

Respondents-Defendants.

For a Judgment pursuant to Article 78 and for
Declaratory Judgment under Article 30 of the Civil
Practice Law and Rules

STATE OF NEW YORK)

SS:)

COUNTY OF NEW YORK)

AFFIDAVIT OF MICHAEL PIAZZA

MICHAEL PIAZZA, being duly sworn, deposes and says the following under penalty of perjury:

1. I am Michael Piazza, Commissioner of the Putnam County Departments of Mental Health, Social Services, and Youth Bureau.
2. I am familiar with the facts of the above-captioned case and submit this affidavit in support of the Cross-Motion being brought by the Putnam County Defendants, and in Opposition to Petitioner-Plaintiffs Verified Article 78 Petition, Article 30 Application for Declaratory Judgment, and request for a preliminary injunction.
3. As part of the responsibilities of my position I am tasked with overseeing the emergency housing process for anyone in need of emergency transitional housing through the Department of Social Services.
4. There are other agencies and/or not-for-profits which are also responsible for assisting with emergency and /or transitional housing that are not within the jurisdiction of the Department of Social Services.
5. As such, there is a shortage of available emergency housing options in Putnam County.

6. There are exactly 185 Rooms available in Putnam County, which are divided across 6 motels/hotels:

- a) Bel Aire Motor Lodge – 1574 Route 22, Brewster, NY 12508
- b) Henry Van Motel – 40 Sodom Road, Brewster, NY 10509
- c) Comfort Inn – 7-11 Peach Law Road, Brewster, NY 10509
- d) Heidi's Inn – 1270 NY-22, Brewster, NY 10509
- e) Country Side Motel – 3577 Route 9, Cold Spring, NY 10516
- f) Budget Motor Inn – 215 US-6, Mahopac, NY 10541

7. Unfortunately, there is no unified electronic reporting system in Putnam County wherein the various agencies, not-for-profits, and/or departments can share reporting information for where individuals are housed.

8. There are also people with low incomes who reside in these motels as a form of affordable housing, which are realities that bear on housing availability, but I do not have statistics to provide this Court with an accounting of how many such persons there are. And there are persons who use the motel while in transit.

9. As a result, I can only comment on vacancies at the time of my staff's calls to inquire between June 11th, 2023, and on June 25th, 2023, and as to the people the Department of Social Services currently has housed.

10. As of June 25th, 2023, of the 185 motel rooms available in the County 80% were occupied. Meaning a total availability of 40 empty rooms.

11. Currently, the Department of Social Services has one (1) sex offender on probation supervision placed in this transitional housing and three (3) evicted, now homeless, people.

12. Despite what may facially appear to be comparatively low numbers of transitional need, there are only 40 out of 185 total rooms vacant.

13. This demonstrates how many of the other categories of people in transitional housing, whether self-paid by low-income County residents, private agencies, or not-for-profits. Private businesses that house transient workers, and regular travelers or any other purposes that individuals and families are making use of these facilities.

14. Upon information and belief, the source of which is my knowledge of the asylum seeker placement issue and my reports to County Government, it is due to this housing and resources shortage that the Putnam County Executive Orders (Annexed as Exhibit B) sought to ensure the responsible acquisition of social services to asylum seekers or other people of transitional immigration status in this Country, by requiring clear, continuous, and ultimately written communication between Putnam County and New York County (or any other County seeking such placement in Putnam).

15. This ensures first, that there is confirmed housing available.

16. Second, the two Counties would review all of the services the individuals require to ensure that Putnam County had the necessary resources.

17. Finally, the Counties would reach a shared services agreement ensuring unequivocal clarity as to which County was providing which services, and which County would cover each expense.

18. Shared services agreements of this nature prevent gaps in services through oversights, avoid controversy between Counties, and ensure that asylum seekers already dealing with the trauma of moving through the challenging process of seeking asylum have a smooth transition to their new temporary housing where they feel safe, welcome, and have their needs provided for.

19. To date, to my knowledge, New York County has attempted to place such asylum seekers in Putnam County without going through official channels. This information was reported to the Department of Social Services by the motel/ hotel owner who reported to the Department that he had refused the request. At no time was the County of Putnam notified of this request by New York County.

20. Nor, to date, has Putnam County ever outright refused placement of any asylum seeker in their County.

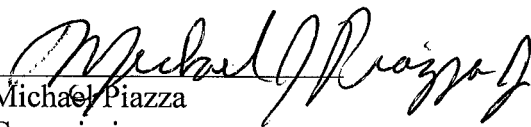
21. Nor has Putnam ever refused services to any such asylum seekers at any time to date.

22. Should this Court have additional questions upon reading this affidavit, I stand ready to assist this Court in any and all respects to ensure that this Court has the information it requires to reach a decision in this matter.

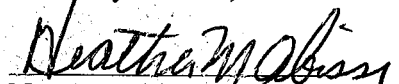
23. Should this Court need to reach me, my business contact information is as follows:

- a. Michael Piazza
Commissioner
Putnam County Departments of
Mental Health,
Social Services, &
Youth Bureau
110 Old Route 6
Carmel, NY 10512
845-808-1500 x45201
Michael.PiazzaJr@dfa.state.ny.us

Date: 6/26/23


Michael Piazza
Commissioner

Sworn to before me this
26th Day of June, 2023


Notary Public

WEATHER M. ABISSI
Notary Public - State of New York
No. 02466404425
Qualified in Dutchess County
My Commission Expires Feb. 18, 2024