



U.S. Department of Housing and Urban Development
New York State Office
Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278-0068
<http://www.hud.gov/local/nyn/>

APR 5 2012

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert M. Pascucci
General Partner
JMI Management, Inc.
277 Northern Boulevard
Great Neck, NY 11021

Dear Mr. Pascucci:

SUBJECT: **AFFIRMATIVE FAIR HOUSING MARKETING PLAN APPROVAL**

Project Name: Roslyn Plaza Gardens

Contract No.: NY36H108023

Locality: Roslyn Heights, NY 11577

The Affirmative Fair Housing Marketing Plan (AFHMP) for the above project is approved. The purpose of affirmative marketing is to provide opportunities for individuals of similar income levels in the same housing area to have an equal range of housing to choose from, regardless of race, color, religion, sex, national origin, disability or familial status.

The following are the procedures which an owner is required to follow:

1. The approved Plan (enclosed) must be available at all times for public inspection in the sales or rental office.
2. Copies of all newspaper advertisements and community contact letters must be sent to this Office immediately following the date of the first advertisement for rental marketing efforts.

It is incumbent upon the owner to make certain that all advertisements and community contact letters conform to the HUD-approved marketing plan and/or the Section 8 Rent-up procedures. Any failure in this regard could necessitate additional marketing or re-marketing efforts.

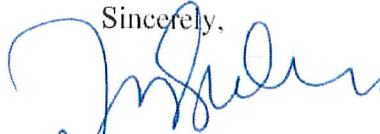
3. A HUD approved poster (enclosed) must be prominently displayed in all offices in which rental activity takes place.
4. The HUD approved Equal Housing Opportunity logo, slogan or statement must be included in all printed material used in connection with sales or rentals.

5. All advertising, **such** as brochures or newspaper ads, should be void of all words, phrases, **sym**bols, and/or descriptions, which tend to indicate a racial, religious, or **cultural** characteristic.
6. The FHEO Rental **Housing-Affirmative** Fair Housing Marketing Report should be **completed** and returned two weeks after your selections.

We have also enclosed Affirmative Fair Housing Marketing Plan Guidance for your use.

If there are any **questi**ons regarding the attached documents, please contact Ms. Christine Martinez of this **offi**ce at 212-542-7518.

Sincerely,



Jo-Ann Frey, Director
New York FHEO Center
Office of Fair Housing and
Equal Opportunity

Enclosures

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/hudportal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013
(exp. 8/31/2013)

1a. Project Name & Address (including City, County, State & Zip Code) Roslyn Plaza Gardens 100 Laurel Street Roslyn Heights, NY 11577	1b. Project Contract Number NY36H108023; 012-11322 1d. Census Tract 3022 1e. Housing/Expanded Housing Market Area Nassau County NY	1c. No. of Units 104
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1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address
 JMI Management Company
 277 Northern Boulevard, Great Neck, NY 11021, Phone, 516 487-0041, Email -GTIBER@jmimgt.biz

1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address
 Roslyn Plaza Housing Associates
 277 Northern Boulevard, Great Neck, NY 11021, Phone 516 487-0050, Email - GTIBER@mimgt.biz

1h. Entity Responsible for Marketing (check all that apply)
☐ Owner ☒ Agent ☐ Other (specify) _____
 Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address
 Gayle C. Tiber, Sr. Property Manager, JMI Management Company, 277 Northern Boulevard, Great Neck, NY 11021, Phone 516487-0041, Email - GTIBER@mimgt.biz

1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.
 Robert M. Pascucci, General Partner
 JMI Management, Inc., 277 Northern Boulevard, Great Neck, NY 11021, Phone, 516 487-0041, Email -GTIBER@mimgt.biz

2a. Affirmative Fair Housing Marketing Plan
 Plan Type Date of the First Approved AFHMP:
 Reason(s) for current update:

2b. HUD-Approved Occupancy of the Project (check all that apply)
☐ Elderly ☒ Family ☐ Mixed (Elderly/Disabled) ☐ Disabled

2c. Date of Initial Occupancy

2d. Advertising Start Date
 Advertising must begin *at least* 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects.
 Date advertising began or will begin
 For existing projects, select below the reason advertising will be used:
☐ To fill existing unit vacancies
☒ To place applicants on a waiting list (which currently has individuals)
☐ To reopen closed waiting list (which currently has individuals)

3a. Demographics of Project and Housing Market Area
Complete and submit Worksheet 1.

