYC 0032942		Attorney Client	2015/2016 revision	AC	lawyer for further review
	1110_0032312		recorney eneme	2013/2010 (2013)011	7.0	lawyer for farther review
						communication with
						communication with
						attorney and others
						concerning use of
						marketing bands for
						specific housing project;
		NYCPRIVO		Email chain re: Application		highlighting legal issues
23		0425	Attorney Client		AC	with proposed approach
			,	,	_	r p spesses spp ses
		NYCPRIV0		Email chain re: Litigation -		
24		0435	Work Product		NP	Dor Cityle Agreement
24		0435	Work Product	Winfield Litigation	INP	Per City's Agreement
						draft language regarding
						housing ad sent to
		NYCPRIV0		Email chain re: Application		counsel for legal review
25		0474	Attorney Client	of Community Preference	AC	and comment
						internal communications
						describing issue on which
						~
						legal advice sought
						pertaining to lotteries can
						be redacted; document
		NYCPRIV0		Email chain re: 421-a -	AC in	otherwise must be
26		2106	Attorney Client; Deliberative	Homeless Preference	part	produced
						communications with
]	attorney and others
]	· ·
		NIVCDDIVC		Forest about the A. M. C.		concerning modifications
		NYCPRIV0		Email chain re: Application		to CPP in context of
27		0482	Attorney Client; Deliberative	of Community Preference	AC	preservation projects
						communications with
						attorney and others
						concerning modifications
		NYCPRIV0		Email chain re: Application		to CPP in context of
28		0483	Attorney Client; Deliberative		AC	preservation projects
28		0405	Attorney chem, Deliberative		AC	
				Draft report re: 421-a -	 	attorney summary and
29	NYC_0033138		Attorney Client; Deliberative	2015/2016 revision	AC	advice re: 421-a

	T .	1	1			Dueft of decourage
						Draft of document
						concerning homeless
				Draft talking points re:		referrals to 421-a
		NYCPRIV0		421-a - Homeless		projects reflecting legal
30		0501	Attorney Client	Preference	AC	advice
				Email chain re: 421-a -		
				Homeless		communications
		NYCPRIV0		Preference; Application of		reflecting legal advice re:
31		2108	Attorney Client; Deliberative	Community Preference	AC	421-a
						Draft of documents
						concerning homeless
				Draft talking points re:		referrals to 421-a
		NYCPRIV0		421-a - Homeless		projects reflecting legal
32		0106	Attorney Client; Deliberative	Preference	AC	advice sought
32		0100	According Chemi, Deliberative	Treference	7.0	emails with counsel and
						others; seeking legal
						advice in context of this
						litigation on
						communications plan re:
		NYCPRIV0		Email chain re: 421-a -		homeless referrals to 421-
33		0108	Attorney Client; Deliberative	Homeless Preference	AC	a projects
						draft document
						containing comments re:
						homeless prevention
						policy and 421-a housing;
		NYCPRIVO		Draft Document re: 421-a -		DO NOT PRODUCE
		INTERMINO		Diant Document ic. 421 a		DO NOT I NODOCL
34		0536	Deliberative	Homeless Preference	DPP	UNDER RODRIGUEZ
34			Deliberative		DPP	
34			Deliberative		DPP	UNDER RODRIGUEZ
34			Deliberative	Homeless Preference	DPP	UNDER RODRIGUEZ Attorney draft of
34		0536		Homeless Preference Draft talking points re: 421-a - Homeless	DPP AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-
		0536 NYCPRIVO	Deliberative Attorney Client	Homeless Preference Draft talking points re:		UNDER RODRIGUEZ Attorney draft of documents discussing
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless Preference		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421- a projecs Communications with counsel and counsel's
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re:		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs
35		0536 NYCPRIVO	Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless	AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to
35	NYC_0033169	0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs
35		0536 NYCPRIVO	Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a -	AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects
35		0536 NYCPRIVO 0117	Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless	AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with
35		NYCPRIVO 0117 NYCPRIVO	Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to
35		0536 NYCPRIVO 0117	Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless	AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with
35		NYCPRIVO 0117 NYCPRIVO	Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook
35		NYCPRIVO 0117 NYCPRIVO 0609	Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421- a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to
35		NYCPRIVO 0117 NYCPRIVO 0609	Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re:
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re:
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611 NYCPRIVO	Attorney Client Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re: homeless referrals to 421-
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611 NYCPRIVO	Attorney Client Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re: homeless referrals to 421-
35 36 37		NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611 NYCPRIVO	Attorney Client Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re: homeless referrals to 421-a projects
35 36 37	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611 NYCPRIVO 0613	Attorney Client Attorney Client Attorney Client Attorney Client	Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference Draft Document re: 421-a - Homeless Preference	AC AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re: homeless referrals to 421-a projects Attorney draft of report

					.
					internal working draft
					reflecting tentative
					positions on HPD RFPs
			Draft Document re: Anti-		and involvement in
			displacement		neighborhood studies;
	NYCPRIV0		strategies;Community		DO NOT PRODUCE
41	2115	Deliberative	Opposition Strategies	DPP	UNDER RODRIGUEZ
					Draft memo re: 421-a for
	NYCPRIVO		Draft talking points re:		which legal review is
42	0637	Attorney Client	421-a - 2007 revision	AC	requested
		·			not conveying legal
	NYCPRIVO		Final letter (non-public) re:		advice or seeking legal
43	0644	Attorney Client	421-a - 2007 revision	NP	advice
43	0044	Attorney Chefit	421-a - 2007 Tevision	INF	
	NIV CDDII (O		Dark David and		Draft of Marketing
	NYCPRIV0		Draft Document re:		Guidelines containing
44	0665	Attorney Client; Deliberative	Marketing guidelines	AC	counsel's comments
					draft marketing
					guidelines to be
					submitted to legal for
					review and approval; DO
	NYCPRIVO		Draft Document re:		NOT PRODUCE UNDER
45	0666	Deliberative	Marketing guidelines	DPP	RODRIGUEZ
43	0000	Deliberative	Warketing guidenies	DII	NODNIGOEZ
			Email chain re: Anti-		sammunisation with
					communication with
			displacement		counsel and others re:
	NYCPRIVO		strategies;Application of		CPP; not seeking or
46	0668	Attorney Client	Community Preference	NP	reflecting legal advice
			Draft letter re: Litigation -		
	NYCPRIVO		Anticipated Litigation re:	WP &	Draft letter to HUD re:
47	0676	Deliberative;Work Product	Community Preference	DPP	potential settlement
		·	,		
					draft strategy document
					concerning 10-year
					affordable housing plan
			Due fil and a state of		
	AU (00 - :: :-		Draft report re:		in East New York; DO
	NYCPRIV0		Application of Community		NOT PRODUCE UNDER
48	0686	Deliberative	Preference	DPP	RODRIGUEZ
					internal strategy
			Draft talking points re:		document regarding East
	NYCPRIVO		ENY - Anti-displacement		New York development
49	0768	Legislative	strategies	NP	issues
					not internal -
					communication with city
	NYCPRIVO		Email chain re: Application		counsel;
		Deliberative	Email chain re: Application	ND	courisei,
50	0782	Deliberative	of Community Preference	NP	
					communication to
					counsel and others
					seeking advice re:
					overlapping preference
	NYCPRIV0		Email chain re: Application		categories at a specific
F.4		Attornoy Client Deliberation		۸۲	
51	0783	Attorney Client; Deliberative	of Community Preference	AC	development

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52	NYCPRIVO 0788	Deliberative;Legislative	Draft presentation re: Anti- displacement strategies	DPP	draft internal presentation concerning legislative agenda, positions on 421-a and fall back positions on rent regulation and land tax; DO NOT PRODUCE UNDER RODRIGUEZ
53	NYCPRIVO 0793	Attorney Client;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	AC	communication discussing legal position in response to litigation and upcoming meeting with counsel
54	NYCPRIVO 0799	Deliberative; Legislative	Draft Document re: ENY - Anti-displacement strategies	NP	draft executive summary of affordable housing plan for East New York internal memo re:
55	NYCPRIVO 0827	Legislative	Draft talking points re: Anti- displacement strategies	NP	proposed responses to tenant harassment proposals by progressive caucus
56	NYCPRIVO 0158	Deliberative;Legislative	Email chain re: Anti- displacement strategies	NP	also concerns bill re: harassment of tenants
57	NYCPRIVO 0835	Deliberative; Legislative	Draft talking points re: ENY - Anti-displacement strategies	NP	internal memo reflecting decisionmaking re: issues to address re: East New York development
58	NYCPRIVO 0159	Deliberative	Email chain re: ENY - Anti- displacement strategies;Community Opposition Strategies	NP	internal communications re: East New York development and MIH strategy
59	NYCPRIVO 0839	Attorney Client;Work Product	Email chain re: Litigation - Other;AFFH and Community Preference	AC	document summarizes and conveys legal advice re: Consolidated Plan and ongoing litigation
60	NYCPRIVO 0842	Attorney Client;Work Product	Email chain re: Litigation - Other;AFFH and Community Preference	AC	communication with counsel re: draft 2012 Consolidated Plan to HUD re: AFFH
61	NYCPRIVO 0844	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	Draft response to HUD
62	NYCPRIVO 0846	Deliberative	Draft report re: Antidisplacement strategies; Commitment to Fair Housing	DPP	draft langauge for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ

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				Draft Document re: Anti-		
				displacement		
		NYCPRIV0		strategies;Community		
63		2140	Deliberative	Opposition Strategies	DPP	same as 41
				Draft Document re: MIH -		
				Anti-displacement		
				strategies; ENY - Anti-		internal outline of
				displacement		remaining considerations
		NYCPRIV0		strategies; ENY - City		regarding East New York
64		0881	Deliberative;Legislative	council input	NP	development plan;
		NYCPRIV0		Draft report re: Anti-		
65		0889	Deliberative;Legislative	displacement strategies	NP	Per City's Agreement
		NYCPRIV0		Email chain re: Anti-		
66		0891	Deliberative;Legislative	displacement strategies	NP	Per City's Agreement
				Final presentation (non-		
		NYCPRIV0		public) re: MIH - Anti-		
67		0904	Deliberative	displacement strategies	NP	
						internal communications
						concerning East New york
						development positions;
		NYCPRIVO		Email chain re: ENY - Anti-		PRODUCE UNDER
68		0163	Deliberative	displacement strategies	DPP	RODRIGUEZ
08		0103	Deliberative	displacement strategies	DII	NODNIGOEZ
						communication with
						counsel and others re:
						legal requirements of 421-
						a and applicability of
		NYCPRIV0		Email chain ro: Application		various regulations to
co			Attornov Client	Email chain re: Application	۸.	
69		0690	Attorney Client	of Community Preference	AC	specific development
				Email chain re: 421-a -		
		NIVCDDIVO				
70		NYCPRIVO	Aller of Clark Bulleton	2015/2016 revision;421-a -		1 1 - 1 424 -
70		0972	Attorney Client; Deliberative	Homeless Preference	AC	Legal advice re: 421-a
				Draft Document to: 424 -		
		NIVCDDIVO		Draft Document re: 421-a - 2015/2016 revision;421-a -		
74		NYCPRIV0	Attornous Clients Deliberati	· ·	۸.	Logal advisa ::: 424 -
71		0973	Attorney Client; Deliberative		AC	Legal advice re: 421-a
		NIVCDDIVO		Draft talking points re:		
70		NYCPRIVO	Deliberative	Application of Community	NID	Don Citude Agreement
72		2768	Deliberative	Preference	NP	Per City's Agreement
				Final latter (no. 1919)		
				Final letter (non-public) re:		
				Litigation - Anticipated		
		NYCPRIVO		Litigation re: Community		Letter to HUD providing
73		2163	Work Product	Preference	NP	fact information
				D 6 . H.		
				Draft talking points re:		
				Litigation - Winfield		
		NYCPRIV0		Litigation; Application of		
74		1425	Deliberative	Community Preference	NP	Per City's Agreement

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			Draft talking points re:		
			Litigation - Winfield		
	NYCPRIVO		Litigation; Application of		
75	1426	Deliberative	Community Preference	NP	Per City's Agreement
	_		, , , , , , , , , , , , , , , , , , , ,		,
					communications re: data
					analysis needed to
			Email chain re: Litigation -		determine potential
	NYCPRIVO		Anticipated Litigation re:	WP &	settlement positions with
76	0699	Deliberative;Work Product	Community Preference	DPP	HUD on CPP
		,	,,		Communications
			Email chain re: Litigation -		concerning draft letter to
	NYCPRIVO		Anticipated Litigation re:		HUD and alteneratives to
77	0701	Work Product	Community Preference	WP	СРР
			, , , , , , , , , , , , , , , , , , , ,		Draft analysis of
					measures of
			Draft letter re: Litigation -		demographics within CDs
			Anticipated Litigation re:	WP &	in connection with HUD
78		Deliberative;Work Product	Community Preference	DPP	submission
			Final report (non-public)		
			re: Litigation - Anticipated		internal statistical
	NYCPRIV0		Litigation re: Community		analysis for informing
79	0708	Work Product	Preference	WP	litigation strategy
			Email chain re: Litigation -		Discloses topic of legal
			Anticipated Litigation re:		advice and responses to
		Attorney	Community		Plaintiffs' counsel and
	NYCPRIVO	Client;Deliberative;Work	Preference;Litigation -		draft communication to
80	0709	Product	Winfield Litigation	AC	HUD
			Internal Charts or Maps re:		
			Litigation - Anticipated		
			Litigation re: Community		
	NYCPRIVO		Preference;Litigation -	WP &	analysis to inform legal
81	0719	Deliberative;Work Product	Winfield Litigation	DPP	strategy
					communications re: data
					analysis needed to
			Email chain re: Litigation -		determine potential
	NYCPRIV0		Anticipated Litigation re:	WP &	settlement positions with
82	0720	Deliberative;Work Product	Community Preference	DPP	HUD on CPP
					CHART RE: PROGRESS ON
					VARIOUS STRATEGIC
					PRESERVATION
					INITIATIVES, REFLECTS
					INTERNAL WORKING
			Internal Charts or		PROCESS; DO NOT
	NYCPRIV0		Maps;Notes re: Anti-		PRODUCE UNDER
83	0724	Deliberative	displacement strategies	DPP	RODRIGUEZ
	NYCPRIV0				
84	0731	Deliberative	Draft presentation re:	DPP	SAME AS 52

