

The Davis Pond Conservancy, INC

January 19, 2017

Supervisor Michael Schiliro and
Honorable Members of the Town Board
Town of North Castle
Town Hall – 15 Bedford Road
Armonk, NY 10504

Re: Paradigm Treatment Centers LLC and 14-16 Cole Drive

Dear Honorable Supervisor Schiliro and Honorable Town Board Members:

As our lawyers, Cuddy & Feder, have pointed out in their January 6, 2017 letter, Paradigm had underhandedly (and unlawfully) launched a website in early 2016 aggressively marketing the proposed Cole Drive facility as a drug and alcohol treatment center. They surreptitiously pulled the plug on their website after we pointed this out and they blamed their 'webmaster' in an attempt to disclaim what their facility is truly intended to be.

Paradigm's facility is unquestionably a Drug and Substance Abuse program for teenagers and they have continued to market it as such on social media up until recently. "Teen Addiction Treatment" and "Drug Abuse Treatment" services are ubiquitous on Paradigm New York's Facebook and Twitter pages, as you will see below.

Up until this week, Paradigm's Facebook page described its services to include "Teen Addiction Treatment" (evidence below dated 1/8/17). Up through the end of December, Paradigm's Twitter page described its services as "Drug Abuse Treatment" and contains a multitude of tweets that pertain to drug abuse/addiction (evidence below dated 01/19/17).

Additionally, as some of you may have noted, an article appeared in the Journal News on Thursday, January 12, 2017. That article states that, "according to Paradigm" – that "out of 228 young people enrolled in Paradigm's program in California last year, 69 teens, or about 30 percent, came from New York state, including Lower Hudson Valley communities such as Bronxville, Chappaqua, Rye, Croton-on-Hudson, Scarsdale, Irvington, Eastchester, Mount Kisco, Mount Vernon, Chestnut Ridge, Montebello and Upper Nyack." But Paradigm's California facility is undeniably a substance abuse program (not even Paradigm denies that). The fact is that Paradigm wants and plans to treat these 69 teens and many other substance abusers at the Cole Drive facility for a substantial profit. It's claim that its New York clients will be treated only for "depression and anxiety" simply lacks credibility. It is also incapable of being policed.

We wanted to share this with you for the record. Since November 30, 2016 Paradigm has made a persistent claims that it will not admit customers with drug and substance abuse issues, yet it has continued to market 14-16 Cole Drive in this way on social media.

We urge the Town Board on January 25th to unanimously object and take every action available to the Town to enjoin Paradigm's unlawful misuse of the Padavan law and its threatened violation of the Town's zoning ordinance.

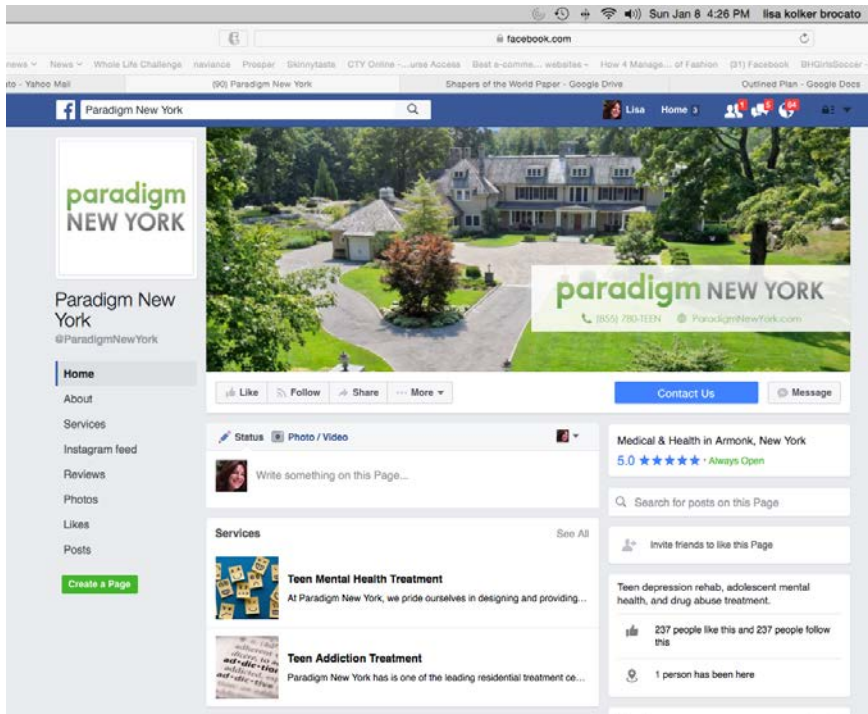
Thank you for your continued consideration.

