

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 SHAWN ROGAN

SHAWN ROGAN, being duly sworn, deposes and says the following under penalty of
perjury:

1. I am Shawn Rogan, the Director of Environmental Health Services at the Putnam County
Department of Health.

2. I have worked for the Department of Health in various capacities for a total of
approximately 27 years with Director of Environmental Health Services being my current role
and title.

3. 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.

4. One of the many functions of my role is participation in the Putnam County Temporary
Residence Program, which requires me to be in communication with Hotels/Motels within the
community for the purpose of ensuring compliance with New York State Sanitary Code.

5. On or about May 15, 2023, the County Executive for Putnam County drafted a letter to
the hotels/motels in our community, identifying me as a contact, and asking that they please

contact me should they be contacted by anyone from NYC seeking temporary housing because due to Putnam County's limited resources, any such plans would require a shared services agreement.

6. Indeed, one such hotel/motel notified that they had been contacted by a third-party business that represented that they were calling on behalf of NYC, and that they were seeking to rent/acquire the entirety of the hotel/motel for a contract period of between 6 months to 5 years at a rate of \$130 dollars per night per room.

7. The hotel/motel explained that they were already almost at capacity and were not interested in this proposition.

8. Putnam County was never contacted regarding this proposition.

9. To date, Putnam County has not received any formal request for placement of any asylum seekers in our County, nor has Putnam County denied or prevented any such request.

10. During my time at the Health Department, and specifically in my current role, I have had personal occasion to observe the lengths to which Putnam County goes to ensure that facilities maintain healthy and sanitary living conditions for patrons.

11. Putnam County's ability to continue doing that depends on measures consistent with responsible government, such as shared services agreements with any other County that wishes to place people seeking asylum in our County.

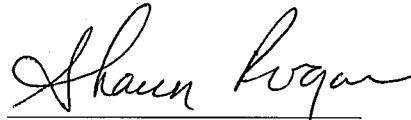
12. By doing so, both Counties ensure that their roles, responsibilities, and contributions are clearly defined, that all of the people being placed are accounted for, and have all of their needs provided for.

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

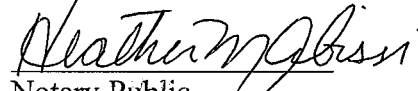
- a. Shawn Rogan
Director of Environmental Health Services

Putnam County Department of Health
1 Geneva Road
Brewster, NY 10509
(845) 808-1390
Shawn.Rogan@putnamcountyny.gov

Date: 6/26/2023


Shawn Rogan
Director

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


Notary Public

HEATHER M. ABISSI
Notary Public - State of New York
No. 02AB6404425
Qualified in Dutchess County
My Commission Expires Feb. 18, 2024