				Draft report re: Litigation - Anticipated Litigation re:		Settlement analysis for
				Community		considering options for
		NYCPRIV0		Preference;Litigation -		CPP changes in
85		0145	Work Product	Winfield Litigation	WP	connection with litigation
86		NYCPRIVO 0146	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP &	analysis prepared to inform litigation strategy and settlement
87		NYCPRIVO 0742	Deliberative;Work Product(withdrawn)	Draft report re: Litigation - Anticipated Litigation re: Community Preference	DPP	Work product withdrawn; draft report re: MIH policy reflecting input from various individuals; precedes counsel vote on MIH; DO NOT PRODUCE UNDER RODRIGUEZ
- 07		07 12	i readet(witharawii)	Community Frenchice	D 11	draft marketing
		NYCPRIVO		Draft Document re:		guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER
88		0752	Deliberative	Marketing guidelines	DPP	RODRIGUEZ
				Internal Charts or Maps re:		
		NYCPRIV0		Litigation - Winfield	WP &	analysis to inform legal
89		0150	Deliberative;Work Product	Litigation	DPP	strategy and settlement
90		NYCPRIVO 0994	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
90		0994	Deliberative	Marketing guidennes	DPP	draft marketing
		NYCPRIVO		Draft Document re:		guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER
91	NYC_0076061	0997	Deliberative	Marketing guidelines	DPP	RODRIGUEZ
		NYCPRIVO		Draft Document re:		communications re: sections of 2016 Marketing Guidelines and attorney advice re:
92		0999	Attorney Client; Deliberative	Marketing guidelines	AC	certain sections
93		NYCPRIVO 1000	Attorney Client;Deliberative	Email chain re: Application of Community Preference	AC	communications with counsel and others re: inclusion of prior residents in community preference for various projects
93		1000	Accorney Chem, Deliberative	or community Preference	AC	projects

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94	NYCPRIVO 1003 NYCPRIVO 2149	Attorney Client Attorney Client; Deliberative	Email chain re: MIH - Anti- displacement strategies;MIH -	AC NP	communications with counsel re: requests to include prior residents in community preference, pre-policy discussion re: policy
93	2143	According chemi, beliberative	сопшини оррозиюн	. 41	r cr city s Agreement
96	NYCPRIVO 1431	Attorney Client;Legislative	Email chain re: City Council Input;Application of Community Preference	AC	communications discussing advice of counsel re: community preference with regard to specific project
97	NYCPRIVO 2174	Attorney Client;Deliberative;Legislative	Draft report re: MIH - Anti- displacement strategies;MIH - Community opposition;MIH - City council input;Community Opposition Strategies	AC	draft internal report concerning MIH and 421- a sent to counsel for legal comment
98	NYCPRIVO 1438	Legislative	Email chain re: Application of Community Preference	NP	communications about AMI and CPP as to specific development
99	NYCPRIVO 1439	Legislative	Email chain re: Application of Community Preference	NP	communications about AMI and CPP as to specific development
100	NYCPRIVO 1441	Attorney Client;Deliberative	Draft Document re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
101	NYCPRIVO 2175	Deliberative	Email chain re: Application of Community Preference	NP	communications regarding CPP
102	NYCPRIVO 1442	Legislative	Email chain re: Application of Community Preference	NP	communications about Bronx Commons development
103	NYCPRIVO 0180	Deliberative	Internal Memorandum re: 421-a - Homeless Preference	DPP	draft decision memo to mayor re: homeless unit commitment; DO NOT PRODUCE UNDER RODRIGUEZ
104	NYCPRIVO 0189	Deliberative;Work Product	Email chain re: Antidisplacement strategies; Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communications concerning information needed to evaluate changes to CPP and settlement position with HUD

	NYCPRIV0		Draft report re: MIH -		
105	0191	Deliberative	mobility	DPP	SAME AS 87
103	0131	Deliberative	mobility	DIT	SAUVIL 713 07
			Email chain re: Litigation -		
	NYCPRIVO		Anticipated Litigation re:		
106	1510	Deliberative;Work Product	Community Preference	NP	Per City's Agreement
		·	,		, ,
	NYCPRIV0		Draft talking points re: Anti-		
107	1511	Deliberative	displacement strategies	NP	Per City's Agreement
			-		
			Email chain re: Anti-		
			displacement		
	NYCPRIVO		strategies;Application of		
108	1540	Deliberative	Community Preference	NP	Per City's Agreement
					Draft decision memo on
			Internal Memorandum re:		MIH and stating
	NYCPRIV0		Commitment to Fair		understanding of legal
109	1549	Attorney Client; Deliberative	Housing	AC	advice
			Draft Internal		
			Draft Internal		
			Memorandum re: MIH - Anti-displacement		draft decision memo to
		Attornov	· ·		
	NYCPRIVO	Attorney Client;Deliberative;Work	strategies; Litigation - Anticipated Litigation re:		mayor on creation of MIH program containing and
110	1556	Product	Community Preference	AC	seeking legal advice
110	1550	Product	Community Preference	AC	Seeking legal advice
					communication regarding
	NYCPRIVO		Email chain re: Application		inquiry about application
111	1578	Deliberative;Legislative	of Community Preference	NP	of CPP
					communication regarding
	NYCPRIVO		Email chain re: Application		inquiry about application
112	1584	Deliberative;Legislative	of Community Preference	NP	of CPP
					communication with
			Email chain re: ENY - Anti-		counsel re: legal advice
			displacement		on language in draft
	NYCPRIV0		strategies;Application of		document concerning
113	1591	Attorney Client; Deliberative	Community Preference	AC	CPP
			enothelist a expression		communication with
			Email chain re: ENY - Anti-		counsel re: legal advice
	NIVCDDIVO		displacement		on language in draft
444	NYCPRIVO 1592	Attornou Client Deliberation	strategies; Application of	۸۲	document concerning CPP
114	1337	Attorney Client; Deliberative	Community Preference	AC	CFF
					draft decision memo to
			Draft Internal		mayor re: legal services
	NYCPRIVO		Memorandum re: Anti-		RFP; DO NOT PRODUCE
115	0206	Deliberative	displacement strategies	DPP	UNDER RODRIGUEZ
			,		
			Draft presentation re: MIH		
			- Anti-displacement		
			strategies;MIH -		internal draft of
			Community		considerations for MIH
	NYCPRIV0		opposition;MIH - City		policy; DO NOT PRODUCE
116	1617	Deliberative	council input	DPP	UNDER RODRIGUEZ

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117		NYCPRIVO 1620	Deliberative	Draft presentation re: MIH - Anti-displacement strategies;MIH - Community opposition;MIH - City council input	DPP	internal draft of considerations for MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ
118	NYC_0073100		Deliberative;Work Product	Email chain re: Litigation - Winfield Litigation	WP	Communications regarding this litigation and statement about it to provide to HUD
119		NYCPRIVO 0220	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	Per City's Agreement
120		NYCPRIVO 1659	Attorney Client;Deliberative	Draft talking points re: 421-a - Homeless Preference	AC	internal draft talking points in advance of meeting with REBNY containing attorney input and strategy
121		NYCPRIVO 1661	Deliberative	Email chain re: ENY - Anti- displacement strategies;Community Opposition Strategies	DPP	internal communications re: non-final talking points about non-final commitments in advance of release of Inwood Development Plan; DO NOT RELEASE UNDER RODRIGUEZ
122		NYCPRIVO 1662	Attorney Client	Email chain re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
123		NYCPRIVO 1663	Attorney Client	Email chain re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
124		NYCPRIVO 1666	Work Product	Email chain re: Litigation - Winfield Litigation	NP	Per City's Agreement
125		NYCPRIVO 1667	Deliberative;Work Product	Email chain re: Anti- displacement strategies; Litigation - Winfield Litigation	NP	Per City's Agreement communication with
126		NYCPRIVO 1723	Attorney Client;Deliberative	Email chain re: Application of Community Preference	AC	counsel and others seeking legal advice on homeless referrals to a specific project
127		NYCPRIVO 1026	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	Discussion about how to conduct data analysis to answer HUD request

					email seeking legal
					advice, among other
	NYCPRIVO		Email chain re: Application		input, on a specific
128	1726	Attorney Client; Deliberative	of Community Preference	NP	application of CPP
			, , , , , , , , , , , , , , , , , , , ,		
			Internal Charts or Maps re:		
			Litigation - Anticipated		
	NYCPRIV0		Litigation re: Community	WP &	analysis to inform
129	1034	Deliberative;Work Product	Preference	DPP	litigation strategy
			_ ,, , , , , , , , , , , , , , , , , ,		
			Email chain re: 421-a -		
	NYCPRIVO		Homeless Preference; Application of		
130	0237	Attorney Client; Deliberative	Community Preference	NP	Per City's Agreement
130	0237	Attorney chem, benberative	Community Freierence	INF	rei city s Agreement
					summary of info
					discussed at settlement
			Email chain re: Litigation -		meeting with HUD re:
	NYCPRIV0		Anticipated Litigation re:	WP &	HUD data requests for
131	1037	Deliberative;Work Product	Community Preference	DPP	alternative to CPP
					internal communications
					re: East New York
					development and strategy; DO NOT
	NYCPRIV0		Email chain re: ENY - Anti-		PRODUCE UNDER
132	1737	Deliberative;Legislative	displacement strategies	DPP	RODRIGUEZ
132	2707	2 0.110 0.10 0.110 0.100	aispiacement strategies		information and data
			Email chain re: Litigation -		collected to inform
	NYCPRIV0	Deliberative	Anticipated Litigation re:		settlement strategy with
133	1039	(withdrawn);Work Product	Community Preference	WP	HUD
			Draft report re: Anti-		
			displacement strategies;		Draft PPT re: alternatives
404	NYCPRIVO		Litigation - Winfield		to CPP to inform strategy
134	1058	Deliberative;Work Product	Litigation	WP	in litigation
					email re: gentrification
			Internal Charts or Maps re:		map in connection with
	NYCPRIV0		Anti-displacement		planning changes to CPP
135	1066	Deliberative;Work Product	strategies	WP	for settlement
					revisions to Marketing
	NYCPRIV0		Draft report re: Marketing		handbook sent to counsel
136	1067	Attorney Client; Deliberative	guidelines	AC	for comment
			Internal Charts or Maps re:		
	NIVCDDIVO		Anti-displacement	WP &	gentrification map for
137	NYCPRIVO 1070	Deliberative;Work Product	strategies; Litigation - Winfield Litigation	WP &	planning changes to CPP for settlement
137	10/0	Deliberative, Work Froudtt	Internal Charts or Maps re:	DF F	ioi settiement
			Anti-displacement		gentrification map for
	NYCPRIV0		strategies; Litigation -	WP &	planning changes to CPP
138	1071	Deliberative;Work Product	Winfield Litigation	DPP	for settlement
			Email chain re: City Council		email chain with counsel
		Attorney	Input; Litigation -		and others re: response
	NYCPRIVO	Client;Legislative;Work	Anticipated Litigation re:		to Plaintiff's counsel and
139	1075	Product	Community Preference	AC	draft letter to HUD

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				5 6		document discussing
				Draft presentation re:		strategies for
				Litigation - Anticipated		negotiations with HUD re:
			Attorney	Litigation re: Community		community preference;
		NYCPRIV0	Client;Deliberative;Work	Preference;Neighborhood		legal advice on document
140	NYC_0076236	1117	Product	Demographics	AC	sought
				Email chain re: Litigation -		ppt re: option for
				Anticipated Litigation re:		analyzing various aspects
				Community		of CDs in connection with
		NYCPRIV0		Preference;AFFH and	WP &	changes to CPP as part of
141		1122	Attorney Client;Work Product	Community Preference	DPP	litigation
						communications
						identifying portions of
						draft document where
						legal advice is sought and
		NYCPRIV0		Email chain;Draft		discussing legal review of
142		2150	Attorney Client	Document re: OTHER	AC	same
						internal communications
						re: East New York
						development and MIH
						strategy; DO NOT
		NYCPRIV0		Email chain re: Anti-		PRODUCE UNDER
143		1222	Deliberative;Legislative	displacement strategies	DPP	RODRIGUEZ
				Email chain re: Anti-		
				displacement		
		NYCPRIV0		strategies;Application of		email re: application of
144		1231	Deliberative	Community Preference	NP	СРР
						communications
						concerning preliminary
						responses to community
						questions about
						Community Housing Plan -
		NYCPRIV0		Email chain re: Community		PRODUCE UNDER
145		1292	Deliberative	Opposition Strategies	DPP	RODRIGUEZ
						internal notes reflecting
						Meltzer's thoughts on
						contract with
						NEIGHBORHOOD
						PRESERVATION
						CONSULTANT program
				Notes re: Anti-		and displacement
				displacement		mitigation strategies -
		NYCPRIV0		strategies;Commitment to		PRODUCE UNDER
146		1294	Deliberative	Fair Housing	DPP	RODRIGUEZ
				Draft report re: ENY - Anti-		
	1	1	I	displacement		
		NYCPRIV0		strategies;ENY -		

