

October 30, 2025

Hon. Julie Menin
Chair, Committee on Consumer and Worker Protection
New York City Council

RE: Int. 1391-2025

Dear Chair Menin:

I write today in relation to Introduction 1391-2025, a proposed Local Law to amend the administrative code of the City of New York, in relation to the establishment of compensation and training standards for security guards.

This administration appreciates the critical role that security guards play in maintaining public safety in the City of New York and is supportive of efforts to improve working conditions for all New Yorkers, particularly those who work in hazardous industries.

However, as this legislation acknowledges, there are already State laws that regulate the licensure and training of security guards. *See* N.Y. Gen. Bus. Law Art. 7-A. We believe that this legislation requires further review to understand how it relates to existing state law and the impact that this proposed law would have on security guard businesses, including those self-employed as security guards, in the City. As an example, State law requires that security guards receive eight hours of pre-assignment training, 16 hours of on-the-job training, and eight hours of annual in-service training to qualify and maintain a security guard license, with armed security guards required to undergo additional training. This legislation would require an additional 16 hours of initial instruction and an additional eight hours of annual training at City-approved security guard training schools. These additional requirements, in particular the requirement that the City assess and approve security guard training schools and curricula, may unnecessarily overlap with the State's existing Division of Criminal Justice Services Security Guard Program. Further, additional review and consideration is necessary to understand the impact of the legislation's requirement that self-employed security guards be required to pay to attend this training out of pocket while not being able to work shifts using their valid New York State security guard license.

Additionally, we note that the approximately 82,000 security guards working in New York City are entitled to the worker protections enforced by the City, such as the Paid Safe and Sick Leave Law and other laws of general applicability, like the Commuter Benefits Law. The NYC Paid Safe and Sick Leave Law requires employers to provide workers with leave to care for themselves or family members, or for "safe leave" related to domestic violence, sexual assault, stalking, or human trafficking. In particular, employers with 100+ workers must offer 56 hours of paid leave; those with 5-99 workers, 40 hours paid; and smaller employers with under \$1 million in net income, 40 hours unpaid. Since January 1, 2025, employees are also entitled to 20 hours of paid parental leave. The law bans retaliation, requires written policies and record-keeping, and is enforced by DCWP. Finally, the Commuter Benefits Law in New York City guarantees that employers offer a

pre-tax transit benefit to employees, allowing workers to use up to \$325 per month of pre-tax income for qualified transportation.

We look forward to working with you on this matter on behalf of all of those who keep New York City safe and hope to make this legislation work for all.

Sincerely,

Tiffany Raspberry
Deputy Mayor for Intergovernmental Affairs

Thursday, October 30, 2025

Testimony of the New York City Hospitality Alliance

In Opposition to Int. 1391 – Establishment of Compensation and Training Standards for Security Guards

The New York City Hospitality Alliance is a not-for-profit association representing thousands of restaurants, bars, and nightclubs across the five boroughs.

We respectfully submit this testimony in opposition to [Int. 1391](#), which seeks to establish compensation and training standards for security guards employed by businesses in the City of New York. The State of New York licenses security guards, and thereby we believe they should not, and cannot, be regulated by the City of New York. Moreover, as it creates a new minimum wage for these security guards, we further believe that is power delegated to the State of New York.

If enacted, this legislation would conflict with well-established New York State law, which expressly prohibits the City of New York—or any other municipality—from setting minimum wage rates that differ from those established by the State. Under *Wholesale Laundry Board of Trade, Inc. v. City of New York*, the New York Court of Appeals made clear that the authority to set minimum wages for specific categories of workers rests solely with the State of New York, not with local governments.

Small businesses in the hospitality industry already face significant financial and regulatory burdens under constantly evolving city, state, and federal laws. Implementing Int. 1391—which we believe is unlawful—would only exacerbate these challenges. The proposal would make it even more difficult for restaurants, bars, and nightclubs to engage security personnel who play a vital role in maintaining the safety of both guests and employees. In fact, this bill could very well discourage businesses from hiring security staff, potentially putting public and worker safety at risk, while reducing job opportunities.

While we oppose Int. 1391, the New York City Hospitality Alliance supports the goal of enhancing training for security guards, if it is tailored to the unique needs of the restaurant and nightlife industries. We urge the City Council to defer all wage, benefit, and training standards to the State of New York, and respect the separation of powers in our state's tiers of government.

Thank you for your consideration of our comments.

Please contact our executive director Andrew Rigie at 212-582-2506 or arigie@thenycalliance.org with comments or questions.



Testimony to

New York City Council

Intro 1391-2025

Establishment of compensation and training standards for security guards

Presented by

Frank Kerbein

Director, Center for Human Resources

October 30, 2025

The Business Council of New York State, Inc., on behalf of our more than 3,500 members, opposes the establishment of unique compensation and training standards for security guards, asserting that such a measure is legally invalid and a usurpation of the state legislature's authority. This position is grounded in the precedent established by the New York Court of Appeals in the 1963 case, *Wholesale Laundry Board of Trade, Inc. v. City of New York*. This landmark decision clearly affirms that the New York State Labor Law occupies the field of minimum wage regulation, thereby preempting local municipalities from enacting their own, differing standards.

