

Introductory Number 1171 Testimony of Assistant Commissioner Samara Karasyk Before the New York City Council Committee on Finance

November 18, 2013

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Good afternoon, Chairman Recchia and members of the Committee on Finance. My name is Samara Karasyk, and I am the Assistant Commissioner for External Affairs at the Department of Finance. I am joined by Samuel Bufter, who was the Special Projects Manager at Finance for the 2013 lien sale. Thank you for the opportunity to testify regarding Introductory Number 1171, which would modify some elements of the annual lien sale. I would like to thank the Council for working with us on this proposal. We support its enactment.

On May 17th, Finance conducted another successful tax lien sale in conjunction with the Departments of Environmental Protection and Housing Preservation and Development, as well as the Office of Management and Budget. The goal of each year's lien sale is to have all eligible lien sale candidates pay their outstanding debts. We want to make sure that candidates who are not eligible for the sale are removed from the process. The sale is our most important tool for collecting unpaid taxes and charges, and for ensuring fairness and equity among all property taxpayers.

The 2013 lien sale process began in February with a pool of 27,930 eligible properties. In the 90 days that followed, we collected more than \$246 million from lien sale eligible property owners. As a result, liens were sold on only 5,420 properties — less than one in five properties from that original pool.

Exemptions Eligibility Checklist

Lien sale candidates that prove their eligibility for certain property tax exemptions, including Veterans, Disabled and Senior Citizen Homeowner Exemptions, are removed from the lien sale. When candidates believe they qualify for an exemption, they submit an eligibility checklist that is included in each of the four lien sale notices that we mail them. If the checklist indicates that

the property owner may qualify, we send an exemption application to the owner, which they can return to us to prove their eligibility.

Introductory Number 1171 would require the Department of Finance to post the lien sale exemptions eligibility checklist on our website on the first business day after the personal exemption application due date. State law mandates that March 15th is the application deadline. Because the checklist is only for lien sale candidates — and not for those who are trying to meet the March 15th deadline — we try to limit the availability of the checklist to owners who are candidates for the lien sale. Last year, at the Council's request, we posted the document online immediately after the personal exemptions deadline. This ensured that the checklist reached the appropriate audience. The bill codifies this practice and makes it permanent. Though we also mail the checklist with lien sale notices four times a year, we agree that posting it online after March 15th is a good way to provide additional access to those who need it.

Payment Agreements

The lien sale law allows for property owners to enter into no-money-down payment agreements when they are not able to pay all of their debts at once. This year, more than 1,349 property owners entered into payments plans with Finance, and 81% put no money down.

Currently, the law provides that the owner of a property or someone with legal rights to the property can enter into a payment agreement. In order to ensure consistent application of this requirement, in 2011, we issued written guidance to staff detailing the eligibility requirements for someone not listed on the property's deed. Those eligible include an authorized agent with a notarized power of attorney, a court-appointed guardian, or, in the event the legal owner has died, the owners' heirs. Introductory Number 1171 would require Finance to promulgate rules to codify these requirements, increasing transparency and providing public guidance to those who need it. Since the rulemaking process takes at least 90 days, we recommend amending the bill to ensure that we have adequate time to enact these rules. That minor amendment notwithstanding, we fully support this requirement. While we proceed with the rulemaking process, we will post our current guidance on the lien sale webpage at least 90 days prior to the 2014 lien sale.

In closing, I would like to thank you — Finance Committee staff and Council Members — for your partnership in this process. The success of the sale would not be possible without the tremendous efforts of our staff and all of you, who co-hosted events with us, called individual property owners, and answered countless questions regarding the sale. I look forward to working with the Council to schedule outreach events for next year's lien sale.

I would be happy to answer your questions at this time.

