

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

RHODE ISLAND HOMELESS
ADVOCACY PROJECT, et al.

v.

GINA RAIMONDO, et al.

C.A. No. 17-

DECLARATION OF KAREN A. SANTILLI

I, Karen A. Santilli, hereby make the following declaration that:

1. I am the President and chief executive officer of Crossroads Rhode Island.
2. Crossroads Rhode Island is a non-profit organization whose mission is to help homeless or at-risk individuals and families secure stable homes.
3. Crossroads Rhode Island is currently contracted with the State of Rhode Island with operating the Harrington Hall shelter located at 30 Howard Avenue, Cranston, Rhode Island.
4. On any given day, there are a number of registered sex offenders residing at Harrington Hall. These numbers vary on a daily basis and typically exceed 20.
5. Crossroads Rhode Island is not aware of any re-offenses committed in the area of Harrington Hall by registered sex offenders residing in the facility.
6. Due to systemic barriers to housing, such as the 300 foot residency restriction barring sex offenders from residing within 300 feet of schools as well as restrictions on subsidized housing, registered sex offenders in Rhode Island face significant issues both obtaining and maintaining stable housing.

EXHIBIT 1

7. Registered sex offenders also face significant risks of re-incarceration due to inability to comply with registration requirements within their local city or town while homeless.

8. Crossroads Rhode Island is on notice as to the recent enactment of R.I.G.L. § 42-11.2-11(C). This statute, which goes into effect on January 1, 2018, prohibits Harrington Hall from sheltering more than 10% of its housing capacity to registered sex offenders. As a result of R.I.G.L. § 42-11.2-11(C), Harrington Hall cannot shelter more than eleven registered sex offenders. In order to comply with this statute, Harrington Hall has taken steps to house registered sex offenders.

9. Crossroads has been able to move many, but not all, registered sex offenders to other facilities. Most sex offenders exiting the A.C.I. with no housing would likely end up homeless.


10. Where we have not been successful in relocating registered sex offenders to other facilities, clients will stay at Harrington Hall and registered sex offenders that exceed the 10% cap will be turned away.

11. The anticipated homelessness upon registered sex offenders due to the 10% rule going forward is two to six new clients each month will not be allowed shelter at Harrington Hall.

In accordance with 28 U.S.C. §1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on

12/28/17



Karen A. Santilli