Respectfully,

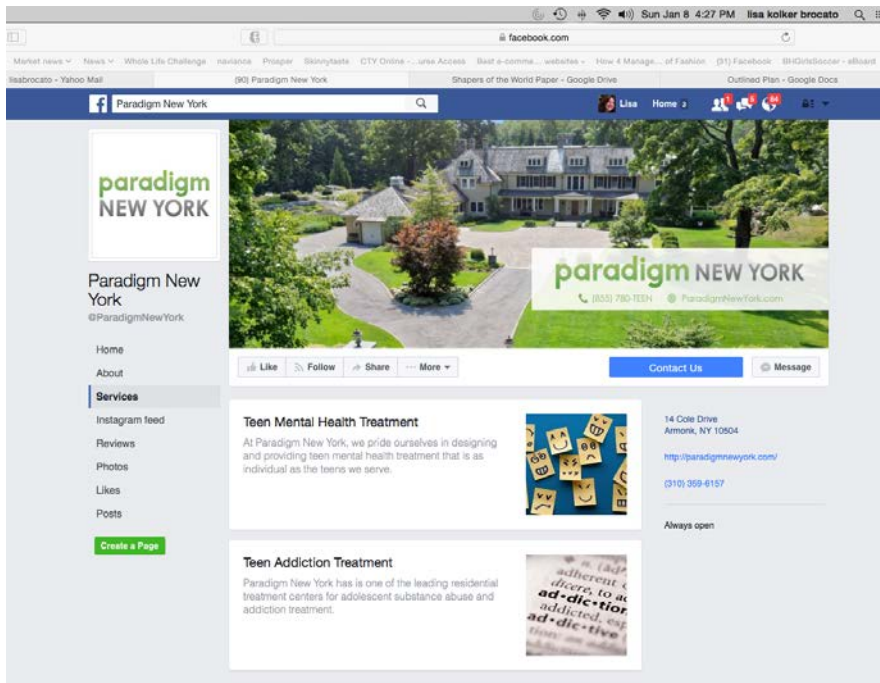
Vivianne Edery-Rattet
Treasurer

Facebook Page as of 1/8/17:

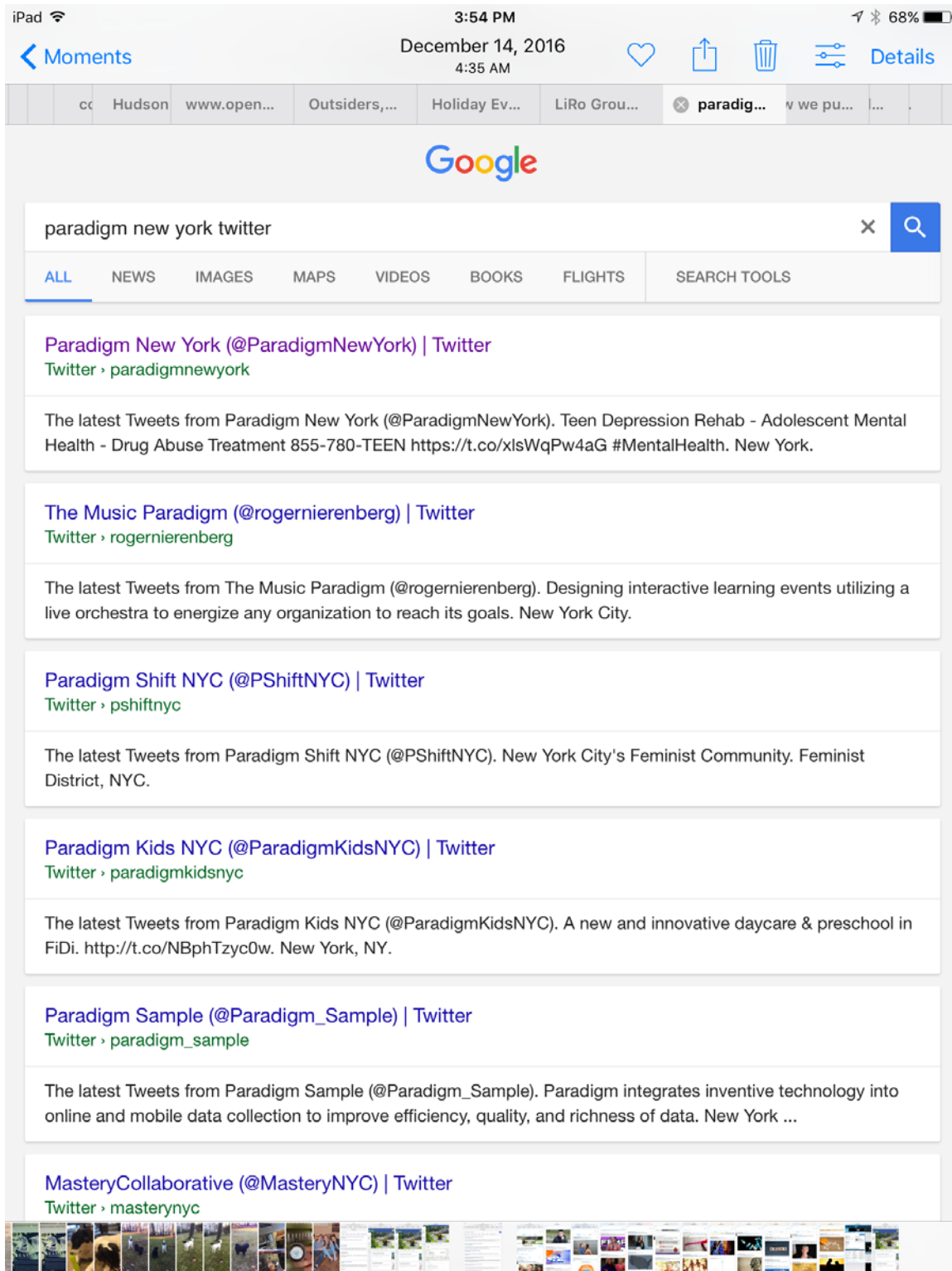
On their home page, they describe 2 services; Teen Mental Health Treatment and **Teen Addiction Treatment**.



And when you click on their Services Page, they list **Teen Addiction Treatment** as 1 of their 2 services...