Legal Services NYC

TESTIMONY OF LEGAL SERVICES NYC BEFORE THE NEW YORK CITY COUNCIL COMMITTEE ON FINANCE ON PROPOSED INT. 1171-A A LOCAL LAW TO AMEND THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK IN RELATION TO THE SALE OF TAX LIENS

Monday, November 18, 2013 New York City

I am Justin Haines, director of the foreclosure prevention project at Legal Services-NYC-Bronx, and I submit this testimony on behalf of Legal Services NYC regarding Proposed Int. 1171-A. First, we would like to thank the Council for its leadership in addressing fairness in the annual tax and water lien sale and attempting to clarify the rights of heirs to enter payment agreements that would allow them to avoid the annual lien sale. We understand that there are many challenges in addressing this issue, especially in this time of economic austerity, so we thank you for your partnership in the pursuit of justice.

Legal Services-NYC is the nation's largest provider of free civil legal services to the poor. For more than 40 years, we have provided expert legal assistance and advocacy to low-income residents of New York City. Each year, our neighborhood offices across Manhattan, the Bronx, Brooklyn, Queens and Staten Island serve tens of thousands of New Yorkers—including homeowners, tenants, the disabled, immigrants, the elderly and children.

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Legal Services-NYC is also the oldest and largest provider of foreclosure prevention legal services in New York City. For more than a decade, we have challenged abusive lending and home sale schemes—from redlining to subprime lending to loan mod scams. We currently operate four dedicated foreclosure prevention projects with approximately 50 attorneys and paralegals working in some of the hardest hit neighborhoods across the Bronx, Brooklyn, Queens, and Staten Island. To date, we have assisted more than 7,000 families at risk of losing their homes. We, therefore, have an informed perspective on the challenges homeowners face in all aspects of the foreclosure process, and, in particular, the loss mitigation process.

Today, specifically, I would like to speak to the difficulties low-income families face when attempting to resolve issues concerning homes inherited from deceased family members. While the proposed legislation is well-intentioned, we believe that as presently amended the bill does not improve heirs' ability to enter pre-lien sale payment agreements, primarily because it leaves it to the Departments of Finance and Environmental Protection to define heirs' eligibility to enter installment agreements, without mandating defined criteria needed to ensure fairness and avoid needless lien foreclosures that adversely affect the fabric of low-income communities across New York City. We believe that certain key changes to the bill can make it far more effective at achieving the good intentions which motivated its proposal.

I. The Department of Finance's Current Policy is Unnecessarily Stringent

The New York City Department of Finance ("DOF") already has a policy to guide the determination of the "owner" of a property for purposes of entering into payment agreements to resolve tax liens. Under this policy, only a person on the last recorded deed on ACRIS or someone presenting a more recent than the last recorded deed, may enter a payment agreement. If that owner is deceased and has a will, then a named beneficiary in that will to whom the property is bequeathed may enter a payment agreement. The executor of the will cannot enter a payment agreement unless that executor has obtained a court order authorizing the executor to enter a payment agreement with the DOF.

If the owner of the property is deceased and there is no will, which is more frequently the case in low-income communities, DOF's policy requires three things. First, an Administration proceeding must be started in Surrogate's Court. Second, an Administrator of the estate must be named. Third, the Administrator must obtain a court order authorizing the Administrator to enter a payment agreement. Alternatively, if the Surrogate's Court has determined the beneficiary of the estate and documentation of that from the Court exists, then either the beneficiary may enter a payment agreement or the Administrator may enter a payment agreement if the Administrator has a valid power of attorney from the beneficiary. This policy, although a principled approach, is unnecessarily burdensome to most low-income heirs seeking to avoid the annual lien sale and ultimately foreclosure. Furthermore, these beneficiaries are not allowed tax exemptions such as the Senior Citizen Homeowner Exemption, Disabled Homeowner Exemption or the Veteran Homeowner Exemption that would reduce their tax burden and help them remain exempt from the annual lien sale.