3b. Targeted Marketing Activity

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

- ☒ White ☒ American Indian or Alaska Native ☒ Asian ☐ Black or African American
☒ Native Hawaiian or Other Pacific Islander ☒ Hispanic or Latino ☐ Persons with Disabilities
☐ Families with Children ☐ Other ethnic group, religion, etc. (specify)

4a. Residency Preference

Is the owner requesting a residency preference? If yes, complete questions 1 through 5.

If no, proceed to Block 4b.

(1) Type

(2) Is the residency preference area:

The same as the AFHMP housing/expanded housing market area as determined in Block 1e?

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

4b. Proposed Marketing Activities: Community Contacts

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

4c. Proposed Marketing Activities: Methods of Advertising

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, Internet advertisements, websites, and brochures, etc.

5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☐ Other (specify)

5b. Affirmative Fair Housing Marketing Plan

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☐ Other (specify)

5c. Project Site Sign

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

☒ Rental Office ☐ Real Estate Office ☐ Model Unit ☒ Entrance to Project ☐ Other (specify)

The size of the Project Site Sign will be 8.5" x 11"

The Equal Housing Opportunity logo or slogan or statement will be 1.5" x 1.5"

6. Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

see Exhibit A attached.

7a. Marketing Staff

What staff positions are/will be responsible for affirmative marketing?

Gayle C. Tiber, Sr. Property Manager

7b. Staff Training and Assessment: AFHMP

(1) Has staff been trained on the AFHMP?

(2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?

(3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?

Gayle C. Tiber, Sr. Property Manager. Training is provided semi-annually an on as-needed basis.

(4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?

(5) If yes, how and how often?

semi-annually.

7c. Tenant Selection Training/Staff

(1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?

(2) What staff positions are/will be responsible for tenant selection?

Gayle C. Tiber, Sr. Property Manager

7d. Staff Instruction/Training:

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

See Exhibits B1 and B2 attached.

8. Additional Considerations Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

See Exhibit C attached.

9. Review and Update

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

Robert M. Pascucci

JANUARY 23, 2012

Name (type or print)

Robert M. Pascucci

Title & Name of Company

General Partner, Roslyn Plaza Housing Association

For HUD-Office of Housing Use Only

Reviewing Official:

[Signature] 2/1/12

Signature & Date (mm/dd/yyyy)

Name
(type
or
print)

Diane Lima

Title

DIRECTOR, PROJECT MANAGEMENT
NY-MULTIFAMILY HUB

For HUD-Office of Fair Housing and Equal Opportunity Use Only

☒ Approval

☐ Disapproval

[Signature] 4/5/12

Signature & Date (mm/dd/yyyy)

Name
(type
or
print)

[Signature]

Title

Compliance Branch Chief

Public reporting burden for this collection of information is estimated to average six (6) hours per initial response, and four (4) hours for updated plans, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

Purpose of Form: All applicants for participation in FHA subsidized and unsubsidized multifamily housing programs with five or more units (see 24 CFR 200.615) must complete this Affirmative Fair Housing Marketing Plan (AFHMP) Form as specified in 24 CFR 200.625, and in accordance with the requirements in 24 CFR 200.620. The purpose of the AFHMP is to help applicants achieve a condition in which individuals of similar income levels in the same housing market area have a like range of housing choices available to them regardless of their race, color, national origin, religion, sex, disability, or familial status. The AFHMP helps owners/agents (respondents) effectively market the availability of housing opportunities to individuals of both minority and non-minority groups that are least likely to apply for occupancy.

An AFHM program, as specified in this Plan, shall be in effect for each multifamily project throughout the life of the mortgage (24 CFR 200.620(a)). The AFHMP, once approved by HUD, must be available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without HUD approval. This form contains no questions of a confidential nature.

Applicability: The form and worksheets must be completed and submitted by all FHA subsidized and unsubsidized multifamily housing program applicants.

INSTRUCTIONS

Send completed form and worksheets to your local HUD Office, attention: Director, Office of Housing.

Part 1- Applicant/Respondent and Project Identification. Blocks 1a, 1b, 1c, 1g, 1h, and 1i are self-explanatory.

Block 1d – Respondents may obtain the Census tract number from a local planning office, Community Development Block Grant Consolidated Plan, or another official source such as the U.S. Census Bureau (www.census.gov).