Google Search for Paradigm Twitter on 12/14/16:
Described as Drug Abuse Treatment



Paradigm NY Twitter Page on 01/19/17

Described as Teen Depression Rehab and Drug Abuse Treatment

The screenshot shows a Safari browser window displaying the Twitter profile of Paradigm New York (@ParadigmNewYork). The browser's address bar shows the Twitter website. The Twitter profile header features a city skyline at night and the text "paradigmNY". Below the header, the profile statistics are listed: 889 Tweets, 301 Following, 427 Followers, and 168 Likes. The bio describes the account as "Teen Depression Rehab - Adolescent Mental Health - Drug Abuse Treatment" and provides contact information. The main content area shows a tweet from Dr. Jeff Nalin (@DrJeffNalin) dated 10 Nov 2016, which is a retweet of a tweet from Paradigm Malibu. The tweet includes a photo of three children. The right sidebar shows a "Who to follow" section with suggestions for Andy Crestodina, Raja Reddy, and World News Tonight. The bottom of the screen shows the macOS dock with various application icons.

Paradigm New York
@ParadigmNewYork
Teen Depression Rehab - Adolescent Mental Health - Drug Abuse Treatment
855-780-TEEN
facebook.com/ParadigmNewYork
#MentalHealth
New York
Joined March 2016
717 Photos and videos

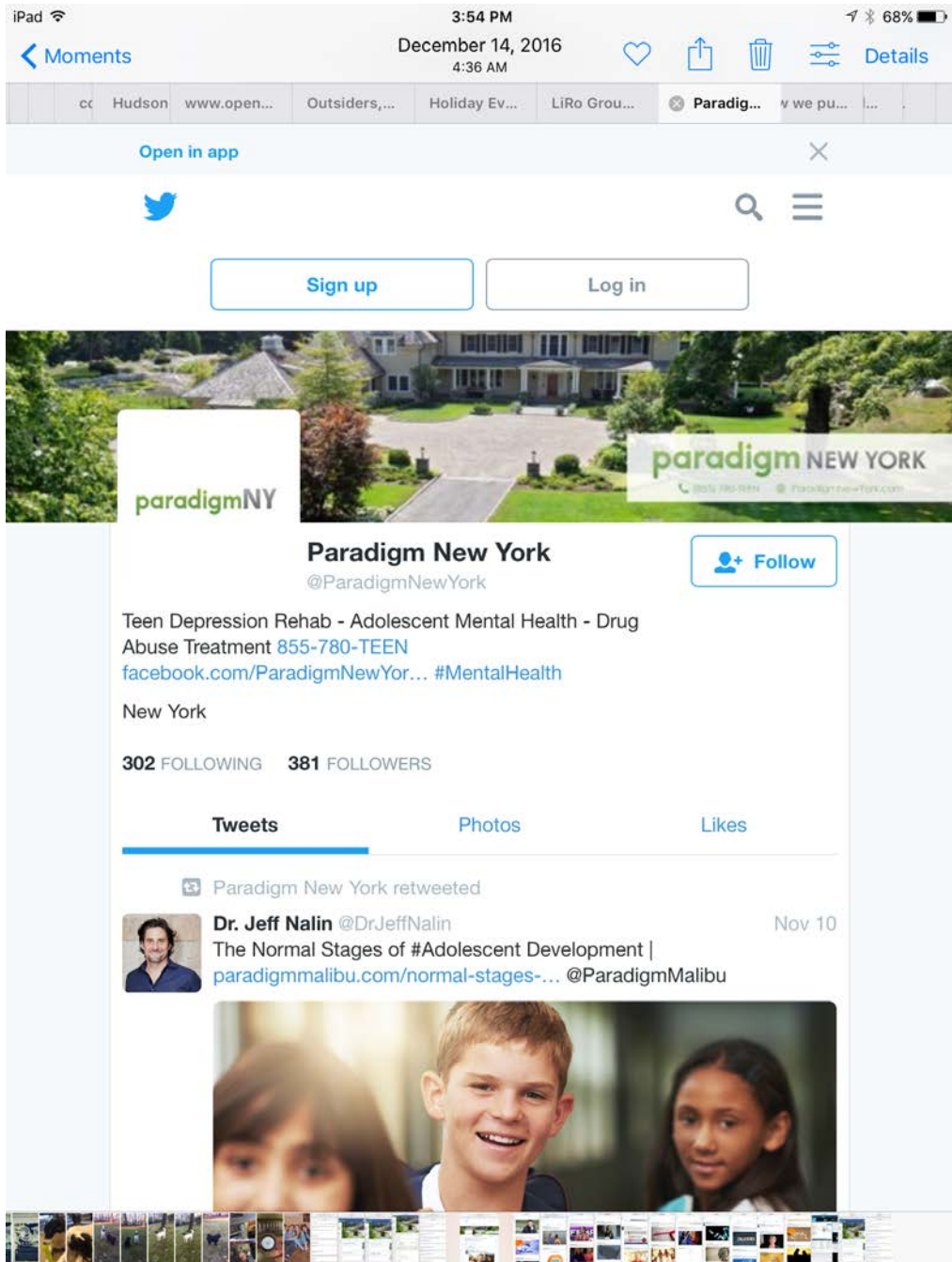
Tweets Tweets & replies Media

Paradigm New York Retweeted
Dr. Jeff Nalin @DrJeffNalin · 10 Nov 2016
The Normal Stages of #Adolescent Development |
paradigmmalibu.com/normal-stages-... @ParadigmMalibu

Who to follow · Refresh · View all

- Andy Crestodina** @crestodina
Followed by Joachim Rodriguez
Follow
- Raja Reddy** @rajareddy_78
Followed by Joachim Rodriguez
Follow
- World News Tonight** @A...
Follow