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						concept paper in advance
						of RFP for Neighborhood
						Preservation Consultant
						contract to assist HPD in
						preserving affordable
						housing stock; lays out
						goals, elements and
						parameters of new model
				Final report (non		for program - not final
				Final report (non-		
		ALV CDDIV (O		public);Draft Document re:		parameters of program -
4.40		NYCPRIVO	Dalihanskina	Anti-displacement	DDD	DO NOT PRODUCE
148		1302	Deliberative	strategies	DPP	UNDER RODRIGUEZ
						Concerns literature
		NIVCDDIVO		Farail abain and Litination		review on gentrification
4.40		NYCPRIV0	Marile December	Email chain re: Litigation -	NA/D	and economic diversity;
149		2151	Work Product	Winfield Litigation	WP	FOR SETTLEMENT
						Settlement analysis for
				Internal Charts or Maps re:		considering options for
		NYCPRIVO		Litigation - Winfield		CPP changes in
150		1342	Work Product	Litigation	WP	connection with litigation
130		1342	Work Floudet	Litigation	VVF	email discussion
						regarding options for
						changes to CPP in
		NYCPRIV0		Email chain ro: Litigation	WP &	connection with
151			Dalibarativa Mark Bradust	Email chain re: Litigation -	DPP	
151		1349	Deliberative;Work Product	Winfield Litigation	DPP	settlement positions
						communications setting
						forth preliminary
						thoughts about creation
						of HousingStat (a
						computer program to
						help officials and
						nonprofits prevent
						displacement and protect
						stock of affordable
		NYCPRIVO		Email chair vo. MALL Acti		housing) - DO NOT PRODUCE UNDER
453			Dolihorativa	Email chain re: MIH - Anti-	חחח	
152		1353	Deliberative	displacement strategies	DPP	RODRIGUEZ email discussion re:
		NYCPRIV0		Email chain rev Litigation	WP &	
152		1358	Dolihorativa Mark Bradust	Email chain re: Litigation -	DPP	settlement posiitons on CPP
153		1330	Deliberative;Work Product	Winfield Litigation	DPP	Communication about
		NYCPRIVO		Email chain re: Litigation -		work needed to inform
154		2153	Work Product	Winfield Litigation	WP	legal strategy
154		2133	**OIK I TOUUCL	Notes re: Anti-	V V I	пераг этгатеру
				displacement strategies;		Summary of fact research
		NYCPRIV0		Litigation - Winfield		done for litigation and
155		2154	Work Product	Litigation	WP	reflects litigation strategy
133		_131				email discussion re:
		NYCPRIV0		Email chain re: Litigation -	WP &	settlement positions on
156		1366	Deliberative;Work Product	Winfield Litigation	DPP	CPP
				2 2 000000		email discussion re:
		NYCPRIV0		Email chain re: Litigation -	WP &	settlement positions on
157		1367	Deliberative;Work Product	Winfield Litigation	DPP	CPP
101		_50,	_ cscrative, work i roudet			5

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			Email chain re: Litigation -		
			Anticipated Litigation re:		
			Community	_	email discussion re:
	NYCPRIV0		Preference;Litigation -	WP &	settlement positions on
158	1374	Deliberative;Work Product	Winfield Litigation	DPP	CPP
					communciations with
		Attorney	Email chain re: Litigation -		counsel and others re:
		Client;Deliberative;Work	Anticipated Litigation re:		legal strategy and
159	1375	Product	Community Preference	AC	defenses
					Describes work done for
	NYCPRIV0		Email chain re: Litigation -		informing litigation and
160	1377	Work Product	Winfield Litigation	WP	settlement strategy
			Draft Internal		
			Memorandum re:		
	NYCPRIV0		Litigation - Winfield	WP &	legal materials re:
161	1378	Deliberative;Work Product	Litigation	DPP	settlement positions
			Draft Internal		
			Memorandum re:		
	NYCPRIV0		Litigation - Winfield	WP &	legal materials re:
162	1384	Deliberative;Work Product	Litigation	DPP	settlement positions
					communications with
					counsel and others re:
	NYCPRIV0		Email chain re: Application		draft statement about
163	1746	Attorney Client	of Community Preference	AC	community preference
	NYCPRIV0		Draft report re: Litigation -	WP &	legal materials re:
164	1386	Deliberative;Work Product	Winfield Litigation	DPP	settlement positions
			Internal Charts or Maps re:		
	NYCPRIV0		Litigation - Winfield		legal materials re:
165	1392	Attorney Client;Work Product	Litigation	WP	settlement positions
	NYCPRIV0		Email chain re: Litigation -		legal materials re:
166	1398	Attorney Client; Work Product	Winfield Litigation	WP	settlement positions
					Describes work done for
	NYCPRIV0		Email chain re: Litigation -		informing litigation and
167	1399	Work Product	Winfield Litigation	WP	settlement strategy
					draft marketing
					guidelines to be
					submitted to legal for
					review and approval; DO
	NYCPRIV0		Draft Document re:		NOT PRODUCE UNDER
168	1752	Deliberative	Marketing guidelines	DPP	RODRIGUEZ
					communications
			Email chain re: Litigation -		concerning legislative
	NYCPRIV0		Anticipated Litigation re:		history of CPP and search
169	0245	Deliberative;Work Product	Community Preference	WP	for same
			.,		communications
					concerning potential
					changes to CPP in context
					of settlement discussion
			Email chain re: Litigation -		with HUD; DO NOT
	NYCPRIVO		Anticipated Litigation re:	WP &	PRODUCE UNDER
170	0263	Deliberative;Work Product	Community Preference	DPP	RODRIGUEZ
1/01	0203	Denociative, Work Floudel	Community Frenchenice	יים ו	NODINIOULL

			Internal Charte or Mane re-		
			Internal Charts or Maps re:		analysis to inform
	NIVCDDIIVO		Litigation - Anticipated	M/D 0	analysis to inform
474	NYCPRIVO	Bullharati a Wad Bard at	Litigation re: Community	WP &	litigation strategy and
171	0264	Deliberative;Work Product	Preference	DPP	settlement
			Email chain ray litigation		communications
	NYCPRIVO		Email chain re: Litigation - Anticipated Litigation re:		
172	0265	Dalibarativa Work Bradust	Community Preference	WP	concerning letter to HUD re: alternatives to CPP
1/2	0203	Deliberative;Work Product	Community Preference	VVP	re. aiternatives to CPP
					communicatons
					concerning development
			Email chain re: City Council		at 168th St. and response
	NYCPRIVO		Input;Application of		to counsel member
173	1760	Deliberative;Legislative	Community Preference	NP	concerns
1/3	1700	Deliberative, Legislative	Community Freierence	INF	CONCERNS
			Draft presentation re: Anti-		
	NYCPRIVO		displacement strategies;		
174	0274	Deliberative	421-a - 2015/2016 revision	DPP	Same as 52
					communication with
					counsel and others
					seeking advice on
					application of
	NYCPRIVO		Email chain re: Application		preferences at a specific
175	0278	Attorney Client	of Community Preference	AC	development
		,	,		Not attorney-client
					because sent to HUD;
					Letter from Been to HUD
			Final letter (non-public) re:		GC re: Settlement
		Attorney	Litigation - Anticipated		Proposal; DO NOT
	NYCPRIVO	Client;Deliberative;Work	Litigation re: Community		PRODUCE UNDER
176	0280	Product	Preference	DPP	RODRIGUEZ
			Internal Charts or Maps re:		
			Litigation - Anticipated		
			Litigation re: Community		analysis to inform
	NYCPRIV0		Preference;Litigation -	WP &	litigation strategy and
177	0281	Deliberative;Work Product	Winfield Litigation	DPP	settlement
					Communication with
					counsel; discussion
			Email chain re: Litigation -		anticipated litigation,
			Anticipated Litigation re:		FOIL request and
	NIVODD" IS		Community	100	potential fact
	NYCPRIVO	All and Oliver the London	, 3	AC &	development for
178	0292	Attorney Client; Work Product	winfield Litigation	WP	litigation
	NIVCDD" (C		Empil phois as As It as		emails between
470	NYCPRIVO	l a sialakina	Email chain re: Application	NID	Garodnick and Been re:
179	0293	Legislative	of Community Preference	NP	CPP
	NVCDDIVO		Email chain roy Litization		draft communication to
100	NYCPRIVO 0295	Work Product	Email chain re: Litigation -	NID	mayor about filing of this
180	0293	Work Product	Winfield Litigation	NP	suit
			Email chain re: Litigation -		
			Anticipated Litigation re:		communications about
			Community		this litigation and
	NYCPRIVO		Preference;Litigation -		providing statement to
181	0306	Work Product	Winfield Litigation	WP	HUD re: same
191	บวบข	VVOIK FIOUUCL	vviimeiu Liugauon	VVP	ITIOD TE. SAITIE

182		NYCPRIVO 0309	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
183		NYCPRIVO 0321	Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference	WP	Analysis of ACS demographic and housing estimates based on census tracts
184		NYCPRIVO 0322	Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP	Atty questions re: CPP and statistical tests
185	NYC_0072746	NYCPRIVO 0329	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP	Draft Letter from Been to HUD GC re: settlement
186		NYCPRIVO 1780	Attorney Client	Final report (non-public) re: Marketing guidelines	NP	
187		NYCPRIVO 1791	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
188		NYCPRIVO 0338	Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	Internal communication regarding analysis of litigation risk and settlement possibility with HUD
189		NYCPRIVO 0339	Deliberative	Email chain re: Litigation - Anticipated Litigation re: Community Preference	DPP	communications about potential changes to CPP and communications with CM Greenfield - PRODUCE UNDER RODGRIGUEZ
190		NYCPRIVO 0340	Attorney Client	Email chain re: Application of Community Preference;Community Opposition Strategies	AC	communication with counsel and other seeking advice re: public statement about CPP
191		NYCPRIVO 0341	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	Communications with HUD and then internal communications re: settlement discussions with HUD re: CPP
192		NYCPRIVO 0342	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communication concerning proposed communication with HUD re: alternatives to CPP