The Preemptive Authority of the State Labor Law

The New York Court of Appeals' ruling in *Wholesale Laundry* determined that New York State law explicitly reserved the field of minimum wage regulation to the state. The decision recognized that the state had enacted a comprehensive and uniform scheme for wage standards across all of New York, and that allowing municipalities to create their own, potentially higher, rates would undermine this state-level uniformity.

The court's logic can be summarized by these key principles:

- **Comprehensive State Scheme:** The existence of a comprehensive state law on a subject indicates a clear legislative intent to occupy that field exclusively. The New York State Labor Law is a comprehensive statute governing wage standards and hours.
- **Conflict with Local Laws:** A local law that prohibits or discourages that which a state law permits—such as paying the state-mandated minimum—is in direct conflict with state legislative intent.
- **Inconsistency and Confusion:** A patchwork of varying local minimum wage rates across the state would lead to administrative and economic chaos, creating inconsistency for businesses operating across municipal borders and confusing for workers.

Economic and Administrative Implications

Beyond the legal preemption argument, a mandated city-specific minimum wage would introduce a number of negative economic and administrative consequences:

- **Distorted Labor Markets:** Setting a higher wage floor for certain positions in New York City could distort regional labor markets.
- **Increased Costs for Businesses:** An increased minimum wage and benefits would raise overhead costs for New York City businesses. To compensate, businesses may be forced to reduce hiring, cut employee hours, or increase prices, which could ultimately harm consumers and employment. This is not consistent with the goal of making New York City “affordable.”
- **Disruption of Uniformity:** The existing tiered system, established by the state legislature, already addresses regional cost-of-living differences. Forcing an additional city-specific increase would disrupt this carefully negotiated, state-defined framework and introduce an unnecessary layer of complexity and potential conflict with state regulations.

Conclusion

Based on the legal and economic principles discussed above, and relying on the historical precedent established by the New York Court of Appeals in the *Wholesale Laundry* decision, we maintain that Intro 1391-2025 is legally invalid and contributes to the perception that New York City is not a place for business. The state has exercised its authority to occupy this field of law. Any attempt by New York City to enact the changes described in the bill would be an overreach of its municipal powers and an affront to the established statewide legal framework. We urge all parties to oppose any such proposal and respect the principle of state preemption on this matter.



Hotel and Gaming Trades Council

707 8th Ave
New York, NY 10036
(212) 245-8100

MEMORANDUM OF SUPPORT
The Aland Etienne Safety and Security Act

Intro 1391

October 30, 2025

The Hotel and Gaming Trades Council urges the immediate passage of the Aland Etienne Safety and Security Act, which would provide sensible employment standards for security guards in New York City. The bill provides for pay, benefits, and paid leave standards which should **reduce turnover in security guard employment**. It also provides additional workforce training to newly hired security guards, **improving workforce preparedness of the security workforce and leading to better safety outcomes**.

HTC represents security guards working in hotels across the city, and we know the value this bill will add to public safety. Our security guard members work to protect tourists, their fellow workers, and everyone else who enters a unionized hotel, club, racetrack, or casino in NYC. We can speak from experience that better training standards and better wage and benefit standards serve to enhance the capabilities of security guards. We achieve high standards through our collective bargaining agreements with employers in NYC, but we would all benefit from high standards in the security guard profession, generally. **This bill goes to the heart of an ongoing issue in this sector, and gives workers the tools they need to thrive as security guards.**

HTC thanks Speaker Adams and every sponsor of the Aland Etienne Safety and Security Act. We appreciate and applaud the attention this Council has paid to the concerns of working New Yorkers. **HTC urges you to act now and pass Intro 1391.**

Thank you, Chair and members of the Committee, for the opportunity to testify today. I am Niki Franzitta, Esq., Vice President of Member Relations and Development of the Hotel Association of New York City, representing more than 300 of the City's hotels and 40,000 employees.

Our industry shares the Council's commitment to maintaining safe, fair, and professional workplaces. Security guards play a vital role in protecting guests, employees, and property, and hotels already invest heavily in safety and training through collective bargaining agreements and state licensing requirements.

We have several concerns about how Int. 1391 would function in practice.

First, we would welcome consideration of a collective bargaining agreement carve-out. Many hotels already operate under strong union contracts that provide robust wages, benefits, and training provisions. Allowing those agreements to satisfy the bill's requirements would help avoid duplication while maintaining the high standards those contracts already ensure.

We would also encourage clarification that a violation of this law would not also constitute a violation of the Safe Hotels Act, and are happy to work with you on language that demonstrates this, if amenable to the Council. Keeping the two frameworks distinct would help maintain focus on their respective purposes and avoid confusion in enforcement, especially as it relates to the maintaining of a hotel license.