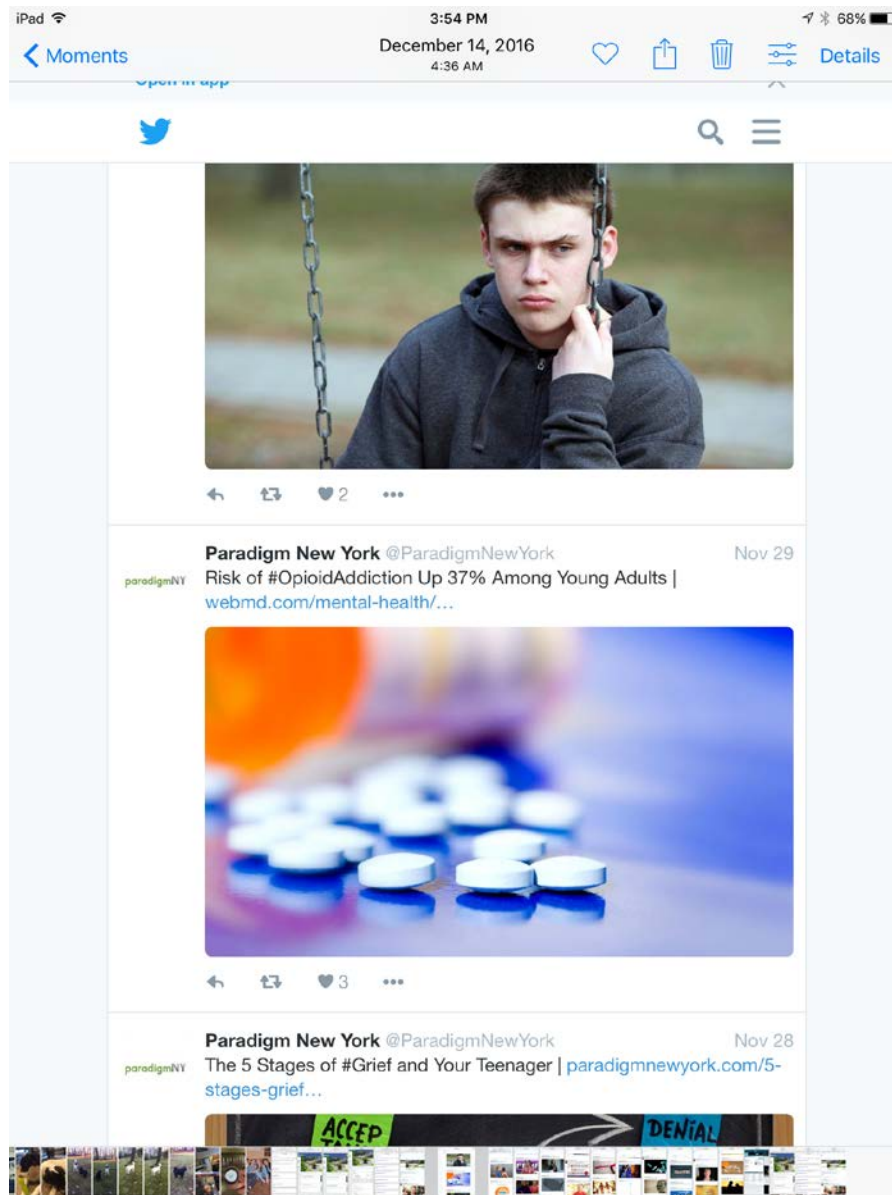
Trends · Change



Paradigm Tweets – Example 1

As you will see from the following pages, Paradigm posted about drug abuse/addiction frequently in November 2016. Below are 10 of their tweets in November, which means that they were posting almost every third day about drug abuse/addiction.

Even after Paradigm filed their application with the Town in mid-November 2016, they continued to tweet about drug abuse and addiction. The tweet below is dated 11/29/16, the day before the first Town Board meeting when they declared that their Webmaster made a mistake.



Paradigm Tweets – Example 2

iPad 3:54 PM 68%

< Moments December 14, 2016 4:37 AM Details


cc Hudson www.open... Outsiders,... Holiday Ev... LiRo Grou... Paradig... v we pu... ...

Open in app

Twitter Search Menu

Sign up Log in


Paradigm New York @ParadigmNewYork Nov 26
paradigmNY How to Support Your #Teen Through #Recovery | paradigmnewyork.com/support-your-t...



Retweet Like 1 More

Paradigm New York @ParadigmNewYork Nov 26
paradigmNY Video: What is #Depression? | morethanmydiagnosis.com/#/what-is-depr...