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					decision memo to Mayor
			Draft Internal		making
			Memorandum re: AFFH		recommendations and
			and Community		conveying legal advice re:
	NYCPRIVO		Preference;Community		rezoning in specific
193	0345	Attorney Client; Deliberative	Opposition Strategies	AC	neighborhood
					Decision memo to Mayor
			Internal Memorandum re:		re: rezoning in specific
	NYCPRIVO		Commitment to Fair		neighborhoods and
194	1835	Attorney Client; Deliberative	Housing	AC	containing legal advice
25.	1000	, account of one my conservative		, .0	oontaming regar aarroc
					Notes on property
			Final report (non-public)		portfolios and includes
	NYCPRIVO		re: Litigation - Winfield		Winfield litigation
195	1841	Work Broduct	_	WP	_
195	1041	Work Product	Litigation Internal Charts or Maps re:	VVF	strategy comments analysis to inform
	NIVCDDIVO		· ·	M/D G	
400	NYCPRIVO	Deliberation World	Litigation - Winfield	WP &	litigation strategy and
196	0351	Deliberative;Work Product	Litigation	DPP	settlement
			Later and Charles and Marries		
			Internal Charts or Maps re:		
			Litigation - Anticipated		
			Litigation re: Community		analysis to inform
	NYCPRIV0		Preference;Litigation -	WP &	litigation strategy and
197	0352	Deliberative;Work Product	Winfield Litigation	DPP	settlement
			Draft presentation re:		
	NYCPRIV0		Litigation - Winfield		Legal communication and
198	0353	Work Product	Litigation	WP	analysis of case
					Notes concerning
			Notes re: 421-a -		considerations for
			2015/2016 revision;		determining policy
	NYCPRIVO		2015/2016 revision; Litigation - Winfield	WP &	determining policy regarding 421a and
199	NYCPRIVO 0354	Deliberative;Work Product		WP & DPP	
199		Deliberative;Work Product	Litigation - Winfield		regarding 421a and
199		Deliberative;Work Product	Litigation - Winfield Litigation		regarding 421a and changes to law list of questions to
199	0354	Deliberative;Work Product Deliberative;Work Product	Litigation - Winfield		regarding 421a and changes to law
	0354 NYCPRIVO		Litigation - Winfield Litigation Notes re: Litigation -	DPP	regarding 421a and changes to law list of questions to consider re: possible
	0354 NYCPRIVO		Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation	DPP	regarding 421a and changes to law list of questions to consider re: possible
	0354 NYCPRIVO		Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re:	DPP	regarding 421a and changes to law list of questions to consider re: possible
	0354 NYCPRIVO		Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated	DPP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP
	0354 NYCPRIVO 0355		Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community	DPP WP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP
200	0354 NYCPRIVO 0355 NYCPRIVO	Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation -	WP WP &	regarding 421a and changes to law list of questions to consider re: possible changes to CPP
	0354 NYCPRIVO 0355		Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community	DPP WP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP
200	0354 NYCPRIVO 0355 NYCPRIVO	Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation -	WP WP &	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement
200	0354 NYCPRIVO 0355 NYCPRIVO	Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation	WP WP &	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re:
200	0354 NYCPRIVO 0355 NYCPRIVO 0356	Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation Draft Internal	WP WP &	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re: preservation initatives;
200	0354 NYCPRIVO 0355 NYCPRIVO 0356	Deliberative;Work Product Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation Draft Internal Memorandum re: Anti-	WP WP & DPP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re: preservation initatives; DO NOT PRODUCE
200	0354 NYCPRIVO 0355 NYCPRIVO 0356	Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation Draft Internal	WP WP &	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re: preservation initatives;
200	0354 NYCPRIVO 0355 NYCPRIVO 0356	Deliberative;Work Product Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation Draft Internal Memorandum re: Antidisplacement strategies	WP WP & DPP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re: preservation initatives; DO NOT PRODUCE
200	0354 NYCPRIVO 0355 NYCPRIVO 0356	Deliberative;Work Product Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation Draft Internal Memorandum re: Anti- displacement strategies Internal Charts or Maps re:	WP WP & DPP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re: preservation initatives; DO NOT PRODUCE
200	0354 NYCPRIVO 0355 NYCPRIVO 0356	Deliberative;Work Product Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation Draft Internal Memorandum re: Anti- displacement strategies Internal Charts or Maps re: Litigation - Anticipated	WP WP & DPP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re: preservation initatives; DO NOT PRODUCE UNDER RODRIGUEZ
200	NYCPRIVO 0355 NYCPRIVO 0356 NYCPRIVO 0363	Deliberative;Work Product Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation Draft Internal Memorandum re: Antidisplacement strategies Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community	WP & DPP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re: preservation initatives; DO NOT PRODUCE UNDER RODRIGUEZ analysis to inform
200	0354 NYCPRIVO 0355 NYCPRIVO 0356	Deliberative;Work Product Deliberative;Work Product	Litigation - Winfield Litigation Notes re: Litigation - Winfield Litigation Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation Draft Internal Memorandum re: Anti- displacement strategies Internal Charts or Maps re: Litigation - Anticipated	WP WP & DPP	regarding 421a and changes to law list of questions to consider re: possible changes to CPP analysis to inform litigation strategy and settlement internal draft re: preservation initatives; DO NOT PRODUCE UNDER RODRIGUEZ

204	NYCPRIVO 0368	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
205	NYCPRIVO 0378	Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies
206	NYCPRIVO 0379	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Setlement analysis for considering options for CPP changes in connection with litigation
207	NYCPRIVO 0380	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation
208	NYCPRIVO 0382	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation - MAP
209	NYCPRIVO 0391	Work Product	Draft presentation re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies
210	NYCPRIVO 0392	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP	Draft Letter from Been to HUD GC re: settlement
211	NYCPRIVO 0393	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation - MAP
212	NYCPRIVO 0394	Deliberative	Draft talking points re: 421-a - Homeless	NP	draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a
213	NYCPRIVO 0395	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a
214	NYCPRIVO 0396	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a
215	NYCPRIVO 0402	Deliberative;Legislative	Draft talking points re: MIH - Anti-displacement strategies	DPP	same as 83
216	NYCPRIVO 1843	Attorney Client; Deliberative	Internal Memorandum re: 421-a - 2015/2016 revision	AC	legal summary for client re: 421-a

	I			T	1	
217		NYCPRIVO 1850	Deliberative	Draft report re: Application of Community Preference;Marketing guidelines	DPP	draft section of marketing handbook; DO NOT PRODUCE UNDER RODRIGEZ
218		NYCPRIVO 1855	Attorney Client;Deliberative	Internal Memorandum re: 421-a - Homeless Preference	AC	Memo reflecting opinions of HPD Legal Affairs and Law Department on tenant selection and requested for determining policy re: same
219		NYCPRIVO 1863	Deliberative	Draft talking points re: Anti- displacement strategies	NP	draft Q&As re: affordable housing in connection with 2015 mayor state of city address
220	NYC_0067398		Work Product	Draft Document re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP	Draft questions for analysis for formulating litigation strategy
224	NVC 0067400		Dalibarativa Wark Braduct	Draft Internal Memorandum re: Litigation - Winfield	WP &	analysis to inform litigation strategy and
221	NYC_0067400		Deliberative; Work Product	Litigation Draft Internal	שרע	settlement
222	NYC_0067402		Deliberative;Work Product	Memorandum re: Litigation - Winfield Litigation	WP &	analysis to inform litigation strategy and settlement
				Final presentation (non- public) re: Litigation -		Legal communication and
223	NYC_0067405		Work Product	Winfield Litigation	WP	analysis of case
224	NYC_0067416		Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
225	NYC_0067418		Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference Internal Charts or Maps re:	WP & DPP	analysis to inform litigation strategy and settlement analysis to inform
226	NYC_0067422		Deliberative;Work Product	Litigation - Winfield Litigation	WP & DPP	litigation strategy and settlement
	_			Notes re: Litigation - Anticipated Litigation re:		notes reflect communications with HUD re: settlement of
227	NYC_0067424		Deliberative;Work Product	Community Preference	WP	issues raised about CPP
228	NYC 0067425		Work Product	Notes re: Litigation - Winfield Litigation	WP	Reflects attorney questions and information gathering for litigation
	NYC 0067426		Work Product	Notes re: Litigation - Winfield Litigation	WP	Reflects potential analyses for informing litigation strategy
				-		

				Draft presentation re:		Draft presentation re:
				Litigation - Winfield		litigation for informing
220	NYC_0067431		Work Product	Litigation	WP	litigation strategy
250	N1C_0067451		WORK Product	Draft talking points re:	VVP	intigation strategy
				MIH - Community		
				opposition;Anti-		Notes for discussion with
				displacement		NYT about fair housing;
				strategies;Commitment to		does not reflect
221	NYC 0067438		Deliberative	Fair Housing	NP	decisionmaking on policy
231	1416_0007438		Deliberative	Tall Housing	IVI	decisioninaking on policy
						Withdraw legislative
						privilege; adding DPP;
						communications with
						counsel and others to
						provide legal advice
						regarding proposed
						application of CPP to
		NYCPRIVO	Attorney Client;Legislative	Email chain re: Application		displaced tenants of
232		1867	(Withdrawn); Deliberative	of Community Preference	AC	Greenpoint/Wiliamsburg
232			(2. John Jamey Frederica		z. zenpenig manisbarg
		NYCPRIVO		Draft report re: Application		
233		1874	Attorney Client; Deliberative	of Community Preference	NP	Per City's Agreement
						draft of proposed new
						housing marketplace
		NYCPRIV0		Draft report re: Anti-		plan; DO NOT PRODUCE
234		1882	Deliberative	displacement strategies	DPP	UNDER RODRIGUEZ
						communications with
		ALV CDDIV (O		For the bottom Andreas		counsel discussing
235		NYCPRIVO 1884	Attorney Client	Email chain re: Application	۸۵	potential legislation and
255		1004	Attorney chefit	of Community Preference	AC	conveying legal advice draft language for
				Draft report re: Litigation -		including in AFFH
				Winfield		Consolidated Plan; DO
		NYCPRIV0		Litigation;Commitment to		NOT PRODUCE UNDER
236		2774	Deliberative	Fair Housing	DPP	RODRIGUEZ
						draft language for
				Draft report re: Litigation -		including in AFFH
				Winfield		Consolidated Plan; DO
		NYCPRIVO		Litigation;Commitment to		NOT PRODUCE UNDER
237		2775	Deliberative	Fair Housing	DPP	RODRIGUEZ
						draft of 2016
				Draft report re:		consolidated plan re:
		NYCPRIV0		Commitment to Fair	AC &	AFFH sent to counsel for
238		2782	Attorney Client; Deliberative	Housing	DPP	comments
						draft of 2016
				Draft report re:		consolidated plan re:
		NYCPRIV0		Commitment to Fair	AC &	AFFH sent to counsel for
239		2783	Attorney Client; Deliberative	Housing	DPP	comments
						d ft . f 2046
		NIVCDD II (C		Droft rone of the AFFILE	A.C. 9	draft of 2016
340		NYCPRIVO	Attornou Client Delile	Draft report re: AFFH and	AC &	consolidated plan re:
240		2784	Attorney Client; Deliberative	Community Preference Draft report re: AFFH and	DPP	AFFH sent to counsel for dominof n2016
				Community		consolidated plan re:
		NYCPRIV0		Preference;Commitment	AC &	AFFH sent to counsel for
241		2785	Attorney Client; Deliberative	to Fair Housing	DPP	comments
241		2703	According chemi, Deliberative	to rail riousing	ווט	COMMITTEE

				Draft rapart ray Anti		draft of 2016
				Draft report re: Anti-		draft of 2016
		655U (6		displacement		consolidated plan
		CPRIV0		strategies;Commitment to	AC &	sections re: AFFH sent to
242	279	97	Attorney Client; Deliberative	Fair Housing	DPP	counsel for comments
						draft langauge for
				Draft report re: Anti-		including in AFFH
				displacement		Consolidated Plan; DO
		CPRIV0		strategies;Commitment to		NOT PRODUCE UNDER
243	280	00	Deliberative	Fair Housing	DPP	RODRIGUEZ
						draft language for Fair
				_		Housing Statement to be
				Draft report re:		included in AFFH Plan;
		CPRIV0		Commitment to Fair		DO NOT PRODUCE
244	280	07	Deliberative	Housing	DPP	UNDER RODRIGUEZ
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments from multiple
	NYC	CPRIV0		Commitment to Fair	AC &	agencies to submit to
245	281	12	Attorney Client; Deliberative	Housing	DPP	legal
		7				draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
	NYO	CPRIV0		Commitment to Fair		NOT PRODUCE UNDER
246	282	25	Deliberative	Housing	DPP	RODRIGUEZ
						email re: language for
						inclusion in AFFH
				Email chain re:		document RE: 5-yr needs
	NYO	CPRIV0		Commitment to Fair		for HPD Fair Housing
247	282	28	Deliberative	Housing	NP	Program
				Draft report re: Anti-		
				displacement		draft of 2010 AFFH
	NYO	CPRIV0		strategies;Commitment to	AC &	statement for HUD sent
248	283	32	Attorney Client; Deliberative	Fair Housing	DPP	to counsel for comments
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
	NYO	CPRIV0		Commitment to Fair		NOT PRODUCE UNDER
249	285		Deliberative	Housing	DPP	RODRIGUEZ
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
	NYO	CPRIV0		Commitment to Fair	AC &	agencies to submit to
250	288		Attorney Client; Deliberative	Housing	DPP	legal
230	200			Draft report re: Anti-		draft of 2012
				displacement		consolidated plan re:
	NV	CPRIV0		strategies;Commitment to	AC &	AFFH sent to counsel for
251	289		Attorney Client; Deliberative	Fair Housing	DPP	comments
231	209	,,	Actorney cheric, Deliberative	I all Housing	DFF	draft language for
						including in AFFH
						_
	NIV.	CDDIV		Draft ranget va. A = +:		Consolidated Plan; DO
353		CPRIVO	Deliharativo	Draft report re: Anti-	DDD	NOT PRODUCE UNDER
252	289	19	Deliberative	displacement strategies	DPP	RODRIGUEZ

				Final report (non-public)		
				re: Litigation - Anticipated		
				Litigation re: Community		
		NYCPRIVO		Preference;Commitment		Excerp AFFH update from
253	2	1905	Attorney Client; Work Product	to Fair Housing	NP	2011 consolidated plan
				Final report (non-public)		
				re: Litigation - Winfield		
	N	NYCPRIVO		_		2011 consolidated plan
254		1906	Attorney Client;Work Product	Litigation; Commitment to	NP	re: AFFH to HUD
254	2	.900	According Chemi, Work Product	raii riousing	INF	Te. AFFIT to HOD
				Final report (non-public)		
				re: Litigation - Anticipated		
				Litigation re: Community		
	l _N	NYCPRIVO		Preference;Commitment		
255		2911	Attorney Client; Work Product		NP	Per City's Agreement
			.,,	Draft report re:		draft of 2013
				Neighborhood		consolidated plan re:
	l _N	NYCPRIVO		Demographics;Commitme	AC &	AFFH sent to counsel for
256		2913	Attorney Client; Deliberative	nt to Fair Housing	DPP	comments
230	_	.515	recorney enemaliative	inc to run riousing	D 11	comments
						draft sections for 2013
				Draft report re:		Consolidated Plan AFFH;
	N	NYCPRIVO		Commitment to Fair		DO NOT PRODUCE
257		2924	Deliberative	Housing	DPP	UNDER RODRIGUEZ
207	_	.52	20.00.00.00	110 401116		draft langauge for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
	N	NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
258		2939	Deliberative	Housing	DPP	RODRIGUEZ
		.500	20.00.00.00			
				Email chain re: Litigation -		
				Anticipated Litigation re:		
				Community		
				Preference;Litigation -		
				Other;AFFH and		Communication with
			Attorney	Community		attorney re: draft
	N	NYCPRIVO	Client;Deliberative;Work	Preference;Commitment		submission to HUD and
259	2	2943	Product	to Fair Housing	AC	legal issues re: same
				Final report (non-public)		2007 Final Consolidated
				re: Litigation - Anticipated		Plan AFFH Annual
	N	NYCPRIVO		Litigation re: Community		Performance Report to
260	2	953	Attorney Client;Work Product	Preference;((Litigation))	NP	HUD
				Final report (non-public)		
				re: Litigation - Anticipated		
			Attorney	Litigation re: Community		
	N	NYCPRIVO	Client;Deliberative;Work	Preference;Commitment		Excerp AFFH update from
261	2	2954	Product	to Fair Housing	NP	2008 consolidated plan
						draft language for
				Draft report re:		including in AFFH
				Neighborhood		Consolidated Plan; DO
	N	NYCPRIVO		Demographics;Commitme		NOT PRODUCE UNDER
262	2	2967	Deliberative	nt to Fair Housing	DPP	RODRIGUEZ
		H				