Block 1e - Respondents should identify the housing market area/expanded housing market area for their multifamily housing projects. A **housing market area** is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants.

If a housing market area is not demographically diverse in terms of race, color, national origin, religion, sex, disability, or familial status, an expanded housing market area may be used. An **expanded housing market area** is a larger geographic area that may provide additional diversity. Respondents should indicate the housing or expanded housing market area in which the housing is/will be located, e.g., "City of _____" for housing market area, or "City of _____" and "County of _____" for expanded housing market area.

Block 1f - The applicant should complete this Block only if a Managing Agent (the agent cannot be the applicant) is implementing the AFHMP.

Part 2-Type of AFHMP

Block 2a – Respondents should indicate the status of the AFHMP, i.e., initial or updated, as well as the date of the first approved AFHMP. Respondents should also provide the reason(s) for the current update, whether the update is based on the five-year review or due to significant changes in project or local demographics. (See instructions for Part 9).

Block 2b – Respondents should identify all groups HUD has approved for occupancy in the subject project, in accordance with the contract, grant, etc.

Block 2c – Respondents should specify the date the project was/will be first occupied.

Block 2d – For new construction and substantial rehabilitation projects, advertising must begin at least 90 days prior to initial occupancy. In the case of existing projects, respondents should indicate whether the advertising will be used to fill existing vacancies, to place individuals on the project's waiting list, or to re-open a closed waiting list. Please indicate how many people are on the waiting list when advertising begins.

Part 3 Demographics and Marketing Area.

"Least likely to apply" means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.

Block 3a - Using Worksheet 1, the respondent should indicate the demographic composition of the project's residents, current project applicant data, census tract, and housing market area. The respondent compares the demographics of these sources of information to determine if there needs to be affirmative marketing to those least likely to apply in the housing market area. If the housing market area is not demographically diverse in terms of race, color, national origin, religion, sex, disability, or familial status, an expanded housing market area should be designated to enhance the diversity of individuals applying for housing opportunities. The applicable housing market area or expanded housing market area should be shown in Block 1e. Wherever possible, demographic statistics should be obtained from a local planning office, Community Development Block Grant Consolidated Plan or another governmental source. Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area, i.e., those group(s) "least likely to apply" for the housing without targeted outreach and marketing. If there is a particular group or subgroup with members of a protected class that has an identifiable presence in the housing market area, but is not included in Worksheet 1, please specify under "Other."

Block 3b - Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts by checking all that apply.

Part 4 - Marketing Program and Residency Preference (if any).

Block 4a - A residency preference is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). Respondents should indicate whether a residency preference is being utilized, and if so, respondents should specify if it is new, revised, or continuing. If a respondent wishes to utilize a residency preference, it must state the preference area (and provide a map delineating the precise area) and state the reason for having such a preference. The respondent must ensure that the preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a) (see 24 CFR 5.655(c)(1)).

Respondents should use Worksheet 2 to show how the percentage of the eligible population living or working in the residency preference area compares to that of the occupancy of the project, project applicant data, census tract, and housing market area. The percentages would be the same as those shown on completed Worksheet 1.

Block 4b - Using Worksheet 3, respondents should describe their use of community contacts to help market the project to those least likely to apply. This table should include the name of a contact person, his/her address, telephone number, previous experience working with the target population(s), the approximate date contact was/will be initiated, and the specific role the community contact will play in assisting with affirmative fair housing marketing or outreach.

Block 4c - Using Worksheet 4, respondents should describe their proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, the reason for choosing this media, and the language of the advertisement. Alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size) should be described.

Please attach a copy of the advertising or marketing material.

Part 5 - Availability of the Fair Housing Poster, AFHMP, and Project Site Sign.

Block 5a - The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Respondents should indicate all locations where the Fair Housing Poster will be displayed.

Block 5b - The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check all of the locations where the AFHMP will be available.

Block 5c - The Project Site Sign must display in a conspicuous position the HUD-approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Respondents should indicate where the Project Site Sign will be displayed, as well as the size of the Sign and the size of the logo, slogan, or statement. **Please submit photographs of project site signs.**

Part 6 - Evaluation of Marketing Activities.

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those individuals identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the evaluations.

Part 7- Marketing Staff and Training.

Block 7a - Respondents should identify staff positions that are/will be responsible for affirmative marketing.