II. Low Income Heirs Have Difficulty Resolving Estate Matters Through Administration Proceedings

My experience in the Bronx, one of the country's poorest communities, is that most homeowners die without a will. I encounter difficult situations where spouses or children of the deceased are trying to save their home from foreclosure but the mortgage company refuses to even talk with them because they are not "on the loan." For those heirs we advocate with very resistant mortgage servicers to allow them to assume the mortgage loan and obtain loan modification agreements in order to address the arrears. In our experience, properties facing tax lien foreclosures are rarely encumbered by mortgages, because the lenders are typically interested in maintaining their first lien position and will pay taxes and insurance even if the homeowner defaulted on the loan, in order to avoid a tax lien from taking priority to their claim. In the Bronx, as well as in other low income communities in the City, a home is a significant asset and passing it on to a spouse or children free of a mortgage is a way of transferring wealth in the form of home equity to the next generation. The tax lien sale and subsequent foreclosures on these

mortgage-free properties threaten to wipe out this accumulated wealth in much the same way that the mortgage foreclosure crisis and the banks withholding of principal reducing modifications are devouring any accumulated equity in these low income and minority communities.

DOF's policy is burdensome for most heirs first because it requires that an estate administration proceeding be filed. This requirement is contrary to long standing common law and case law which established that "the title to real estate, upon the death of the owner, vests **immediately** in his heirs and devisees, and at common law they took it free from his general debts. It can be taken for the payment of debts now only by virtue of statutes, and the statutory provisions must be strictly pursued in order to justify its sale." Kingsland v. Murray, 133 N.Y. 170, 174, 30 N.E. 845, 846 (1892). Although this principle that heirs' rights in the real property of their deceased family members is immediate upon death of the owner, DOF's current policy does not acknowledge that the heirs are immediately vested with a legal interest in the property and instead forces heirs to have their right validated through a time and money intensive court proceeding.

For low income New Yorkers, starting an estate administration proceedings is difficult, to say the least. First, free legal service providers generally are unable to provide such services, and there is a dearth of resources available to the low-income communities that require them. Indeed, when our clients have required such services in the Bronx, I have sought pro bono assistance from the private bar, usually without success.

Another option is to involve the public administrator to commence the estate administration. Although the public administrator will handle all the matters necessary to resolve the estate and distribute its assets, the public administrator is entitled to a fee for its services equal to six percent of the estate when the estate is \$750,000 or less. In a case involving a home of \$500,000 that means the fee to the public administrator is at least \$30,000. For low-income families, incurring such an expense effectively can force the sale of the home.

The cost of administration proceedings, furthermore, are also much higher than other court

matters. The administration filing fee is \$625.00 for estates valued between \$250,000 and \$500,000 and \$1250.00 for estates \$500,000 or larger. It is not uncommon to have multi-family homes worth \$500,000 or more in New York City, even those in low-income communities. While New York does have a *pro se* small estates program for estate valued at less than \$30,000, with a de minimus filing fee of only \$1.00, this program is of no assistance to estates in which real property is involved, because such estates are valued more than \$30,000.

Furthermore, because the Administrator of the estate acts as a fiduciary, the Administrator is also required to post a bond to protect the beneficiaries of the estate in the event he or she fails to perform his or her fiduciary duties faithfully, which presents yet another obstacle to low-income heirs attempting to comply with the requirements for administration of an estate. Bonds are not easy to get and like a loan are dependent on the application financial ability and credit score.

I would like to highlight how difficult these Administration proceedings are by sharing three cases from my office that we are currently handling. In the first case, my client Thomas is a 64 year-old disabled veteran who is the sole heir to his parent's property in Riverdale in the Bronx. The home is valued by the Department of Finance at \$900,000. Thomas lives in his parent's home but when some of the bank accounts he inherited from his mother dried up he found it difficult to keep up with the water, electricity and property taxes, because he is unemployed and perhaps unemployable, since like many disabled veterans, he suffers from mental health issues, leaving him to panhandle for cash every day. I first encountered his case when his neighbor and childhood friend came to our foreclosure court clinic in an effort to help him avoid the lien sale by assisting him in completing the application for the Veteran's and Senior homeowner tax exemptions. When I started working with him, it became clear that he has an anxiety disorder and he could not stay in the office for more than twenty minutes or so. We were able to help him get food stamps and get a copy of his military discharge records. However, because he was not the record owner of the property his application for a tax exemption was denied.