						1 6 1
						draft submission to HUD
				_		re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
263		2968	Attorney Client; Deliberative	Housing	DPP	legal
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
264		2969	Attorney Client; Deliberative	Housing	DPP	legal
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
265		2970	Attorney Client; Deliberative	Housing	DPP	legal
				Draft report re:		
				Neighborhood		draft of portion of AFFH-
		NYCPRIV0		Demographics;Commitme	AC &	related document sent to
266		2973	Attorney Client; Deliberative	nt to Fair Housing	DPP	counsel for comments
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
267	NYC 0085477	3002	Deliberative	Housing	DPP	RODRIGUEZ
	_			3		draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIV0		Commitment to Fair		NOT PRODUCE UNDER
268	NYC 0085478	3003	Deliberative	Housing	DPP	RODRIGUEZ
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIV0		Commitment to Fair		NOT PRODUCE UNDER
270		3015	Deliberative	Housing	DPP	RODRIGUEZ
270		3013	Democrative	The daming		draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
271		3016	Deliberative	Housing	DPP	RODRIGUEZ
2/1		3010	Denberative	Thousing .	5.1	draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIV0		Commitment to Fair		NOT PRODUCE UNDER
272		3025	Deliberative	Housing	DPP	RODRIGUEZ
212		3023	Democrative	riousing	D1 F	draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
272		3055	Attorney Client-Deliberative		DPP	J
273		3033	Attorney Client; Deliberative	Housing	DFF	legal
				Email chain re: Litigation -		
				Anticipated Litigation re:		
				Community		
				Preference; Litigation -		Communication
			Attornov	Other;AFFH and		Communication with
		NIVCDD II (C	Attorney	Community	46.0	attorney re: draft
27.		NYCPRIVO	Client;Deliberative;Work	Preference;Commitment	AC &	submission to HUD and
274	ļ	3070	Product	to Fair Housing	WP	legal issues re: same

				Email chain re: Litigation -		
				Anticipated Litigation re:		
				Community		
				Preference;Litigation -		
				Other;AFFH and		Communication with
			Attorney	Community		attorney re: draft
		NYCPRIV0	Client;Deliberative;Work	Preference;Commitment	AC &	submission to HUD and
275		3093	Product	to Fair Housing	WP	legal issues re: same
2/3		3033	rioduct	to rail riousing	VVI	draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NIVCDDIVO		'		*
276		NYCPRIVO	Dallhamil a	Commitment to Fair	555	NOT PRODUCE UNDER
276		3122	Deliberative	Housing	DPP	RODRIGUEZ
						email re: language for
						inclusion in AFFH
						document RE: 5-year
						nees for HPD Fair
						Housing Program; DO
				Email chain re:		NOT PRODUCE
		NYCPRIV0		Commitment to Fair		PURSUANT TO
277		3124	Deliberative	Housing	DPP	RODRIGUEZ
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
278		3126	Deliberative	Housing	DPP	RODRIGUEZ
				3		draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIVO		Commitment to Fair	WP &	agencies to submit to
279		3131	Attorney Client; Deliberative	Housing	DPP	legal
213		3131	Attorney Cheric, Deliberative	Housing	DII	draft language for
				Draft report re:		including in AFFH
				Neighborhood		Consolidated Plan; DO
		NIVCDDIVO		Demographics;Commitme		NOT PRODUCE UNDER
200		NYCPRIVO	Dalihanskina		DDD	
280		3149	Deliberative	nt to Fair Housing	DPP	RODRIGUEZ
				Draft report re: Litigation -		
				Anticipated Litigation re:		Internal communication
				Community		concerning resonse to
		NYCPRIV0		Preference;Application of		plaintiff's counsel's leter
281	NYC_0085800	3157	Work Product	Community Preference	WP	re: AFFH
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments do multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
282		3182	Attorney Client; Deliberative	Housing	DPP	legal
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIV0		Commitment to Fair		NOT PRODUCE UNDER
283		3185	Deliberative	Housing	DPP	RODRIGUEZ
203				0		draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
204			Attornov Cliont Dolihorativa		DPP	
284		3202	Attorney Client; Deliberative	Housing	אאט	legal

						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIV0		Commitment to Fair		NOT PRODUCE UNDER
285		3212	Deliberative	Housing	DPP	RODRIGUEZ
						draft language for
				Draft report re:		including in AFFH
				Neighborhood		Consolidated Plan; DO
		NYCPRIV0		Demographics;Commitme		NOT PRODUCE UNDER
286		3226	Deliberative	nt to Fair Housing	DPP	RODRIGUEZ
				Draft report re:		Draft of information for
				Neighborhood		2012 consolidated plan
		NYCPRIVO		Demographics;Commitme		submitted to attorneys
287	NYC 0085811	3235	Attorney Client; Deliberative	nt to Fair Housing	AC	for advice
			, , , , , , , , , , , , , , , , , , , ,			
				Email chain re: Litigation -		
				Anticipated Litigation re:		
				Community		
				Preference;Litigation -		
				Other;AFFH and		Communication with
			Attorney	Community		attorney re: draft
		NYCPRIVO	Client;Deliberative;Work	Preference;Commitment	AC &	submission to HUD and
200	NYC 0085819	3237	Product		WP	
288	N1C_0082819	3237	Product	to Fair Housing	WP	legal issues re: same draft submission to HUD
				Dorett was a state of		re AFFH seeking
		****		Draft report re:		comments of multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
289		3240	Attorney Client; Deliberative	Housing	DPP	legal
						draft of strategic plan for
						2015-2019 and potential
				Draft letter re: Anti-		actions for Consolidated
				displacement		Plan years; DO NOT
		NYCPRIV0		strategies;Commitment to		PRODUCE UNDER
290		3250	Deliberative	Fair Housing	DPP	RODRIGUEZ
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
291		3264	Attorney Client; Deliberative	Housing	DPP	legal
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments do multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
292		3265	Attorney Client; Deliberative	Housing	DPP	legal
						AC withdrawn; draft of
				Draft report re: Anti-		housing plan; final
				displacement		publicly available; DO
		NYCPRIV0	Attorney Client	strategies;Commitment to		NOT PRODUCE UNDER
293		3277	(withdrawn);Deliberative	Fair Housing	DPP	RODRIGUEZ
233		J_,,	(arawij) Deliberative	. a riodonig		
						working draft for
				Draft report re: Anti-		anticipated 10-year
				displacement		affordable housing plan;
		NYCPRIV0		strategies;Commitment to		DO NOT PRODUCE
204			Dolihorativo	-	DBB	
294		3280	Deliberative	Fair Housing	DPP	UNDER RODRIGUEZ

				Draft talking points re: Anti-		draft of Q&As re: not yet
				displacement		final housing plan sent to
		NYCPRIVO		· ·	AC &	counsel for review and
295		3283	Attorney Client; Deliberative	Fair Housing	DPP	comment
				0		
						draft outline concerning
						MIH policy considerations
						and action items; DO
		NYCPRIV0		Draft report re: MIH -		NOT PRODUCE UNDER
296		3284	Deliberative	mobility	DPP	RODRIGUEZ
				Draft talking points re: Anti-		
				displacement		draft Q&A re: 10-year
		NYCPRIV0		strategies;Commitment to		housing plan under
297		3294	Deliberative	Fair Housing	NP	deBlasio and MIH
						communication with
						counsel and others
		NYCPRIV0			AC &	seeking comments on
298		1896	Attorney Client; Deliberative	mobility	DPP	draft document re: MIH
				Final range to the second to the		Chrotomy elide are Fred And
		ALV CDDIV (O		Final report (non-public)		Strategy slide re: East NY
200	NIV.C 0000435	NYCPRIVO	Dalihanskina	re: Anti-displacement	NID	Community Plan and
299	NYC_0080435	3314	Deliberative	strategies	NP	Housing NY
				Draft Internal		draft decision memo to
				Memorandum re: MIH -		mayor re: creation of MIH
				Anti-displacement		program and
		NYCPRIVO			AC &	seeking/reflecting legal
300		3319	Attorney Client; Deliberative	Community Preference	DPP	advice
300		3313	Attorney chem, Deliberative	Community Frenchice	DII	duvice
						communications re:
						communications re:
						policy considerations for
		NYCPRIVO		Email chain re: 421-a -		
301		NYCPRIVO 3337	Deliberative		DPP	policy considerations for anticipated MIH policy;
301			Deliberative	Email chain re: 421-a - 2015/2016 revision Email chain re:	DPP	policy considerations for anticipated MIH policy; DO NOT PRODUCE
301			Deliberative	2015/2016 revision	DPP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ
301		3337	Deliberative Deliberative	2015/2016 revision Email chain re:	DPP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning
		3337 NYCPRIVO		2015/2016 revision Email chain re: Neighborhood Demographics Draft report re:		policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23
		3337 NYCPRIVO		2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood		policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23
		3337 NYCPRIVO 3347		2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics		policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23
302		NYCPRIVO 3347 NYCPRIVO	Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal	NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat
302		3337 NYCPRIVO 3347 NYCPRIVO 3348	Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North	NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re:
302		NYCPRIVO 3347 NYCPRIVO 3348	Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various
302		3337 NYCPRIVO 3347 NYCPRIVO 3348	Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and	NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re:
302		NYCPRIVO 3347 NYCPRIVO 3348	Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods
302		NYCPRIVO 3347 NYCPRIVO 3348	Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re:	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods
302		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359	Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city
302		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO	Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies; ENY -	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY
302		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359	Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH
302		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO	Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH draft of possible
302		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO	Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition Draft report re: MIH - Anti-	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH draft of possible modifications to MIH
302		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO 3369	Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition Draft report re: MIH - Anti-displacement	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH draft of possible modifications to MIH plan submitted to
302 303 304 305		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO 3369	Deliberative Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition Draft report re: MIH - Anti-displacement strategies;Application of	NP NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH draft of possible modifications to MIH plan submitted to counsel for advice and
302		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO 3369	Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition Draft report re: MIH - Anti- displacement strategies;Application of Community Preference	NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH draft of possible modifications to MIH plan submitted to
302 303 304 305		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO 3369	Deliberative Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition Draft report re: MIH - Anti- displacement strategies;Application of Community Preference Draft letter re: MIH - Anti-	NP NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH draft of possible modifications to MIH plan submitted to counsel for advice and
302 303 304 305		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO 3369 NYCPRIVO 3370	Deliberative Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition Draft report re: MIH - Anti- displacement strategies;Application of Community Preference Draft letter re: MIH - Anti- displacement	NP NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH draft of possible modifications to MIH plan submitted to counsel for advice and
302 303 304 305		NYCPRIVO 3347 NYCPRIVO 3348 NYCPRIVO 3359 NYCPRIVO 3369	Deliberative Deliberative Deliberative Deliberative	2015/2016 revision Email chain re: Neighborhood Demographics Draft report re: Neighborhood Demographics Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition Draft report re: MIH - Anti- displacement strategies;Application of Community Preference Draft letter re: MIH - Anti-	NP NP NP	policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ emails concerning presentation for Oct. 23 retreat Per City's Agreement transition memo re: development in various neighborhoods letter from office of comptroller to city planning re: East NY Community plan and MIH draft of possible modifications to MIH plan submitted to counsel for advice and

