

# **EXHIBIT R**



Stephanie Rudolph &lt;srudolph@communitiesresist.org&gt;

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## 70 South Elliott --Requests regarding Cameras and Unnoticed Visits

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Stephanie Rudolph <srudolph@communitiesresist.org>  
To: Jonathan Schreier <JSchreier@borahgoldstein.com>  
Cc: Adam Meyers <ameyers@communitiesresist.org>

Mon, Sep 14, 2020 at 12:37 PM

Thank you for responding. I will be guided accordingly.

On Mon, Sep 14, 2020 at 12:35 PM Jonathan Schreier <JSchreier@borahgoldstein.com> wrote:

I spoke to my client. At this point my client will not be removing or disabling the cameras. As I will remind you, my client had to install the cameras in the first place because your clients were falsely accusing my client of harassment.

Without getting into too many of the specific allegations you have listed, I will point you to this video on your client's public website (<https://sonnysingh.com/>) where he intentionally reveals his hair for all to see. Understandably, my client is therefore suspect of Mr. Singh's claim that the owner seeing him with his hair uncovered makes him uncomfortable.

Perhaps your clients forget that this is an SRO. Each of the tenants have complete and exclusive control of their single rooms, and my client does not interfere with that, or have any cameras in their rooms. The common areas are just that, common to the tenants and the landlord. Not only is my client permitted to keep cameras in the common areas for security purposes (both for my client's own security, for my client's ability to have proof that your client's are improperly causing HPD violations to be placed, and so that the blatant vandalism engaged in by certain occupants can be memorialized), my client is fully permitted to utilize the common areas. If my client wanted to start preparing dinner at the common kitchen at 70 South Elliott every night, my position is that my client would be fully permitted to do so. Therefore, my client is not obligated to give advance notice before coming to the house, the same as Sonny Singh is not obligated to give Lucas Shapiro notice when he is coming to the house.

As to the mail, my client receives mail at the Premises. My client is authorized to retrieve mail from the premises. The same way that my client may inadvertently pick up (and immediately put back down) one of the tenant's pieces of mail, I am sure your clients pick up my client's mail inadvertently from time to time.

My client is operating completely within the law. If you believe my client is violating any provision of the law, please provide me the citation and I will discuss it with my client.

Jonathan B. Schreier, Esq.,

Partner

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**From:** Stephanie Rudolph <[srudolph@communitiesresist.org](mailto:srudolph@communitiesresist.org)>  
**Sent:** Sunday, September 13, 2020 5:08 PM  
**To:** Jonathan Schreier <[JSchreier@borahgoldstein.com](mailto:JSchreier@borahgoldstein.com)>  
**Cc:** Adam Meyers <[ameyers@communitiesresist.org](mailto:ameyers@communitiesresist.org)>  
**Subject:** 70 South Elliott --Requests regarding Cameras and Unnoticed Visits

Dear Jonathan:

Although we have not reached an agreement about the lock out, I am writing to see if we can come to an agreement regarding the cameras at the premises and the lack of notice your clients and your clients' agents provide my clients before entering the premises.

While I believe a former counsel for the tenants raised concern with the owner's prior counsel back in May, I wanted to also let you know that:

- 1) **My clients object to the interior cameras and ask that they be removed or disabled immediately.**
- 2) **My clients also object to the unannounced visits by purported agents of Judith, which often happen after hours or on Sundays.**

In addition to feeling like these interior cameras and unannounced visits are tools for harassment, several residents have concerns based on their protected characteristics.

**Religion:** As you may be aware, one of the long-term residents is a religious and observant Sikh. He wears a turban and has a beard. It is extremely uncomfortable and embarrassing for him to be seen on camera with his hair down and uncovered while he's drying it (which he does in the common areas of the home and on his way from the bathroom to his room). Because agents of the owner walk in unannounced, he also worries about them coming and seeing him with his hair uncovered. Here is some information for your client's review regarding the Sikh religion and the turban: [https://www.worldsikh.org/what\\_is\\_the\\_significance\\_of\\_the\\_turban](https://www.worldsikh.org/what_is_the_significance_of_the_turban)

**Gender/Sex:** As you are also aware, half the residents are female identified and/or female bodied. They find the cameras, which appear to capture images of them going to and from the bathrooms, to be embarrassing and a form of

gender based harassment. We understand that Samuel Grunbaum, who purports to be the son of Judith, is the one viewing the tapes (as he discusses their content with my clients).

Further, the women and female-bodied people do not feel comfortable having male agents of the owner showing up in the house unannounced. It is extremely startling for them to see a strange man and/or Samuel Grunbaum (who has been aggressive to them in the past) walking around the house without knocking or asking for permission to enter. Because Samuel and his agents will come after 5pm and on weekends, they must keep their guard up at all times.

Finally, due to the Covid-19 pandemic, my clients need to have a mask on them at all times, even on the weekend and at night, in case an agent of the owner lets himself into the premises without notice.

**Please advise:**

- 1) As to whether your client is willing to disable and/or remove the interior cameras?
  
- 2) As to whether your client will agree to providing reasonable notice before entering the premises (and not to let agents in unannounced) unless it is an emergency dangerous to the health, life and safety of the residents? Further, we ask that the reason for the visit be announced in advance. On a related note, we ask that your client stop going through my clients' mail area and taking photos of their mail.

Sincerely,

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**Stephanie R. Rudolph** | Director of Fair Housing & Supervising Attorney

*Pronouns: they/them*

Communities Resist - A Project of Southside United HDFC

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