I began to look into his estate issue. It turns out that he had started an Administration proceeding

in 1997 but it was never completed. He was granted letters of Administration but was required to post a \$50,000 bond, which he was unable to do.. So he lived in this mortgage-free house over the fifteen years using some of his late mother's bank accounts to pay for monthly bills until those accounts ran out three years ago. His property tax arrears were sold as part of the annual lien sale, and two months ago a foreclosure action was started against his mother's estate. After the lien sale last year, I argued on his behalf for recognition of his rights in the property and his entitlement to the exemption: I sent DOF documentation, including his letters of administration and his petition for Administration in which it was disclosed that he was the only heir to the property, but DOF was unmoved and refused to recognize him as the property owner. He now faces the loss of his home worth approximately \$900,000 because of the tax lien related to an indebtedness of \$44,000. We have engineered a solution to this case, but no thanks to DOF. Rather, Thomas is applying for a reverse mortgage that will give him funds to pay off the tax lien foreclosure and provide him a steady stream of income. The reverse mortgage company is working with a title agency that will accept a new deed from the estate along with an affidavit of heirship from him documenting that he is the sole heir, all outside of the Administration proceeding he started 15 years ago..

Another client of ours, Carole, has been in foreclosure for a tax lien for over three years. Carole is 62, suffers from early onset Alzheimers and relies on a fixed income of disability benefits. She too is resolving the estate issue and tax lien foreclosure by working with the same reverse mortgage company, and she is closing on her loan this Wednesday. If we had not had a sympathetic judge who granted multiple adjournments over several years, this solution would not have been possible, as she only recently turned 62 and became eligible for a reverse mortgage.

A third client of ours dealing with tax lien problems is a veteran named Jeffrey who suffers from Post-Traumatic Stress Disorder and is also Bi-polar. We assisted him along with the help from CUNY Law School to finish the Administration proceeding he started on his own, and we were able to transfer the property into his name in a new deed. Unfortunately it took over two years for the estate to be

resolved and there is \$25,000 in a property tax lien that needs to be paid. He is too young for a reverse mortgage and he is applying for a traditional mortgage to pay off the tax lien. Unfortunately he is having a very difficult time getting a conventional mortgage because, since the mortgage crisis, mortgage underwriting has become far more stringent and he relies on veteran disability benefits while he goes back to school. His lack of significant income is a barrier to obtaining the mortgage he needs to be able to pay off this property tax debt, and he may be forced to sell the property if he cannot secure a mortgage. If he could have entered into a pre-sale installment agreement, it would have been easier as he would not have to undergo a traditional underwriting process that is necessary to secure a mortgage.

I wanted to share these stories with you to illustrate that many of our most vulnerable homeowners for whom these exemptions were specifically designed are the ones facing the loss of their most significant asset and stable housing due to tax lien foreclosures that are intertwined with estate issues. It has been extremely hard for them to get through the administration process and to comply with the current Department of Finance requirements for entering into payment agreements. The barriers erected by DOF are especially difficult to understand given that these heirs have immediate rights in their properties upon the death of the owner, and DOF's unwillingness to enter into payment agreements with heirs without court orders is simply inexplicable.

III. Suggested Improvements to the Legislation

Due to the complicated nature of estate matters, we think the best approach would be to exempt the property tax or water arrears of a deceased owner from the lien sale altogether. This would allow potential heirs enough time to resolve the estate issues. The relatively small number of properties that would be exempt from the lien sale because of an unresolved estate likely represents a small fraction of the properties included in the annual lien sale, and the exclusion of those properties from the annual lien sale with not have a substantial financial impact to the City.

If the Counsel does not exempt such properties from the lien sale, then, at a minimum, the current legislation should be amended to allow potential heirs to enter into installment agreements without starting an Administration proceeding and obtaining a court order allowing them to enter a payment agreement. While Int. 1171, the original bill, came close to allowing payment agreements without the start of Administration proceeding or a court order, it did not define the term "other eligible persons" entitled to the relief enacted by the legislation, leaving it to DOF and DEP to do so, both of whom are likely to define "eligible persons" consistent with their current restrictive policies. The goal of the installment agreements is to avoid the loss of real property and avoid inclusion in the lien sale. Avoiding the loss of the property is only a benefit to the estate or to those entitled to the real property under intestacy. By allowing an heir who comes forward to pay the debt through an installment plan, no transfer ownership of the property is effected, nor does such an agreement determine who the lawful owner of the property is. The party signing the agreement is merely undertaking to pay a debt, and there is no colorable reason for needlessly restricting the ability of heirs to volunteer to make such payments, especially since their agreements to do so benefits the distributees of the decedent and the City. DOF's currently policy, of course, is particularly cruel to heirs such as widows and orphans, who may not have been on the deed, but who confront the loss of a longtime home over relatively small arrears amounts.

New York Estate Powers and Trust Law Section 4-1.1 defines who is a distributee of someone who passes away without a will. If there is a surviving spouse and children, then the spouse gets \$50,000 plus half the estate and the other half goes to the children. If there is a surviving spouse and no children, then the spouse gets the entire estate. If there is no surviving spouse but there are children, then the estate goes to the children. If there is no spouse and no children, then the estate goes to the parents of the deceased. These are all relationships that can easily be established by DOF by reviewing a death certificate, birth certificate or marriage license submitted by the person seeking to enter into the installment agreement.

Our recommendation would be to allow the spouse, children or parents of a deceased person to

enter into an installment agreement without having to start an Administration proceeding, upon submitting proof of the death as well as documentation that establishes heirship such as a marriage certificate or birth certificate. The person entering the agreement could also sign an affidavit similar to an affidavit of heirship acknowledging the death and their relationship to the deceased person. The affidavit could also explicitly acknowledge that by entering an installment agreement that no ownership interest in the property is being conveyed. New York Penal Law 175.30 and 175.35 already make it a crime to offer a false instrument for filing with a government office so that any falsification of an affidavit would also be a crime.

Lastly, we recommend that, beyond installment agreements, heirs should also be extended the protections of the tax exemptions for which they would qualify if they were the record owner of the property. A similar procedure or affidavit as described above could be developed and submitted simultaneously with the application for exemption. Some of the most vulnerable New Yorkers are being denied these benefits and are facing the loss of a significant asset and affordable housing due to the annual lien sale. The Council should make every effort to protect these homeowners and prevent the city from becoming an instrument of injustice.

Thank you again for the opportunity to testify before the Committee.

Respectfully submitted,

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FOR THE RECORD

Friday November 15, 2013

Ref: Proposed Int. 1171-A, A Local Law to amend the administrative code of the city of New York, in relation to the sale of tax liens

The Brownstoners of Bedford-Stuyvesant, Inc is a not-for-profit, 501(c) (3), volunteer service organization that is dedicated to the continued preservation, revitalization and enhancement of the community of Bedford-Stuyvesant.

Over the past thirty-two years we have been active in Bedford-Stuyvesant by promoting literacy through our multi-year Reading Awareness initiative which includes the distribution of more than 10,000 reading pledge cards to adults; our Open School Welcome Project, which posts teams of volunteers at information tables. We host these tables in area primary public schools for community outreach. We have been conducting non-partisan voter registration drives since our inception, and we are humbled by the response from men and women who felt disenfranchised for any number of reasons. This year, we will be hosting our thirty-fifth annual house tour which was designed to stem the tide of flight by middle-class families. Proceeds from the past thirty-five house tours have funded over 50 scholarships awarded from the Bernard McDonald/George Glee, Jr. Memorial Scholarship Fund. Both men were founding members of the organization. The McDonald/Glee Jr. scholarships have been awarded to Boys and Girls High School collegebound graduates. These graduating students attend historically black colleges or universities. The scholarship is not a one-time payment. The students receive this scholarship throughout their undergraduate studies provided they maintain a required GPA. We also use the house tour proceeds to award the Joan Maynard Scholarship to graduates of Brooklyn Academy High School. These college-bound graduates receive a one time award.

Perhaps the most compelling of our initiatives is the Liens Sales Outreach Project, which was started over thirteen years ago, at the request of then Councilmember Annette M. Robinson, who expressed great concerns about the high numbers of residents who were in danger of losing their homes due to tax arrears. She had already established an event which is now known as HELP NIGHT. HELP NIGHT involves bringing representatives from the Department of Finance to a central location in the community so that residents can pay arrears, make installment arrangements, or check their status. However, not many homeowners were taking advantage of this incredible resource. We put our heads together, and the Liens Sales Outreach Project was born. The project is a simple, but powerful grass-roots effort that takes teams of Brownstoners to the door of every homeowner on the lien list within Community District 3. When Councilmember Vann took office, he continued to support the project, and he has been unwavering in making certain that all elements are in place for an effective initiative.

In past years, the lien sale numbers have ranged between 1,200 and 1,900 homes in Bedford-Stuyvesant. Members of the Brownstoners undertake everything from dividing the huge lien list into block-size parcels to assembling the thousands of copies that go into the packets for the homeowners. Through the years, these neighbor-to-neighbor visits have resulted in saving hundreds of homes that would other wise have gone into the actual lien sale process. The annual HELP NIGHTS routinely bring out over one hundred residents, and this turn-out is the direct result of the Brownstoners door-to-door outreach. One must actually witness the relieved faces and words of thanks to understand the impact of this endeavor.

Eight years ago, Councilmember Vann established the *Know the Facts Collective* in order to provide homeowners with local technical assistance from community development agencies that include the Bridge Street Development Corporation, Neighborhood Housing Services of Bedford-Stuyvesant, Bedford-Stuyvesant Restoration Corporation, Northeast Brooklyn Housing Services, and Community Board 3.

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The Brownstoners neighbor to neighbor outreach and partnership with the Know the Facts Collective was an invaluable service to the Bedford-Stuyvesant community. Together, we were able to slowly reduce the numbers on the tax lien list. Then, along came the 2007 legislation that established delinquent water and sewer bills as a benchmark for liens. We all know what happened as a result.

In the past six years, we found ourselves not only right back where we started, with so many of our neighbors in danger of losing their property, but we are in even more dire straits. The water lien has been particularly devastating to seniors who own their homes free and clear, and to those of the next generations who have inherited property with no outstanding mortgages. They pay their property taxes, but still are not familiar with the water tax and lien process. Our experiences also document the large number of owners who no longer live in their homes, and who may not be aware of this new situation.

Bedford-Stuyvesant has one of the largest homeownership rates in New York City. We are justly proud of the men and women, who, from one generation to the next, have maintained family and community ties that are rooted in the tradition of owning a home. That nch history dates back to the men and women of African descent who helped to build this great city, and who settled in communities such as Weeksville and became proud citizens. Families have scrimped and saved to make certain that mortgages and taxes were paid so that a precious legacy could continue. However, the harsh economic down-turn has left residents in communities of color such as Bedford-Stuyvesant, in serious peril, and the 2007 bill which spawned the water lien added yet another threat to people who were already struggling.

The passage of Int. 1171-A would provide much-needed relief to our neighbors. During our doorto-door outreach, we found that many of our senior, disabled and active military residents did not know that they could qualify for exemptions, and the approach outlined in the legislation would put more of the onus on the Departments of Finance and Environmental Protection to establish eligibility. Seniors who are owners of Class I properties who are enrolled in the Enhanced Star Program would be able to take advantage of the higher income ceiling. The time sensitive benchmark for inclusion in the lien sale would provide time for additional notification to homeowners, along with the opportunity for homeowners to become more familiar with the process.

The reforms stipulated in Int. 1171-A are not only vital to individual homeowners in our community, but they will also protect the culture and stability of one of the jewels in New York City's crown of ethnic neighborhoods. The members of the Brownstoners stand in support of this legislation. We are grateful to the Honorable Albert Vann for his stance on voting against the 2007 legislation, and his continued efforts to support community development.

Sincerely submitted by the Executive Board of the Brownstoners of Bedford-Stuyvesant, Inc.

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Electronically signed by: Ava Barnett, President

THE COUNCIL THE CITY OF NEW YORK

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THE COUNCIL THE CITY OF NEW YORK

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Name: SAMARA KARASYK, ASSISTANT COMMISSIONER
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