				Dueft latter or FANA A C		internal destructions
				Draft letter re: ENY - Anti-		internal draft letter in
				displacement		response to comptroller
				strategies;ENY -		concerns re: East NY
				Community		Community plan and
		NIVCDDIVO		opposition;ENY - Investment in		MIH; produce final; draft DO NOT PRODUCE
200		NYCPRIVO 3374	Deliberative	Communities	DPP	UNDER RODRIGUEZ
308		3374	Deliberative	Final letter (non-public) re:	אפט	UNDER RODRIGUEZ
		NYCPRIV0		Community Opposition		letter from City Counsel
309		3390	Deliberative	Strategies	NP	re: rezoning in Bushwick
309		3390	Deliberative	Strategies	INF	re. rezoning in bushwick
				Draft talking points re: ENY		
				- Anti-displacement		
				strategies;ENY -		
				Investment in		
		NYCPRIVO		Communities; Application		
310		3396	Deliberative	of Community Preference	NP	
				Draft talking points re:		presentation to mayor in
		NYCPRIV0		MIH - Anti-displacement		advance for a town hall
311		3406	Deliberative	strategies	NP	meeting
				Final talking points (non-		
				public) re: MIH - Anti-		
				displacement		
		NYCPRIV0		strategies;421-a -		Q&As for meeting on
312		3407	Deliberative	Homeless Preference	NP	senior housing
						draft of East NY
				Draft report re: ENY - Anti-		affordable housing plan
		NIVCDD!! (C		displacement		seeking public input to
313		NYCPRIVO 3410	Deliberative	strategies;ENY -	NP	refine plan for public review
213		J4±U	Deliberative	Community opposition		draft memo including
						recommendations for
						land use, zoning, and
						other matters in
						connection with
						affordable housing in East
				Draft report re:		New York; DO NOT
		NYCPRIV0		Neighborhood		PRODUCE UNDER
314		3413	Deliberative	Demographics	DPP	RODRIGUEZ
				Draft report re:		
		NYCPRIV0		Neighborhood		
315		3415	Deliberative	Demographics	DPP	SAME AS 314
						highlighted internal
						summary of possible
						changes to policies
						affecting affordable
		NVCDDIVC		Droft ropert ro. Anti		housing in Crown Heights
216	IVC 0001CE0	NYCPRIVO	Dolihorativo	Draft report re: Anti-	DPP	West; DO NOT PRODUCE
310 N	IYC_0081650	3416	Deliberative	displacement strategies Draft report re:	שאט	UNDER RODRIGUEZ
		NYCPRIVO		Neighborhood		
317		3417	Deliberative	Demographics	DPP	SAME AS 314
31/		J+1/	Deliberative	Draft report re:	Dr F	DAIVIL AD 314
		NYCPRIV0		Neighborhood		
318		3418	Deliberative	Demographics	DPP	SAME AS 314
310		3410	Deliberative	Demographics	אוס ו	SAIVIL AS SI4

	I			Duett assess		I I
		*************		Draft report re:		
		NYCPRIV0		Neighborhood		
319		3419	Deliberative	Demographics	DPP	SAME AS 314
				Draft report re:		
		NYCPRIV0		Neighborhood		
320		3420	Deliberative	Demographics	DPP	SAME AS 314
						not conveying legal
		NYCPRIV0		Email chain re: Application		advice or seeking legal
321		3422	Attorney Client	of Community Preference	NP	advice
						Project briefing memo for
						Hunter's Point South
						development for
						decisionmaking
						concerning affordable
						housing strategies in
						neighborhood; DO NOT
		NYCPRIV0		Draft report re: Application		PRODUCE UNDER
222			Daliborativo		DDD	
322		3426	Deliberative	of Community Preference	DPP	RODRIGUEZ
						Withdrawing WP; draft of
						Fair Housing Assessment
						Tool outline reflecting
						internal thoughts
				Draft presentation re:		regarding how to comply
				Litigation - Anticipated		with 2015 rule change;
		NYCPRIV0	Deliberative;Work Product	Litigation re: Community		DO NOT PRODUCE
323		1910	(withdrawn)	Preference	DPP	UNDER RODRIGUEZ
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
324		3430	Deliberative	Housing	DPP	RODRIGUEZ
<u> </u>						draft language for
				Draft report re: Anti-		including in AFFH
				displacement		Consolidated Plan; DO
		NYCPRIV0		strategies;Commitment to		NOT PRODUCE UNDER
225			Dolihorativo		DPP	RODRIGUEZ
325		3436	Deliberative	Fair Housing	שרא	
						draft language for
						including in AFFH
		AUV COOR III II		Durft and the state of the		Consolidated Plan; DO
		NYCPRIVO		Draft report re: Anti-		NOT PRODUCE UNDER
326		3456	Deliberative	displacement strategies	DPP	RODRIGUEZ
				Final report (non-public)		
		NYCPRIV0		re: Anti-displacement		report on public housing
327		1911	Deliberative	strategies	NP	needs
				Draft report re: Litigation -		
				Anticipated Litigation re:		
				Community		
				•		
		NYCPRIVO		Preference:Application of		
328		NYCPRIVO 3478	Work Product	Preference; Application of Community Preference	NP	Per City's Agreement

		1				
				Draft report re: Anti-		draft language for
				displacement		including in AFFH
				strategies;Neighborhood		Consolidated Plan; DO
		CPRIV0		Demographics;Commitme		NOT PRODUCE UNDER
329	348	81	Deliberative	nt to Fair Housing	DPP	RODRIGUEZ
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
	NY	CPRIV0		Commitment to Fair		NOT PRODUCE UNDER
330	348	87	Deliberative	Housing	DPP	RODRIGUEZ
						draft language for
				Draft report re: Anti-		including in AFFH
				displacement		Consolidated Plan; DO
	NY	CPRIVO		strategies;Commitment to		NOT PRODUCE UNDER
331	349	.99	Deliberative	Fair Housing	DPP	RODRIGUEZ
				-		draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
	NY	CPRIVO		Commitment to Fair		NOT PRODUCE UNDER
332	359	90	Deliberative	Housing	DPP	RODRIGUEZ
				Internal Memorandum re:		
	NY	CPRIVO		AFFH and Community		
333	360	-	Deliberative	Preference	NP	
333			2020.00.10	T C C C C C C C C C C C C C C C C C C C		draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
	NV	CPRIVO		Commitment to Fair		NOT PRODUCE UNDER
334	363		Deliberative	Housing	DPP	RODRIGUEZ
334	30.	134	Deliberative	Tiousing	DFF	draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
	NV	CPRIVO		Commitment to Fair		NOT PRODUCE UNDER
335	370		Deliberative		DPP	RODRIGUEZ
333	3/0	05	Deliberative	Housing	DPP	draft language for
				Draft ranget ray Anti		
				Draft report re: Anti-		including in AFFH
	NIX	CPRIVO		displacement		Consolidated Plan; DO NOT PRODUCE UNDER
226			Dolihorativa	strategies;Commitment to	DDD	
336	373	10	Deliberative	Fair Housing	DPP	RODRIGUEZ
						draft language for
						including in AFFH
		(CDD!) (C				Consolidated Plan; DO
		CPRIVO	Dalth and a	Dorft over de	555	NOT PRODUCE UNDER
337	376	61	Deliberative	Draft report re:	DPP	RODRIGUEZ
						draft language for
				- 6		including in AFFH
				Draft report re:		Consolidated Plan; DO
		CPRIV0		Commitment to Fair		NOT PRODUCE UNDER
338	376	66	Deliberative	Housing	DPP	RODRIGUEZ
						draft language for
				Draft report re:		including in AFFH
				Neighborhood		Consolidated Plan; DO
		CPRIVO		Demographics;Commitme		NOT PRODUCE UNDER
339	390	04	Deliberative	nt to Fair Housing	DPP	RODRIGUEZ

			Due for a second use Addition Australia		Draft portion of 10-year
			Draft report re: MIH - Anti-		housing plan; produce final 10-YEAR PLAN; DO
	NYCPRIVO		displacement strategies;MIH -		NOT PRODUCE UNDER
340	2191	Deliberative	Community opposition	DPP	RODRIGUEZ
340	2131	Deliberative	Internal Memorandum re:	DIT	NODNIGOLZ
	NYCPRIVO		Litigation - Winfield		
341	2395	Deliberative	Litigation	NP	Per City's Agreement
			3		not conveying legal
	NYCPRIVO		Email chain re: Application		advice or seeking legal
342	2396	Attorney Client	of Community Preference	NP	advice
			Draft talking points re:		
			MIH - Anti-displacement		
	NYCPRIV0		strategies;MIH -		draft Q&A on Housing NY
343	2193	Deliberative	Community opposition	NP	and MIH
			Internal Memorandum re:		questions for agencies for
	NIV(CDDII) (C		Anti-displacement		purposes of HPD
244	NYCPRIVO	Dallie and a	strategies;Community	NID	affordable housing
344	2200	Deliberative	Opposition Strategies	NP	planning
			Draft Document re: ENY -		
			Anti-displacement		
			strategies;ENY - City		
	NYCPRIVO		council input;Application		
345	1952	Legislative	of Community Preference	NP	Per City's Agreement
			,		draft decision memo to
					mayor re: creation of MIH
			Internal Memorandum re:		program and
	NYCPRIV0		Application of Community	AC &	seeking/reflecting legal
346	1971	Attorney Client; Deliberative	Preference	DPP	advice
					document provided by
	NIV CDDII (O		Durfi telling seriale as Aut		CM Brad Landers about
2.47	NYCPRIVO	Dalibarativa I agislativa	Draft talking points re: Anti-		possible bill protecting
347	2261	Deliberative;Legislative	displacement strategies	NP	tenants from harassment
					decision memo to mayor
					to guide decision re:
			Draft Internal		Bedford Armory Project;
	NYCPRIV0		Memorandum re: Anti-		DO NOT PRODUCE
348	2283	Deliberative;Legislative	displacement strategies	DPP	UNDER RODRIGUEZ
		-			
					Withdrawing legislative
					privilege;
					communications with
					counsel and others
					concerning response to
					request from CM
					regarding certain AMI
	NYCPRIVO		Email chain re: MIH -		units under MIH policy;
349	2301	Attorney Client;Legislative	Community opposition	AC	reflects legal advice

			T		1
			Draft Document re: ENY -		
			Anti-displacement		draft outline of issues to
	NYCPRIVO		strategies;Application of		inform decisions re: East
350	2037	Deliberative;Legislative	Community Preference	NP	New York development
			Email chain re: Anti-		
				DPP &	
	NYCPRIVO		' ' '	Legislat	
351	2302	Deliberative;Legislative	strategies	ive	
331	2302	Deliberative, Legislative	Strategies	100	communications re: state
					of the city address
	NYCPRIVO		Email chain re: MIH - Anti-		highlights as talking
352	2040	Deliberative	displacement strategies	NP	points to press
			Draft talking points re:		
	NYCPRIVO		421-a - Homeless		
353	2355	Attorney Client; Deliberative	Preference	NP	Per City's Agreement
	NYCPRIV0		Email chain re: 421-a -		
354	2360	Deliberative	Homeless Preference	NP	Per city's Agreement
					communication re: East Harlem Displacement number error in
355	NYCPRIVO 2362	Deliberative	Email chain re: Anti- displacement strategies	DPP	connection with preparing scope of work for RFP; PRODUCE UNDER RODRIGUEZ
333	2302	Deliberative	displacement strategies	D1.1	communications re:
					albany housing agenda
					presentation and mayor's
	NYCPRIVO		Email chain re: Application		talk with Castro about
356	2063	Deliberative	of Community Preference	NP	СРР
	NYCPRIVO	Attorney Client;Deliberative;Work	Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re:	AC &	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal
357	2066	Product	Community Preference	DPP	advice
358	NYCPRIVO 2393	Deliberative; Legislative	Draft talking points re: Anti- displacement strategies	DPP & Legislat ive	version of proposed bill advocated by Administation to prevent Tenant harassment; PRODUCE UNDER RODRIGUEZ
			Draft presentation re:		
			Litigation - Anticipated		
		Attorney	Litigation re: Community		draft of document
	NYCPRIVO	Client;Deliberative;Work	Preference;Litigation -	AC &	analyzing settlement
359	 2398	Product	Winfield Litigation	WP	options
360	NYCPRIVO 3973	Attorney Client	Email chain re: Community Opposition Strategies	NP	Per City's Agreement

				I	durft de de la
			Droft Internal		draft decision memo to
			Draft Internal		mayor re: creation of MIH
	************		Memorandum re:		program and
	NYCPRIVO		Commitment to Fair	AC &	seeking/reflecting legal
361	2079	Attorney Client; Deliberative	Housing	DPP	advice
			Draft talking points re:		
	NYCPRIVO		Application of Community		
362	2086	Deliberative	Preference	NP	Per City's Agreement
			- 6		draft decision memo to
			Draft Internal		mayor re: creation of MIH
			Memorandum re:	_	program and
	NYCPRIVO		Commitment to Fair	AC &	seeking/reflecting legal
363	2087	Attorney Client; Deliberative	Housing	DPP	advice
					draft decision memo to
			Draft Internal		mayor re: creation of MIH
			Memorandum re:		program and
	NYCPRIVO			AC &	seeking/reflecting legal
364	2088	Attorney Client; Deliberative	Housing	DPP	advice
					draft submission to
					receive an award for
					innovations in
					government - public
	NYCPRIVO		Draft Document re: Anti-		engagement unit
365	2412	Deliberative		NP	submission
			Internal Memorandum re:		
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
366	2487	Work Product	Data Analysis	WP	litigation strategy
			Internal Memorandum re:		
	*************		Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
367	2488	Work Product	Data Analysis	WP	litigation strategy
250	NYCPRIVO		Notes re: Litigation -		Analysis for informing
368	2490	Work Product	Winfield Litigation Internal Memorandum re:	WP	litigation strategy
			Litigation - Winfield		
			Litigation; Application of		tankatan katan Can
	ALL/CDD II /O		Community		technical notes for
200	NYCPRIVO 2491	Dalibarativa Mark Bradust	Preference; Housing	W/D	housing study for
369	2491	Deliberative;Work Product	Connect Data Analysis	WP	litigation
			Internal Memorandum re:		
			Litigation - Winfield		
			Litigation; Application of		technical notes for
	NYCPRIVO		Community		housing study for
270	2493	Dolihorativo: Mark Brodust	Preference; Housing	WD	~ '
370	2493	Deliberative;Work Product	Connect Data Analysis	WP	litigation internal deliberations
	NYCPRIVO		Draft report re: Litigation -	WP &	regarding analysis for
371	2496	Deliberative Work Product	Winfield Litigation	DPP	
3/1	2490	Deliberative;Work Product	Draft presentation re:	DFF	litigation
			Litigation - Winfield		
			Litigation; Application of		
			Community		
	NYCPRIVO		Preference; Housing		
372	2497	Deliberative;Work Product		NP	Per City's Agreement
3/2	2497	Deliberative, Work Product	Draft presentation re:	INF	r or only a Agreement
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		
373	2498	Deliberative;Work Product		NP	Per City's Agreement
5/3	2490	Deliberative, Work Product	Data Aliaiysis	INT	i ci city s Agreement