Block 7b - Respondents should indicate whether staff has been trained on the AFHMP and Fair Housing Act. Please indicate who provides the training and how frequently. In addition, respondents should specify whether they periodically assess staff members' skills in using the AFHMP and in applying the Fair Housing Act. They should state how often they assess employee skills and how they conduct the assessment.

Block 7c - Respondents should indicate whether staff has been trained on tenant selection in accordance with the project's occupancy policy, including residency preferences (if any). Respondents should also identify those staff positions that are/will be responsible for tenant selection.

Block 7d - Respondents should include copies of any written materials related to staff training, and identify the dates of past and anticipated training.

Part 8 - Additional Considerations.

Respondents should describe their efforts not previously mentioned that were/are planned to attract those individual least likely to apply for the subject housing.

Part 9 - Review and Update.

By signing the respondent assumes responsibility for implementing the AFHMP. Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, national origin, religion, persons with disabilities, and/or large families. The respondent will then determine if the population least to likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The revised AFHMP must be submitted to HUD for approval. HUD may review whether the affirmative marketing is actually being performed in accordance with the AFHMP. If based on their review, respondents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required. HUD may review this documentation.

Notification of Intent to Begin Marketing for Initial Occupancy. No later than 90 days prior to the initiation of rental marketing activities, the respondent with an approved AFHMP must submit notification of intent to begin marketing. The notification is required by the AFHMP Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, the monitoring office will review any previously approved plan and may schedule a pre-occupancy conference. Such conference will be held prior to initiation of sales/rental marketing activities. At this conference, the previously approved AFHMP will be reviewed with the applicant to determine if the plan, and/or its proposed implementation, requires modification prior to initiation of marketing in order to achieve the objectives of the AFHM regulation and the plan.

OMB approval of the AFHMP includes approval of this notification procedure as part of the AFHMP. The burden hours for such notification are included in the total designated for this AFHMP form.

Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities
(See AFHMP, Block 3b)

In the respective columns below, indicate the percentage of demographic groups among the project's residents, current project applicant data, census tract, housing market area, and if applicable, expanded housing market area (if necessary to conduct marketing to reach a more diverse housing market area in terms of race, color, national origin, religion, sex, disability, or familial status). Wherever possible, please use statistics from a local planning office, Community Development Block Grant Consolidated Plan, or another official source such as the U.S. Census Bureau, <http://factfinder.census.gov>, click on factfinder2.census.gov; to find information about demographics in a certain state: click 2010 Census Summary File 1 (at the top of the page). If data is not available for your state, please use the 2005-2009 American Community Survey (ACS) data (see <http://www.census.gov/acs/www/>).

If there is significant under-representation of any demographic group among project residents or current applicants in relation to the housing/expanded housing market area, then targeted outreach and marketing should be directed toward these individuals least likely to apply, and these individuals should be indicated in Block 3b of the AFHMP. See Part 3 of the instructions for further guidance. **Please attach maps showing both the housing market area, and the expanded housing market area if applicable.**

Demographic Characteristics	Project's Residents %	Project Applicant Data%	Census Tract %	Housing Market Area %	Expanded Housing Market Area% (if used)
White	9.3	2.0	54.52	65.49	
American Indian or Alaskan Native	0	0	0.39	0.10	
Asian	2.0	0	19.70	7.58	
Black or African American	76.5	92.0	10.6	10.55	
Native Hawaiian or Other Pacific Islander	0%	0%	0%	0.01	
Hispanic or Latino	12.2	2.0	12.15	14.58	
Persons with Disabilities	28.6	22.22	20	15	
Families with Children	27.2	77.77	15	11	
Other (specify)	2.0	4.0	0.21	0.35	

Worksheet 2: Establishing a Residency Preference Area (See AFHMP, Block 4a)

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area compares to the demographics of the project's residents, applicant data, census tract, and housing market area. **Please attach a map clearly delineating the residency preference geographical area.**

Demographic Characteristics	Project's Residents % (as determined in Worksheet 1)	Project's Applicant Data % (as determined in Worksheet 1)	Census Tract % (as determined in Worksheet 1)	Housing Market Area % (as determined in Worksheet 1)	Expanded Housing Market Area % (if needed and as determined in Worksheet 1)	Residency Preference Area % (if applicable)
White						
American Indian or Alaskan Native						
Asian						
Black or African American						
Native Hawaiian or Other Pacific Islander						
Hispanic or Latino						
Persons with Disabilities						
Families with Children						
Other (specify)						

NO RESIDENCY PREFERENCE AT ROSLYN PLAZA GARDENS. THIS PAGE IS NOT APPLICABLE.