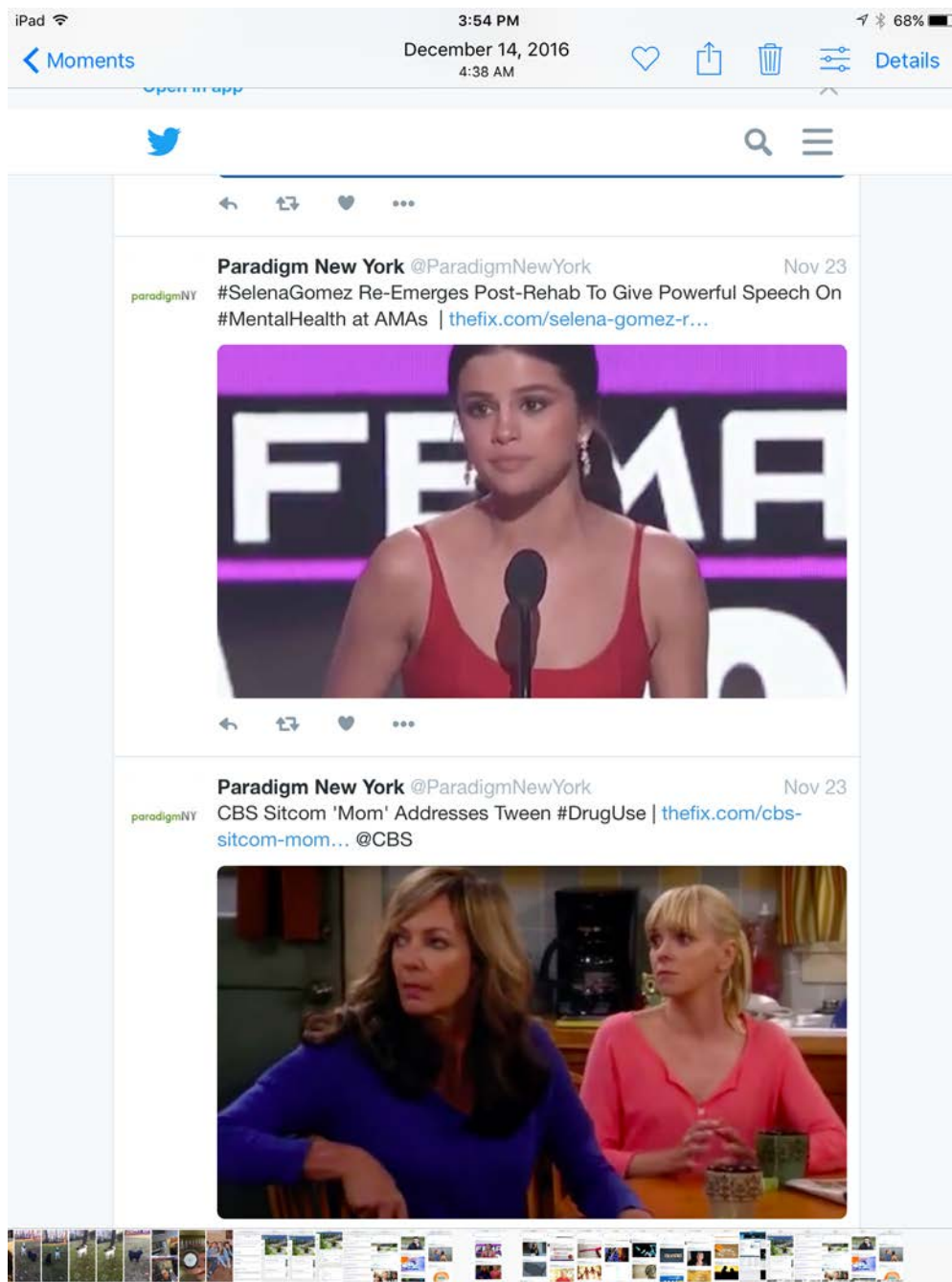
DEPRESSION?



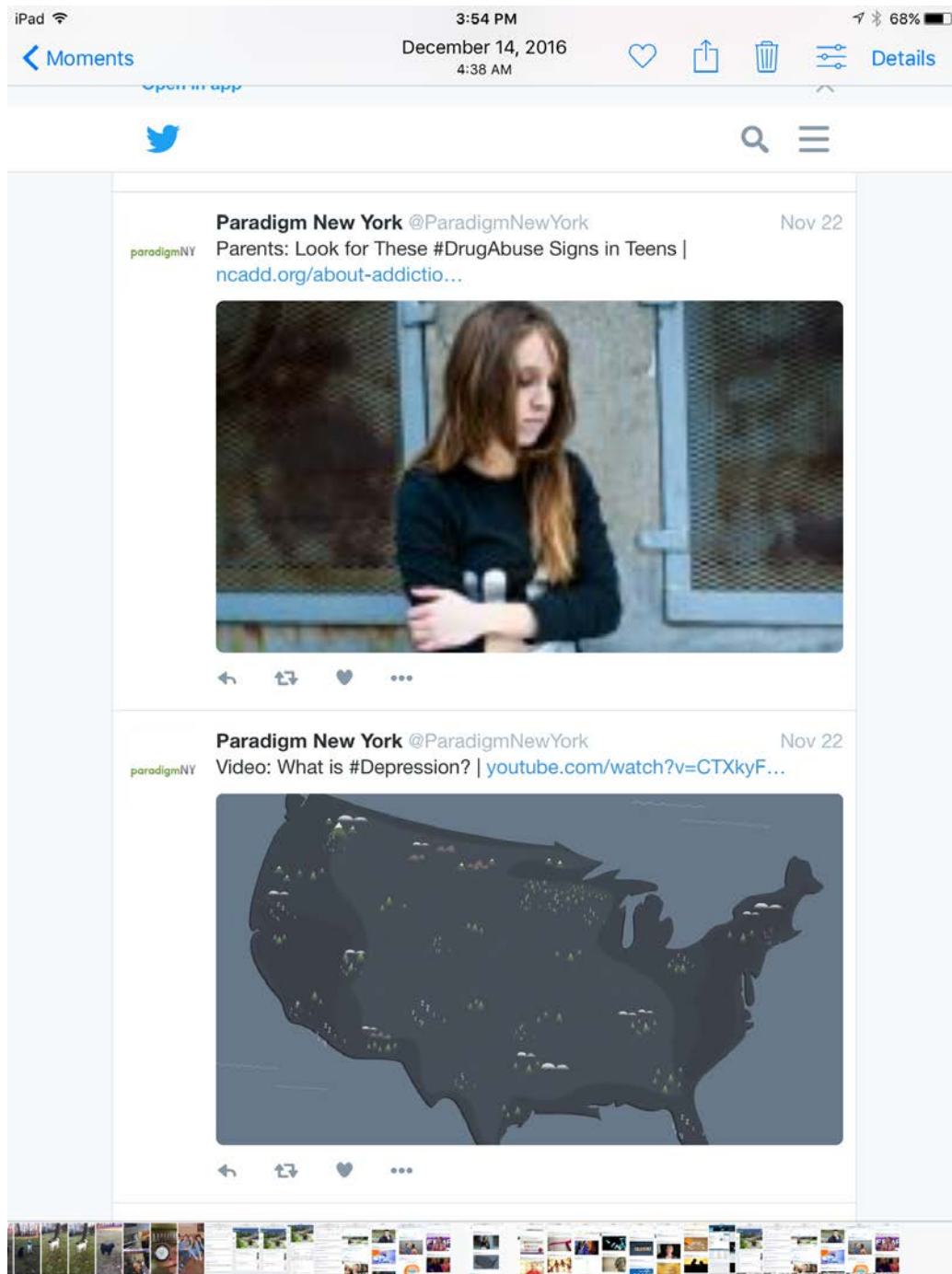
Play Video

Grid of image thumbnails at the bottom of the screen.

Paradigm Tweets – Example 3



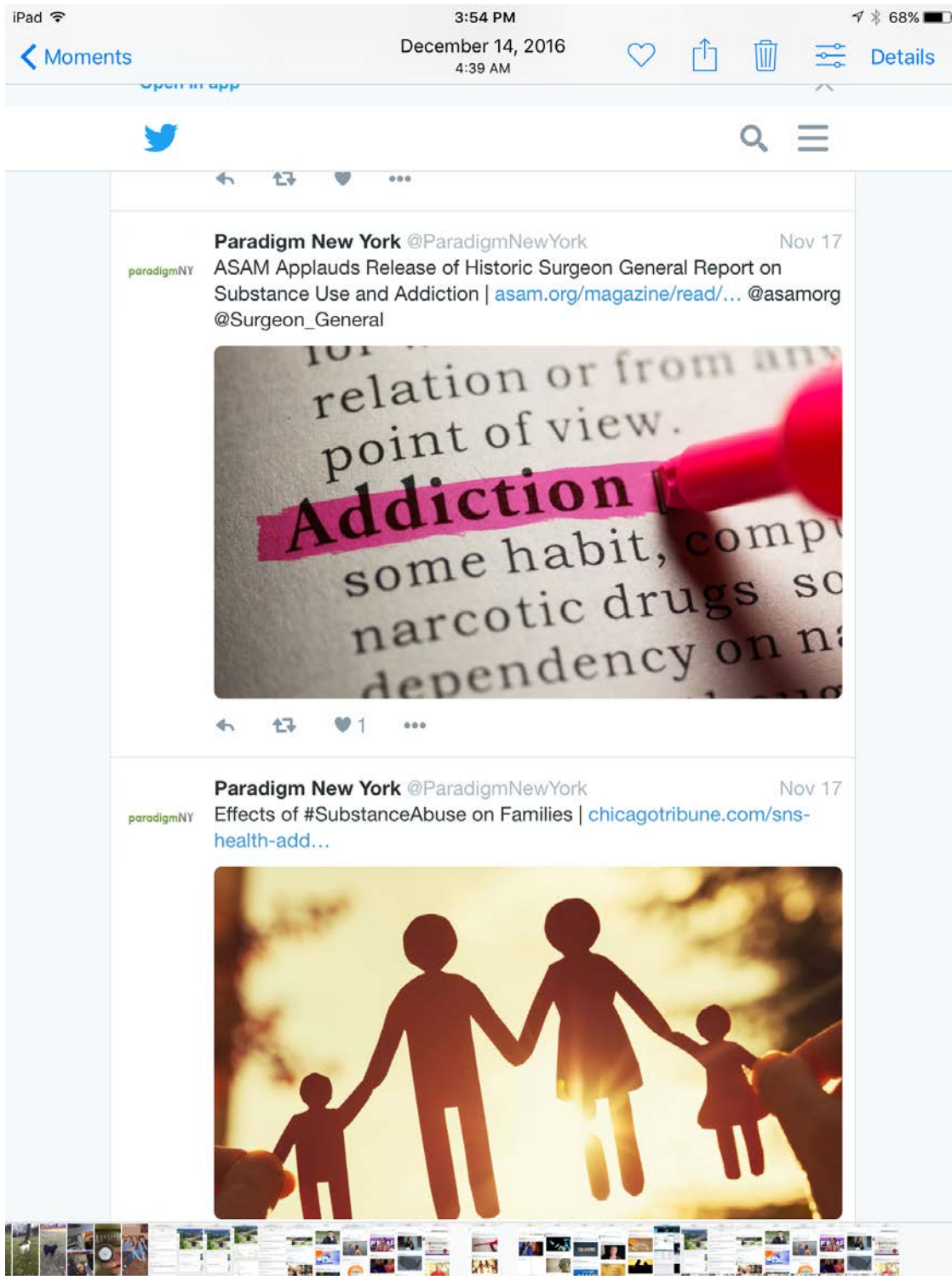
Paradigm Tweets – Example 4



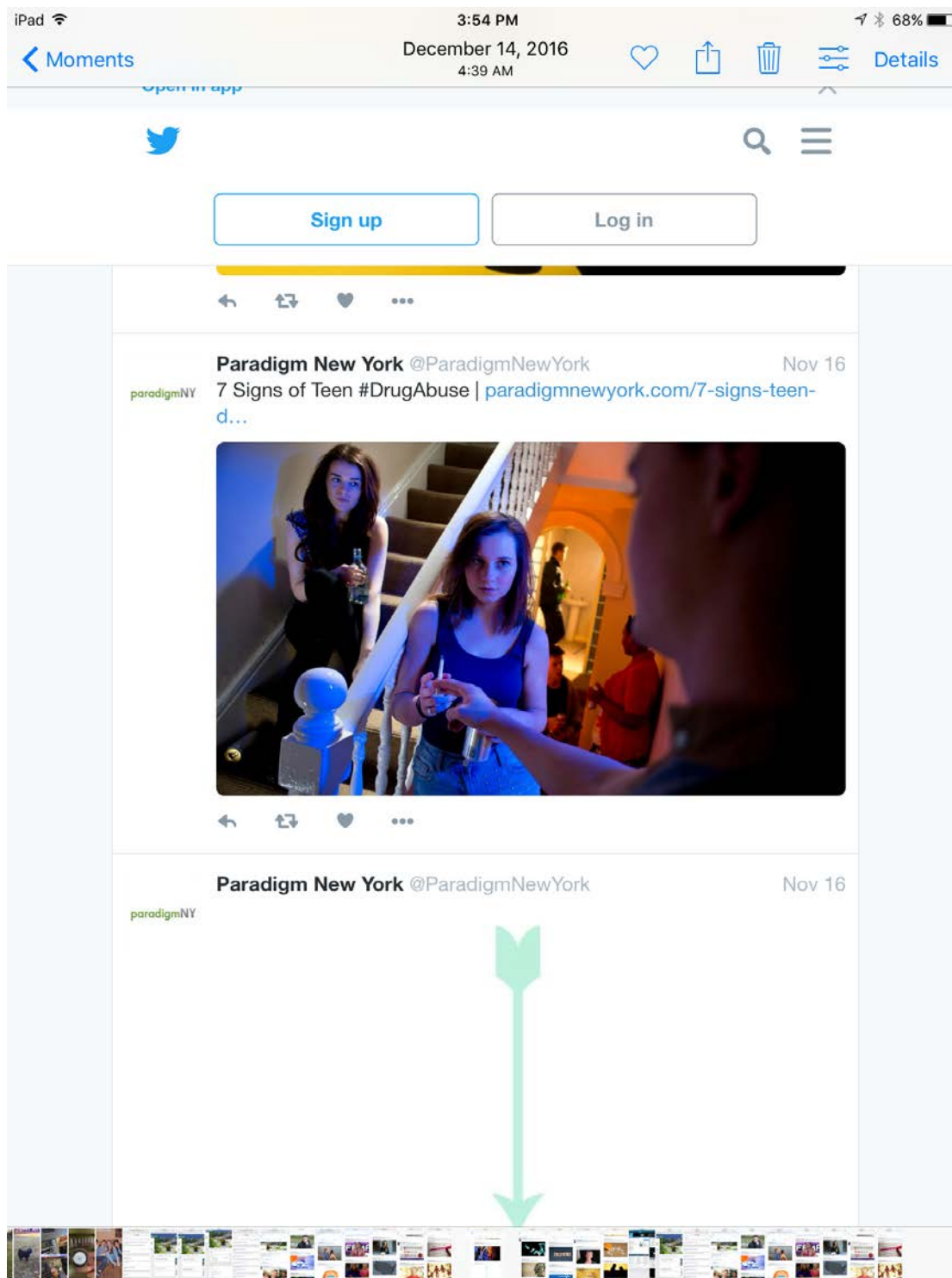
Paradigm Tweets – Example 5



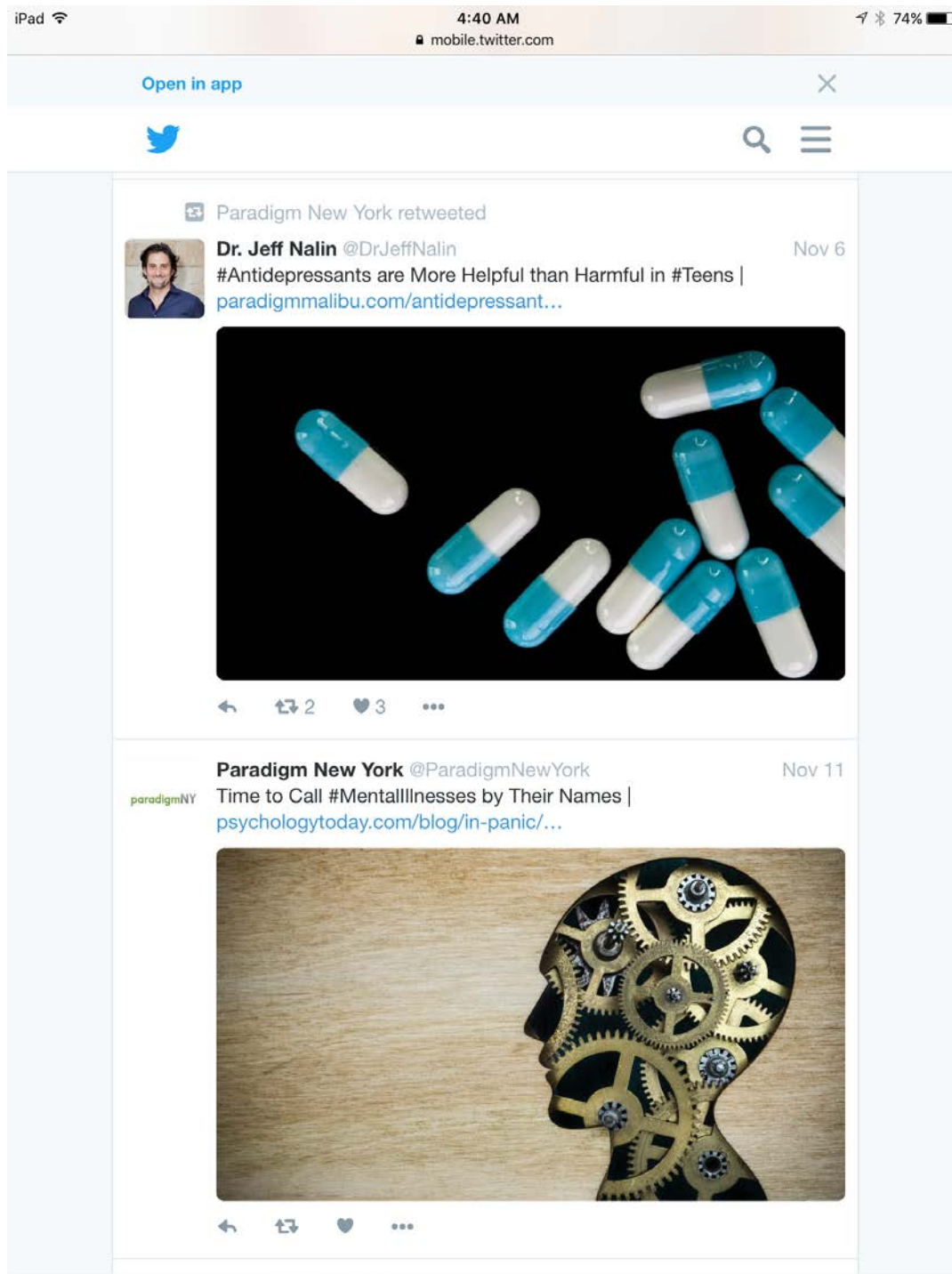