			Draft report rev Litigation		
	NYCPRIVO		Draft report re: Litigation - Winfield Litigation; Housing		
374	2501	Deliberative;Work Product	Connect Data Analysis	NP	Per City's Agreement
374	2301	Deliberative, Work Froduct	Internal Charts or Maps re:	INF	analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
375	2502	Deliberative;Work Product	Litigation	DPP	settlement
373	2302	Deliberative, Work Froduct	Draft presentation re:		Settlement
			Litigation - Winfield		
			Litigation; Application of		
			Community		
	NYCPRIVO		Preference; Housing		
376	2504	Deliberative;Work Product	Connect Data Analysis	NP	Per City's Agreement
			,,,,,		,
					Internal presentation of
					internal study of various
					data conducted to inform
					litigation strategy and
	NYCPRIVO		Draft report re: Litigation -	WP &	settlement position in
377	2506	Deliberative;Work Product	Winfield Litigation	DPP	Winfield
			Draft report re: Litigation -		
	NYCPRIV0		Winfield Litigation; Housing		
378	2507	Deliberative;Work Product	Connect Data Analysis	NP	Per City's Agreement
			,		, ,
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
379	2508	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft presentation re:		
			Litigation - Winfield		
			Litigation; Application of		
			Community		
	NYCPRIV0		Preference;Housing		
380	2510	Deliberative;Work Product	Connect Data Analysis	NP	Per City's Agreement
					Internal presentation of
					internal study of various
					data conducted to inform
			Draft report re: Litigation -		litigation strategy and
	NYCPRIV0		Winfield Litigation; Housing		settlement position in
381	2511	Deliberative;Work Product	Connect Data Analysis	DPP	Winfield
			Draft presentation re:		
			Litigation - Winfield		
202	NYCPRIVO	D 19 W. 1 1	Litigation; Housing Connect		D 011 L 4
382	2513	Deliberative;Work Product	Data Analysis	NP	Per City's Agreement
			Droft rong at any 1995-199		analysis to inform
	AUVCDDUVO		Draft report re: Litigation -	M/D C	analysis to inform
202	NYCPRIVO	Dolih avative AMerik Breeder	Winfield Litigation; Housing		litigation strategy and
383	2515	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Droft roport rev Litiest		analysis to info
	AUVCDDUVO		Draft report re: Litigation -	M/D C	analysis to inform
204	NYCPRIVO	Doliharativa Maris Brades	Winfield Litigation; Housing		litigation strategy and
384	2526	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft presentation re:		
			Litigation - Winfield		
			Litigation; Application of		analysis to inform
	NVCDDIVO		Community	\A/D 9:	analysis to inform
385	NYCPRIVO 2527	Deliberative;Work Product	Preference; Housing	WP & DPP	litigation strategy and settlement
303	2327	Democrative, WOLK PLOUDEL	Connect Data Analysis	טרר	settienit

				Internal Charts or Maps re:		
				Litigation - Winfield		analysis to inform
	NYCP			Litigation; Housing Connect		litigation strategy and
386	2536	-	Deliberative;Work Product	Data Analysis	DPP	settlement
				Darft and a Hillard a		
	NIVCD	ND IV (O		Draft report re: Litigation -	M/D 0	analysis to inform
207	NYCP		Bullbarratt a Maril Barrillat	Winfield Litigation; Housing		litigation strategy and
387	2537		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Internal Charts or Maps re:		analysis to inform
	NIVCD	ND IV (O		Litigation - Winfield	M/D 0	analysis to inform
200	NYCP		Dalibanski sa Manda Dua da at	Litigation; Housing Connect		litigation strategy and
388	2538		Deliberative;Work Product	Data Analysis	DPP	settlement
				Draft ranget ray Litigation		analysis to inform
	NIVCD	ND IV (O		Draft report re: Litigation -	M/D 0	analysis to inform
200	NYCP		Deliberation Med Decided	Winfield Litigation; Housing		litigation strategy and
389	2540		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Internal Charts or Maps re:		analysis to inform
	NIVCD	ND IV (O		Litigation - Winfield	M/D 0	analysis to inform
200	NYCP		Dalibanski sa Manda Dua da at	Litigation; Housing Connect		litigation strategy and
390	2542		Deliberative;Work Product	Data Analysis	DPP	settlement
				Draft rapart ray litication		analysis to inform
	NYCP	DIVO		Draft report re: Litigation - Winfield Litigation; Housing	\A/D 0	analysis to inform
201			Dalibanstina Manda Duadant			litigation strategy and
391	2543		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Internal Charts or Maps re:		analysis to inform
	NIVCD	ים יים		Litigation - Winfield	M/D 0	analysis to inform
202	NYCP 2546		Dalihamativa Mark Dradust	Litigation; Housing Connect	DPP	litigation strategy and
392	2540		Deliberative;Work Product	Data Analysis Draft report re: Litigation -	DPP	settlement
				Winfield		
				Litigation; Application of		analysis to inform
	NIVCD	יטיאים		Community	WP &	analysis to inform
202	NYCP		Dalibanstina Manda Duadant	Preference; Housing		litigation strategy and
393	2558		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Internal Charts or Maps re:		analysis to inform
	NIVCD	יטייטי		Litigation - Winfield	M/D 0	analysis to inform
204	NYCP		Dalihamativa Mark Dradust	Litigation; Housing Connect		litigation strategy and
394	2559		Deliberative;Work Product	Data Analysis Internal Charts or Maps re:	DPP	settlement
				Litigation - Winfield		analysis to inform
	NYCP	DRIVO		Litigation: Housing Connect	\A/D 9.	litigation strategy and
395	2560		Deliberative;Work Product	Data Analysis	DPP	settlement
333	2300		Democrative, WOIN FIDUALL	Data Allalysis	511	Settlement
				Draft report re: Litigation -		analysis to inform
	NYCP	RIVO		Winfield Litigation; Housing	WP &	litigation strategy and
396	2575		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
390	23/3		Democrative, Work Floudel	Draft report re: Litigation -	5.1	Jettiement
				Winfield		
				Litigation; Application of		
				Community		analysis to inform
	NYCP	PRIVO		Preference;Housing	WP &	litigation strategy and
397	2576		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
337	2370		- czeradire, rronk i rodact	Internal Charts or Maps re:		- Continuit
				Litigation - Winfield		analysis to inform
	NYCP	PRIVO		Litigation; Housing Connect	WP &	litigation strategy and
398	2577		Deliberative;Work Product	Data Analysis	DPP	settlement
330	23//		Deliberative, WOLK Floudet	Data Allalysis	DFF	SCHEIHEIH

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			Draft report re: Litigation -		
			Winfield		
			Litigation; Application of		
			Community		analysis to inform
	NYCPRIVO		Preference;Housing	WP &	litigation strategy and
399	2578	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect		litigation strategy and
400	2579	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing		litigation strategy and
401	2580	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft Internal		
			Memorandum re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect		litigation strategy and
402	2581	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		
			Winfield		
			Litigation; Application of		analysis to info
			Community	WE C	analysis to inform
400	NYCPRIVO		Preference; Housing	WP &	litigatoin strategy and
403	2582	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NIVCDDIVO		Litigation - Winfield	M/D 9	analysis to inform
404	NYCPRIVO		Litigation; Housing Connect	DPP	litigation strategy and
404	2583	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	\Λ/D &.	litigation strategy and
405	2584	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
403	2504	Deliberative, work froduct	Connect Bata / thanysis	DIT	Settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
406	2585	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
407	2586	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft report re: Litigation -		
			Winfield		
			Litigation;Application of		
			Community		analysis to inform
	NYCPRIVO		Preference; Housing	WP &	litigation strategy and
408	2587	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
409	3974	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		
			Winfield		
			Litigation; Application of		
			Community		analysis to inform
	NYCPRIV0		Preference;Housing	WP &	litigation strategy and
410	2588	Deliberative;Work Product	Connect Data Analysis	DPP	settlement

			Draft report re: Litigation -		
			Winfield		
			Litigation; Application of		
			Community		analysis to inform
	NYCPRIVO		Preference;Housing	WP &	litigation strategy and
411	2589	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
412	2590	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
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			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
413	2591	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
113	2331	Deliberative, Work Froduct	Connect Buta / marysis	D	Sectionicité
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	\A/D 2.	litigation strategy and
414	2592	Deliberative;Work Product		DPP	settlement
414	2592	Deliberative, Work Product	Connect Data Analysis	DPP	settiement
			Draft rapart ray Litization		analysis to inform
	NIVCDD!! (C		Draft report re: Litigation -	MAC C	analysis to inform
	NYCPRIVO	D. 11	Winfield Litigation; Housing		litigation strategy and
415	2593	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV0		Litigation; Housing Connect		litigation strategy and
416	2595	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIV0		Winfield Litigation; Housing	WP &	litigation strategy and
417	2506	Dultharant a Maria David at	Campant Data Amalusia		cottlomont
71/	2596	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
71/	2596	Deliberative; Work Product	Internal Charts or Maps re:	DPP	settlement
711	2590	Deliberative; Work Product		DPP	analysis to inform
717	NYCPRIVO	Deliberative; work Product	Internal Charts or Maps re:		
418			Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect		analysis to inform
	NYCPRIVO	Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield	WP &	analysis to inform litigation strategy and
	NYCPRIVO		Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis Internal Charts or Maps re:	WP &	analysis to inform litigation strategy and settlement
	NYCPRIVO		Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield	WP &	analysis to inform litigation strategy and settlement analysis to inform
	NYCPRIVO 2597	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect	WP &	analysis to inform litigation strategy and settlement
418	NYCPRIVO 2597 NYCPRIVO		Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield	WP & DPP	analysis to inform litigation strategy and settlement analysis to inform litigation strategy and
418	NYCPRIVO 2597 NYCPRIVO	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement analysis to inform litigation strategy and settlement
418	NYCPRIVO 2597 NYCPRIVO 2602	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation -	WP & DPP	analysis to inform litigation strategy and settlement analysis to inform litigation strategy and settlement analysis to inform
418	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO	Deliberative;Work Product Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing	WP & DPP WP & DPP	analysis to inform litigation strategy and settlement analysis to inform litigation strategy and settlement analysis to inform litigation strategy and
418	NYCPRIVO 2597 NYCPRIVO 2602	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation -	WP & DPP	analysis to inform litigation strategy and settlement analysis to inform litigation strategy and settlement analysis to inform
418	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO	Deliberative;Work Product Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis	WP & DPP WP & DPP	analysis to inform litigation strategy and settlement analysis to inform litigation strategy and settlement analysis to inform litigation strategy and settlement
418	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605	Deliberative;Work Product Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation -	WP & DPP	analysis to inform litigation strategy and settlement
418	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605	Deliberative;Work Product Deliberative;Work Product Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing	WP & DPP WP & DPP WP & WP & DPP	analysis to inform litigation strategy and settlement
418	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605	Deliberative;Work Product Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
418	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605	Deliberative;Work Product Deliberative;Work Product Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re:	WP & DPP WP & DPP WP & WP & DPP	analysis to inform litigation strategy and settlement
418	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605	Deliberative;Work Product Deliberative;Work Product Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement analysis to inform
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2606	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement
418	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605	Deliberative;Work Product Deliberative;Work Product Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement analysis to inform
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2606	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Data Analysis Internal Charts or Maps re:	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2606 NYCPRIVO 2610	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement analysis to inform
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2606 NYCPRIVO 2610 NYCPRIVO	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2606 NYCPRIVO 2610	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement analysis to inform
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2606 NYCPRIVO 2610 NYCPRIVO	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re:	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2606 NYCPRIVO 2610 NYCPRIVO	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis	WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2606 NYCPRIVO 2610 NYCPRIVO	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re:	WP & DPP WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement
418 419 420 421	NYCPRIVO 2597 NYCPRIVO 2602 NYCPRIVO 2605 NYCPRIVO 2610 NYCPRIVO 2611	Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Draft report re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation; Housing Connect Data Analysis Internal Charts or Maps re: Litigation - Winfield	WP & DPP WP & DPP WP & DPP WP & DPP	analysis to inform litigation strategy and settlement analysis to inform litigation strategy and settlement