Worksheet 3: Proposed Marketing Activities –Community Contacts (See AFHMP, Block 4b)

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the particular population group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses, their telephone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing. Please attach additional pages if necessary.

Targeted Population(s)	Community Contact(s), including required information noted above.
White	New York Irish Center, 1040 Jackson City, Long Island, New York 11101, 718 482-0909, Colin Campbell, President
Amerian Indian or Alaskan Native	American Indian Community House, 11 Broadway, 2nd Fl. NY, NY, 10004, 212 598-0100, Buddy Gwin, Executive Director
Asian	Asian American Federation, 120 Wall Street, 3rd Floor, NY, NY, 10005, 212 344-5878 Cao K.O. Director
Native Hawaiian or Other Pacific Islander	National Coalition for Asian-Pacific Americans, 305 7th Ave. NY, NY, 212 822-9567 Aleamma Matthew, Director
Hispanic/Latino	NERVE, Mr. Roberto Anazagasti, Director, 18 East 116th Street, New York, NY 10029, 212 427-0555

Each of the above organizations has vast experience in working with the targeted populations. Contact with these groups will be initiated by phone and by letter. Each organization will assist with the Affirmative Fair Housing Marketing Program designed for the project by conducting outreach to its members to inform them of apartment availability.

Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHMP, Block 4c)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use, as applicable to that group and the reason for choosing this media. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.) state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g. Braille, large print, etc.), and specify the logo(s) (as well as size) that will appear on the various materials. Attach additional pages, if necessary, for further explanation. Please attach a copy of the advertising or marketing material.

Targeted Population(s)→ Methods of Advertising ↓	Targeted Population:	Targeted Population:	Targeted Population:
Newspaper(s)	White - Irish Echo, weekly newspaper 2 weeks, 1 col. x 4"	American Indian - Indian Country Today, weekly newspaper 2 weeks 1 col x 4"	Asian - The World Journal weekly newspaper, 2 weeks 1 col. x 4"
Radio Station(s)	Native Hawaiian, Filipino Reporter, daily newspaper 1 full week, 1 col. x 4"	Hispanic/Latino, Eldiario, daily newspaper, 1 full week, 1 col. x 4"	
TV Station(s)			
Electronic Media			
Bulletin Boards			
Brochures, Notices, Flyers			
Other (specify)			

The ad material will be provided in English and the language in which the newspaper is printed. The size of the logo in newspaper ads is approximately 1/2 inch.



**JMI MANAGEMENT COMPANY INC.
277 NORTHERN BOULEVARD
GREAT NECK, NY 11021**

**TELEPHONE: 516-487-0041
FACSIMILE: 516-487-0014**

Exhibit A

HUD-935.2A, Part 6 - Evaluation of Marketing Activities Roslyn Plaza Gardens, Project No. 012-35206; Contract No. NY36-H108-023

The O/A has adopted a marketing effort designed to attract a broad cross-section of the eligible population without regard to race, color, religion, sex, disability, familial status or national origin.

Advertising will be carried out in accordance with the project's HUD-approved Affirmative Fair Housing Marketing Plan. All advertising will include the HUD-approved Equal Housing Opportunity logo, slogan or statement.

The purpose of the plan is to ensure that eligible families of similar income levels will have a similar range of housing opportunities.

The plan outlines marketing strategies the owner will use, including special efforts to attract persons who are least likely to apply because of racial and ethnic composition of the neighborhood in which the property is located.

Marketing will also seek to reach potential applicants outside the immediate neighborhood if marketing only within the neighborhood creates a disparate impact against certain classes.

The O/A will comply with the Income targeting requirements described in the project's Tenant Selection Plan in order to attract applicants with incomes at or below the extremely low-income limit.

The O/A will monitor the results of the marketing effort annually, and adjust marketing techniques as necessary. The AFHMP will be reviewed every five years and updated as needed to ensure compliance with 24 CFR 200.620. If the population of the project and/or property area has changed over time, the targeted marketing efforts will change accordingly.

Based on a review of the demographics of the project and the project area, the O/A will determine whether advertising efforts should be targeted to different groups.

In addition, when reviewing and updating the plan, the O/A will determine whether the advertising sources still exist and whether advertising sources used in the past should be changed or expanded.

In order to determine if marketing activities have been successful in attracting those groups identified as least likely to apply, the O/A will develop an evaluation process to identify and correct any recognizable impediments that affect achieving the desired results in the following manner:

- Conduct an analysis to identify impediments to fair housing choice within the project;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis;
- Maintain records reflecting the analysis and actions taken.

The O/A will make decisions about future marketing activities based on these evaluations.



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Exhibit B (1)

HUD Form 935.2A (7d) Staff Training

Roslyn Plaza Gardens, Project No. 012-35206; Contract No. NY36-H108-023

Roslyn Plaza Gardens complies with all Federal, State and local fair housing and civil rights laws and with all Equal Opportunity requirements in HUD administrative procedures. In carrying out its marketing program and resident selection process, neither the Owner, nor its Agents, will discriminate based on race, color, religion, sex, national or ethnic origin, handicap, familial status, or any other basis prohibited by law. This applies to accepting and processing applications, selecting tenants from among eligible applicants of the waiting list, assigning units, and certifying and re-certifying eligibility for assistance.

All persons who will be handling and/or processing rental applications will be trained in procedures and policy matters, mindful of relevant federal, state and municipal orders, laws and statutes dealing with civil rights and fair housing, this Marketing Plan, applicable regulations governing the selection of applicants for housing, including, but not limited to: Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988; Title VI of the Civil Rights Act of 1964; Executive Order 11063, November 29, 1962; The American with Disabilities Act, Section 504 of The Rehabilitation Act of 1973, and comparable orders on the state level. Marketing staff and all other persons involved in processing and/or handling of potential applications will be familiarized with the above regulations. Also, the appropriate appeal procedures will be explained so that applicants may exercise their rights if they feel discrimination has occurred. Marketing staff will receive training on the use and appropriate review of the paperwork and processing required in marketing the units.

The O/A will use consistent staffing and provide step-by-step instructions to help ensure consistency. Whenever possible, standard forms will be used to document fair practices and to increase the likelihood that each applicant will receive the same consideration.

In order to keep informed of HUD policy, procedures and occupancy requirements, staff attends workshops and training seminars offered by HUD, Quadel Consulting Corporation, and Hixon Training.

Staff persons trained include Gayle C. Tiber, Sr. Property Manager and Maria Tappeto who holds an AHM, and LIHTC training with a C3P. Staff has attended EIV training by Hixon on 6/25/2010.

AFHMP Training

In-house training with regard to Affirmative Fair Housing Marketing is provided to the occupancy staff twice per year and on an on-needed basis. All queries regarding applications and status on the waiting list are directed to the occupancy department.

Each staff member is provided with a copy of the AFHMP Instructions and is required to sign a copy of the instructions stating that he/she has read and understands these instructions.

The signed copy is then placed in the occupancy department's fair housing file for future reference.



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Exhibit B (2)

HUD Form 935.2A (7d) - Example of Written Material Related to Staff Training
Roslyn Plaza Gardens, Project No. 012-35206; Contract No. NY36-H108-023

To: All Employees

From: Gayle C. Tiber, Sr. Property Manager

Date: _____

Subject: Instructions for complying with Local, State and Federal Fair Housing Laws
Regarding the Rental of Housing Units.

"Affirmative marketing" is defined as (1) adherence to local, state and federal fair housing laws, and (2) positive efforts to ensure that a wide spectrum of persons from various races, colors, religions, genders, handicaps, national origins and familial statuses are made aware of our housing developments and their benefits.

It is the policy of this management company to ensure that all fair housing laws are observed by those who participate in the management and operation of our housing developments. Failure to comply with affirmative marketing provisions will subject you and me to sanctions authorized by law.

In the marketing of units, this management company will adhere to the three following specific conditions:

1. All advertising, brochures, leaflets and other printed materials shall include the Equal Housing Opportunity Logo, statement or slogan.
2. All signs, off-site or on-site, will prominently display the logo, statement or slogan.
3. A fair housing poster will be displayed so as to be readily apparent to all persons seeking housing accommodations.

No applicant shall be refused the right to apply for housing. In the selection of residents, this management company will adhere to all regulations relating to fair housing. Our developments will be managed and operated without regard to race, color, religion, sex, national origin, familial status, disability, or as required by state law, without regard to creed, ancestry, sexual preference, or source of income.

- In the performance of your duties, you must carry out an affirmative fair housing program in accordance with civil rights laws which prohibit discrimination against applicants or residents based on race, color, sex, national origin, age, disability, religion and familial status.
- Marketing of multi-family housing by this management company, at a minimum, shall be in accordance with the Owner's HUD-approved Affirmative Fair Housing Marketing Plan and their signed assurance of compliance with civil rights laws regarding fair housing and program accessibility, and with HUD notices explaining these requirements. Applicable federal laws include the following: 24 CFR, part 1 Title VI of the Civil Rights Act of 1964, 24 CFR, part 8, Section 504 of the Rehabilitation Act of 1973, 24 CFR, part 100 et seq Fair Housing Act, Fair Housing Act, Title VII of the Civil Rights Act of 1968, 24 CFR, part

146 Age Discrimination Act of 1975, and 24 CFR 200.600 Affirmative Fair Marketing Regulations.

- You must also be familiar with local and/or state laws that prohibit discrimination based upon membership in other classes, e.g., marital status or sexual orientation.
- A copy of the HUD 4350.3 REV 1, Occupancy Handbook, including changes 2 & 3, is required to be maintained on site at all times and you must use this guide on a day-to-day basis. You are expected to be familiar with and to comply with the rules contained in Chapter 2, Civil Rights and Non-Discrimination Section of the handbook.
- For example, you must not take any of the actions listed below based on race, color, religion, sex, disability, familial status or national origin:
 1. Deny anyone the opportunity to apply for housing suitable to his or her needs;
 2. Provide anyone housing that is different from that provided to others;
 3. Subject anyone to segregation, even if by floor or wing;
 4. Restrict anyone's access to any benefit enjoyed by others in connection with the housing program;
 5. Treat anyone differently in determining eligibility or other requirements for admission, in use of the housing amenities, facilities or programs, or in the terms and conditions of a lease;
 6. Deny anyone access to the same level of services;
 7. Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program;
 8. Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons;
 9. Discriminate against someone because of that person's relation to or association with another individual; or
 10. Retaliate against, threaten, or act in any manner to intimidate someone because he or she has exercised rights under the Fair Housing Act.
- You must be aware that there are certain limited circumstances when the Act requires that we treat persons with disabilities differently to enable them to have equal access to, or enjoyment of, housing and other housing-related programs. Under those circumstances, the Fair Housing Act requires us to provide "reasonable accommodations" to persons with disabilities. This means that we may have to modify rules, policies, practices, procedures and/or services to afford a person with a disability an equal opportunity to use and enjoy the housing.

From time to time, as fair housing laws are amended, this management company will revise and update its instructions to keep all employees current with any applicable equal housing opportunity regulations.

Employee's Signature:

Date:



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Exhibit C

HUD-935.2A, Part 8,
Additional Considerations
Roslyn Plaza Gardens, Project No. 012-35206; Contract No. NY36-H108-023

The O/A is committed to affirmatively further fair housing based on the Fair Housing Act based on the following objectives:

- Analyze and eliminate housing discrimination in the project;
- Promote fair housing choice for all persons;
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin;
- Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities;
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.
- Maintain a relationship and on-going contact with resources and services in the community for persons with disabilities in an effort to stay informed of activities and services that are available to the disabled population residents at Roslyn Plaza Gardens.
- Conduct outreach to resources available in the community which provide social and sport activities for resident families with children.

ADDENDUM TO AFFIRMATIVE FAIR HOUSING MARKETING PLAN

NASSAU COUNTY INDUSTRIAL DEVELOPMENT AGENCY

The following shall serve as an addendum to the Affirmative Fair Housing Marketing Plan ("Plan") to which this Addendum is attached.

"Agency" means the Nassau County Industrial Development Agency.

"Applicant" means Roslyn Plaza Housing Associates, L.P.

"Project" means Roslyn Plaza Gardens, Roslyn Heights, N.Y.

1. There are 103 affordable units to be marketed for rent.
2. There are no market rate units in the Project.
3. The Project is not "housing for older persons."
4. The medium of marketing the units are set forth in Worksheet 4 attached hereto.
5. The Applicant will use fair housing logo or phrase "Equal Housing Opportunity" on all advertising.
6. The Applicant will distribute written information regarding the affordability of available units to the list of organizations provided by the Agency.
7. The Applicant will conduct the marketing itself.
8. The Applicant will maintain records of the activities it undertakes to implement this Plan.