Paradigm Tweets – Example 6



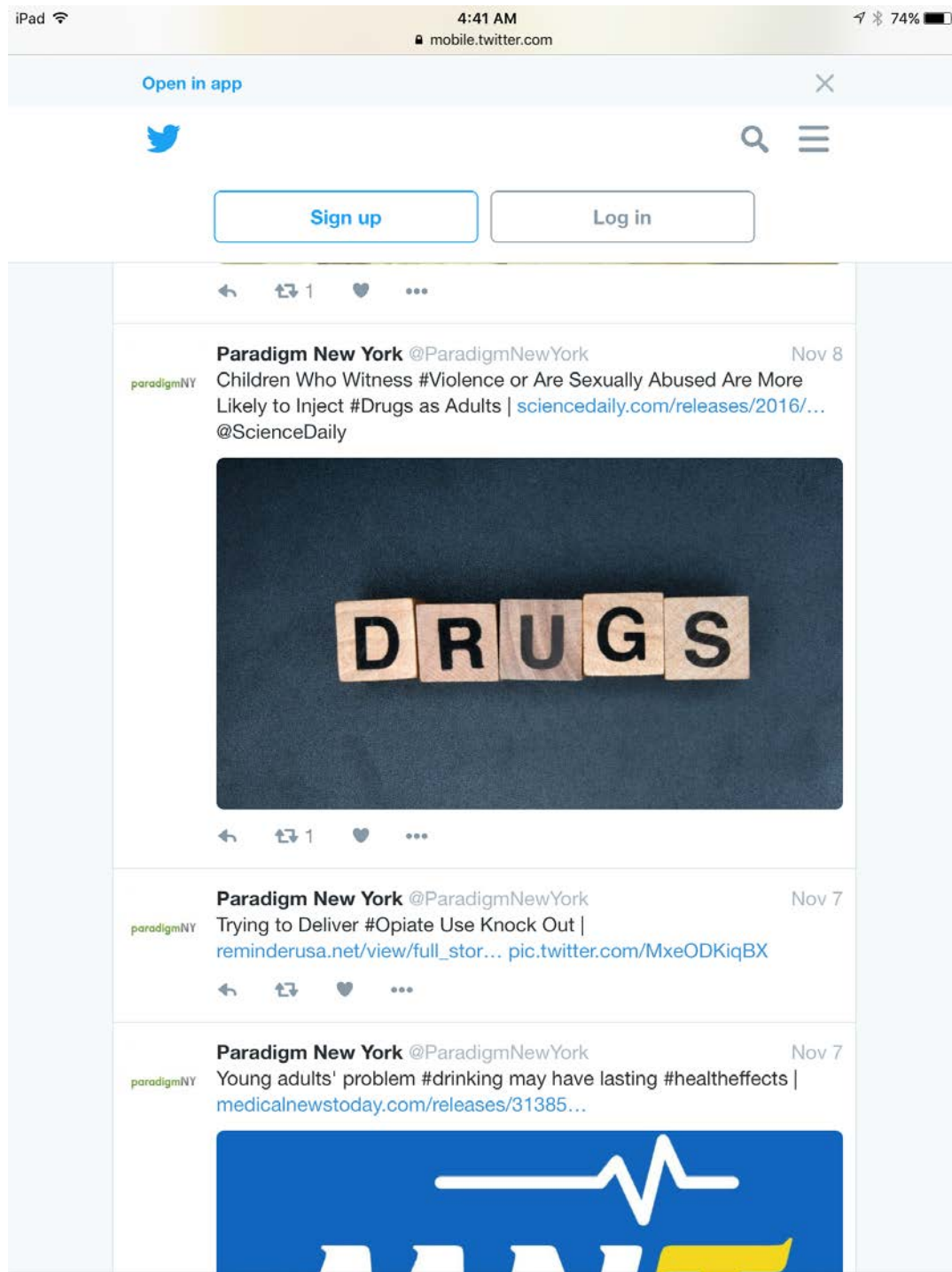
Paradigm Tweets – Example 7



Paradigm Tweets – Example 8



Paradigm Tweets – Example 9



Paradigm Tweets – Example 10