			Internal Charts or Mans re-		analysis to inform
	NIVCDDIV		Internal Charts or Maps re:	WP &	analysis to inform
425	NYCPRIV		Litigation - Winfield		litigation strategy and
425	2613	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		
	NIV CDDIIV		Litigation - Winfield	W.D. 0	analysis to inform
426	NYCPRIV		Litigation; Housing Connect		litigation strategy and
426	2614	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV		Litigation; Housing Connect		litigation strategy and
427	2615	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV	D	Litigation; Housing Connect	WP &	litigation strategy and
428	2617	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV		Litigation; Housing Connect	WP &	litigation strategy and
429	2619	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV		Litigation; Housing Connect	WP &	litigation strategy and
430	2620	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV		Litigation; Housing Connect	WP &	litigation strategy and
431	2621	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV		Litigation; Housing Connect	WP &	litigation strategy and
432	2622	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV		Litigation; Housing Connect	WP &	litigation strategy and
433	2655	Deliberative;Work Product	Data Analysis	DPP	settlement
.55					
			Draft report re: Litigation -		analysis to inform
	NYCPRIV	n	Winfield Litigation; Housing	WP &	litigation strategy and
434	2656	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
154	2030	_ = ==================================	25St Bata / illalysis		analysis to inform
	NYCPRIV		Draft report re: Litigation -	WP &	litigation strategy and
435	2657	Deliberative;Work Product	Winfield Litigation	DPP	settlement
433	2037	2 Silverative, Work Froudet	Draft Document re:	J	occarding it
			Litigation - Winfield		analysis to inform
	NYCPRIV	1	Litigation: Willied Litigation; Housing Connect	WP &	litigation strategy and
436	2658	Deliberative;Work Product	Data Analysis	DPP	settlement
430	2036	Democrative, WOIK FIDUUCL	Draft Document re:	DI F	Jetuenient
			Litigation - Winfield		
			Litigation; AFFH and		
			Community		analysis to inform
	NYCPRIV		' '	M/D 9	analysis to inform
427			Preference; Housing	WP &	litigation strategy and
437	2659	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
					from our order for a coloring
			D ft	LA/D 0	framework for analysis to
	NYCPRIV		Draft report re: Litigation -	WP &	inform litigaton strategy
438	2660	Deliberative;Work Product	Winfield Litigation	DPP	and settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV		Litigation - Winfield	WP &	litigation strategy and
439	2668	Deliberative;Work Product	Litigation	DPP	settlement

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			Internal Charts or Maps re:	_	analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
440	2669	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
441	2670	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
442	2671	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
443	2672	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		
	NYCPRIVO		Litigation - Winfield		Analysis for informing
444	2673	Work Product	Litigation	WP	litigation strategy
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
445	2674	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
446	2676	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		
	NYCPRIVO		Litigation - Winfield		Analysis for information
447	2679	Work Product	Litigation	WP	litigation strategy
			Internal Charts or Maps re:		
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
448	2680	Work Product	Data Analysis	WP	litigation strategy
			Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
449	2681	Deliberative;Work Product	Litigation	DPP	settlement
		,	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
450	2682	Deliberative;Work Product	Litigation	DPP	settlement
		·	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
451	2686	Deliberative;Work Product	Litigation	DPP	settlement
		· ·	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
452	2687	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
453	2692	Work Product	Data Analysis	WP	litigation strategy
			Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
454	2695	Deliberative;Work Product	Litigation	DPP	settlement
		, , , , , , , , , , , , , , , , , , , ,	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
455	2696	Deliberative;Work Product	Litigation	DPP	settlement
		, , , , , , , , , , , , , , , , , , , ,	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
456	2700	Deliberative;Work Product	Litigation	DPP	settlement
,55	2,00	sind a strop tronk i roudet	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
457	2701	Deliberative;Work Product	Litigation	DPP	settlement
737	2701		Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
458		Deliberative;Work Product	Litigation - Willield	DPP	settlement
430	2/02	Denderative, Work Froudet	Lingarion	ייכן	Sectionient

			Internal Charts or Maps re:		analysis to inform
	NYCPRIV		Litigation - Winfield	WP &	litigation strategy and
459	2703	Deliberative; Work Product	Litigation	DPP	settlement
433	2703	Deliberative, Work Froduct	Internal Charts or Maps re:	DFF	analysis to inform
	NYCPRIV		Litigation - Winfield	WP &	litigation strategy and
460	2704	Deliberative;Work Product	Litigation	DPP	settlement
400	2704	Denserative, work i roudet	Internal Charts or Maps re:	D11	Settlement
			Anti-displacement		analysis to inform
	NYCPRIV		strategies; Litigation -	WP &	litigation strategy and
461	2746	Deliberative; Work Product	Winfield Litigation	DPP	settlement
.02			Internal Charts or Maps re:		
			Litigation - Winfield		
			Litigation; AFFH and		
			Community		
	NYCPRIV) 	Preference; Housing		Analysis for informing
462	2747	Work Product	Connect Data Analysis	WP	litigation strategy
			Internal Charts or Maps re:		
			Litigation - Winfield		draft data analysis to
	NYCPRIV		Litigation; AFFH and		inform litigation strategy
463	2748	Deliberative	Community Preference	WP	and settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIV		Winfield Litigation; Housing	WP &	litigation strategy and
464	2749	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
					describes housing and
					neighborhood study
					conducted for purposes
					of evaluating impact of
			Final report (non-public)		subsidized housing on
			re: Application of		health and well being and
			Community		school performance;
	NYCPRIV		Preference;Housing		PRODUCE UNDER
465	2760	Deliberative	Connect Data Analysis	DPP	RODRIGUEZ
	*********		Notes re: Litigation -		
	NYCPRIV		Winfield Litigation; Housing		Analysis for informing
466	2753	Work Product	Connect Data Analysis	WP	litigation strategy
					Analysis for informing
			Draft Document		Analysis for informing litigation strategy; in
			Draft Document re: Litigation - Winfield		anticipation of litigation;
	NYCPRIV				FOIL request from
467	2754	Work Product	Litigation; Housing Connect Data Analysis	WP	plaintiff's counsel
407	2/54	WOIK PIOUULL	Data Allalysis	VVP	piairiuii s courisei
			Notes re: Litigation -		created to respond to
	NYCPRIV		Winfield Litigation; Housing		FOIL request made by
468	3990	Work Product	Connect Data Analysis	WP	Gurion
400	3330	VVOIR FFOUNCE	Connect Data Analysis	701	Carlott
	NYCPRIV		Draft report re: Litigation -		Analysis for informing
469	2755	Work Product	Winfield Litigation	WP	litigation strategy
403	2733	Jik i loddot	Draft Internal		decision memo to mayor
			Memorandum re:		re: MIH
	NYCPRIV		Commitment to Fair	AC &	seeking/reflecting legal
470	2093	Attorney Client; Deliberative	Housing	DPP	advice
7,0	2055	Corney Cheric, Deliberative	10001116		44.100

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471	NYCPRIVO 3991	Deliberative	Draft letter re: Anti- displacement strategies;421-a - Homeless Preference	NP	Draft letter from Mayor to constituents re: affordable housing
472	NYCPRIVO 3992	Attorney Client;Deliberative	Draft Internal Memorandum re: MIH - Anti-displacement strategies;Application of Community Preference	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
473	NYCPRIVO 3998	Deliberative	Draft report re: MIH - Anti- displacement strategies;Application of Community Preference	DPP	Decision memo to mayor re: how to engage with private applications subject to MIH at Barnett Ave.; DO NOT PRODUCE UNDER RODRIGUEZ
474	NYCPRIVO 4004	Deliberative	Final letter (non-public) re: MIH - Anti-displacement strategies;ENY - Anti- displacement strategies	NP	produce; same as 310
475	NYCPRIVO 4007	Deliberative	Draft talking points re: Anti- displacement strategies	NP	draft Q&As re: afffordable housing in connection with 2015 mayor state of city address
476	NYCPRIVO 4016	Attorney Client	Draft report re: Anti- displacement strategies;ENY - Anti- displacement strategies	AC	communication from attorney summarizing thoughts and next steps on affordable housing in specific neighborhood
477	NYCPRIVO 4082	Attorney Client;Deliberative	Email chain re: Anti- displacement strategies;Commitment to Fair Housing	DPP	communication re: draft RFP for HRA program reflecting comments and revisions; DO NOT PRODUCE UNDER RODRIGUEZ
478	NYCPRIVO 4088	Attorney Client;Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	AC	attorney comments and revisions to anti- harassment tenant protection program RFP
479	NYCPRIVO 4089	Deliberative	Email chain re: Anti- displacement strategies	NP	communications re: draft press release for legal services for tenants
480	NYCPRIVO 4090	Attorney Client;Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	AC	attorney comments and revisions to anti- harassment tenant protection program RFP

					attorney comments and
			Draft report re:		revisions to anti-
	NYCPRIVO		Commitment to Fair		harassment tenant
481	4107	Deliberative		AC	
481	4107	Deliberative	Housing Draft talking points re: Anti-	AC	protection program RFP
					testimony of Jordan Dressler before NYC
	ALV CDDII (O		displacement		
400	NYCPRIV0	5 til	strategies;Commitment to		Council committee on
482	4114	Deliberative	Fair HousingNP	NP	2017 budget
			Draft Internal		
			Memorandum; Notes re:		
			Anti-displacement		
			strategies; Litigation -		
			Anticipated Litigation re:		
			Community		Research for informing
	NYCPRIV0		Preference; Litigation -		litigation strategy and
483	2432	Work Product	Winfield Litigation	WP	settlement position
			Draft report;Internal		
			Charts or Maps re:		
			Litigation - Winfield		
	NYCPRIV0		Litigation; Application of	WP &	discussing settlement
484	2433	Deliberative;Work Product	Community Preference	DPP	options in this case
	- 100				Communication
					concerning topic for
			Email chain; Notes re: 421-		which legal advice is
			a - Homeless		sought re: application of
	NYCPRIVO				
405		Attorno a Cliant Dalibanti .	Preference; Application of	4.0	CPP a certain lottery
485	2434	Attorney Client; Deliberative	Community Preference	AC	applicant
	ANVCDDING.		Durft and a title of		All continues CDD
406	NYCPRIVO	Wed Bed at	Draft report re: Litigation -	\4/D	Atty questions re: CPP
486	2436	Work Product	Winfield Litigation	WP	and statistical tests
			Internal Charts or Moneyo		
			Internal Charts or Maps re:		
			Litigation - Anticipated		and date to the
			Litigation re: Community		analysis to inform
	NYCPRIV0		Preference;Litigation -	WP &	litigation strategy and
487	2440	Deliberative;Work Product	Winfield Litigation	DPP	settlement
					notes discussing
	NYCPRIV0		Notes re: Litigation -	WP &	settlement options in this
488	2442	Deliberative;Work Product	Winfield Litigation	DPP	case
			Internal Charts or Maps re:		
			Litigation - Winfield		
	NYCPRIV0		Litigation; Housing Connect		Analysis for informing
489	2443	Work Product	Data Analysis	WP	litigation strategy
			Internal Charts or Maps re:		
			Litigation - Anticipated		
			Litigation re: Community		analysis to inform
				MAID O	litigation strategy and
	NYCPRIVO		Preference; Litigation -	WP &	indigation strateby and
490	NYCPRIVO 2444	Deliberative;Work Product	Preference; Litigation - Winfield Litigation	MP & DPP	settlement
490		Deliberative;Work Product			
490		Deliberative;Work Product			
490		Deliberative;Work Product	Winfield Litigation Draft report; Notes re:		
490		Deliberative;Work Product	Winfield Litigation Draft report; Notes re: Litigation - Anticipated		
490	2444	Deliberative;Work Product	Winfield Litigation Draft report; Notes re: Litigation - Anticipated Litigation re: Community	DPP	settlement
490		Deliberative; Work Product Deliberative; Work Product	Winfield Litigation Draft report; Notes re: Litigation - Anticipated		

492	NYCPRIVO 2446	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
493	NYCPRIVO 2447	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation	WP & DPP	description of studies about gentrification & displacement relevant to case analysis
494	NYCPRIVO 2449	Deliberative; Legislative	Notes re: 421-a - Homeless Preference	DPP	Internal working notes reflecting questions/considerations in determining implementation of certain preferences; DO NOT PRODUCE UNDER RODRIGUEZ
495	NYCPRIVO 2453	Deliberative	Draft talking points;Draft Document re: Anti- displacement strategies	NP	notes on draft talking points about Inwood Neighborhood study
496	NYCPRIVO 2454	Deliberative	Notes;Internal Memorandum re: Community Opposition Strategies	DPP	notes from neighborhood strategies team meeting about preserving housing; reflects internal discussions about policy strategies; DO NOT PRODUCE UNDER RODRIGUEZ
497	NYCPRIVO 4118	Deliberative	Notes re: Anti- displacement strategies	DPP	action steps and strategies related to homeless prevention policy; DO NOT PRODUCE UNDER RODRIGUEZ
498	NYCPRIVO 2481	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies
499	NYCPRIVO 2482	Attorney Client;Deliberative;Work Product	Notes;Draft Document re: Litigation - Winfield Litigation;Commitment to Fair Housing	NP	Per City's Agreement (except p. 5 which are attorney notes)
500	NYCPRIVO 2485	Work Product	Draft Document re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies