

July 5, 2019

Regulations Division  
Office of the General Counsel  
Department of Housing and Urban Development  
451 7th Street, SW, Room 10276  
Washington, DC 20410-0500

**RE: [Docket No. FR-6124-P-01] Housing and Community Development Act of 1980:  
Verification of Eligible Status 1**

To Whom It May Concern:

Brinshore Development is a for profit developer of affordable housing based in Northbrook, Illinois. We have partnered with two dozen housing authorities to redevelop public housing portfolios. We are either partners in ownership, or owner outright of approximately 2,000 public housing units. HUD's proposed rule change impacting the public housing eligibility of mixed families (including citizens and non-citizens in a single household) concerns us. As a member of NAHRO, Brinshore agrees with the comments submitted by Tushar Gurjal of NAHRO, on policy grounds.

But In addition to the concerns raised in his letter, I am personally concerned with this proposed policy on humanitarian grounds. Forcing our households to make the ghoulish choice between separating their family or losing the only housing they can afford does not fit with American values, at least not the America I believe has existed up until this moment. In good conscience, I cannot sit idly by at a moment like this where I feel the federal government is moving down a dangerous track.

As a Jew who lost many member of my immediate family in the Holocaust, this proposed rule rings a very troubling chord. In 1935, the German Government passed two laws: the Law for the Protection of German Blood and German Honour, which forbade marriages and extramarital intercourse between Jews and Germans and the employment of German females under 45 in Jewish households; and the Reich Citizenship Law, which declared that only those of German or related blood were eligible to be Reich citizens; the remainder were classed as state subjects, without citizenship rights.

While HUD's proposed rule is a long way from the racist and anti-semitic Nuremberg Laws, they both force a horrible choice: breakup of the family or live outside the protection of law. They both create an "other" that is less deserving of protection than the "citizen." In the case of Germany, we all know where the logical conclusion of this argument led.

Non-citizens in mixed households are not subsidized currently, and non-citizens are not permitted to lease public housing units on their own, so this rule is not necessary to preserve resources for citizens. It appears that this proposed rule is a solution in search of a problem. It is not for me to say whether the motivation of the federal government to pass this current proposed rule is racist, but the impact on

those forced to make this choice will certainly feel that it was. Thankfully we still have a country with free speech allowing me to express this view that this misguided proposed rule is beneath us, and should be rescinded.

Please reconsider this dangerous rule, and focus on increasing affordable housing options for all who live in our great country. Affordable housing is not a zero sum game, and we can all work together to house all those who need shelter.

Very truly yours,

A handwritten signature in blue ink that reads "Peter Levavi". The signature is written in a cursive style with a large initial "P" and a small mark at the end of the name.

Peter Levavi  
Senior Vice President