Finally, we believe the Council could consider adjustments to implementation timelines and enforcement methods to ensure compliance remains practical—particularly given that the 120-day training requirement may overlap with the IWA's 60-day probationary period for new hotel employees. While the law does not technically require training to be completed before probation ends, the timelines could overlap in a way that makes it possible that the required training will need to be completed during the probationary period in order to comply. This would entail extensive scheduling and cost challenges for hotels across the city.

Thank you for your time and for the opportunity to testify today. HANYC looks forward to continuing to work with the Council on this legislation.



**TESTIMONY BEFORE NYC COUNCIL
COMMITTEE ON CONSUMER & WORKER PROTECTION
Oversight Hearing
October 30th, 2025**

The NYC BID Association deeply appreciates the critical role that security guards play in enhancing public safety across the five boroughs. The heroism of Mr. Aland Etienne also needs to be acknowledged and celebrated by all New Yorkers, particularly those in the public safety industry.

As this proposed legislation acknowledges, there are already state laws in place that establish the minimum wage in New York City. The state is also responsible for regulating the licensure and training of security guards. It is also New York State that regulates minimum wages for private sector employees.

We are deeply concerned about the precedent this legislation sets in terms of city agencies establishing private-sector pay and benefits, and the potential impact on the overall business climate in New York City. Given the sweeping changes this legislation would engender, it requires further review to ensure we fully understand how it aligns with existing state requirements and laws.

We look forward to working with the City Council to keep New Yorkers safe and to support all first responders.



Testimony of Manny Pastreich, President of 32BJ SEIU
Committee on Consumer and Worker Protection
Int. 1391
October 30, 2025

SERVICE EMPLOYEES
INTERNATIONAL UNION
CTW, CLC

MANNY PASTREICH
President

JOHN SANTOS
Secretary Treasurer

ROXANA RIVERA
Assistant to the President

**EXECUTIVE VICE
PRESIDENTS**

KEVIN BROWN
JAIME CONTRERAS
ROB HILL
DENIS JOHNSTON
GABE MORGAN
KEVIN STAVRIS
CANDIS TALL

VICE PRESIDENTS

ANA MARIA HILL
ISRAEL MELENDEZ
HELENE O'BRIEN
ROCHELLE PALACHE
MICHAEL PISTONE
SAM WILLIAMSON

Capital Area District

Washington 202.387.3211
Baltimore 410.244.6299
Virginia 202.387.3211

Connecticut District

Hartford 860.560.8674
Stamford 203.674.9965

Mid-Atlantic District 1201

215.226.3600
215.923.5488
302.295.4814

Florida District

305.672.7071

Hudson Valley District

914.328.3492

Kentucky District

502.368.9122

New England District 615

617.523.6150

New Jersey District

973.824.3225

**Western Pennsylvania
District**

412.471.0690

www.seiu32bj.org

Good morning, Chair Menin and members of the Committee on Consumer and Worker Protection. My name is Manny Pastreich and I am the President of SEIU Local 32BJ. 32BJ is the largest building service union in the country, representing over 185,000 members up and down the East Coast and 85,000 in the New York City metro area. Our members are primarily immigrants and people of color, and make up the workforce of essential cleaners, door-people, airport workers, and other building service workers who keep our homes, workplaces, schools, and transportation hubs up and running. Our membership also includes roughly 20,000 security officers here in New York City, who stand on the frontlines of our city's crises and every day carry out the difficult and dangerous work of keeping New Yorkers safe. With our dedicated members, we fight to make our city a place where all working people can thrive.

32BJ strongly supports Int. 1391, which would raise job standards for New York City security officers. New York City already sets a wage, benefit, and paid leave floor for publicly contracted security officers¹ that ensures security contractors can provide compensation levels that attract and retain experienced workers, promotes healthy market competition between contractors, and delivers high security standards for the public. The state and city have also set baseline standards for security officers employed in subsidized development projects,² airports,³ critical infrastructure,⁴ and city-funded shelters.⁵ In the absence of a standard for the majority of the workforce, however, low bidders drive down industry standards, resulting in poor wages, minimal benefits and training, and low experience levels.

This bill would set a city-wide wage, benefit, and paid leave floor at the level necessary to attract and retain a qualified and experienced workforce. This would ensure an even playing field for contractors and guarantee a basic standard of living that can lift a low-wage, predominantly Black and Latino workforce out of poverty. It would also raise city-wide training requirements to ensure the skills, stability, and experience in the security workforce that all New Yorkers can count on.

Security officers are invaluable to New York City's public safety infrastructure.

New York City's private security officers are on the frontlines of nearly every type of emergency. They safeguard our homes and offices, prevent theft in our recovering retail districts, protect our cultural institutions and event spaces from weapons and violence, mitigate threats of terrorism, and deescalate agitated individuals to maintain order in our subways and public spaces. Due to the high demand for this

essential workforce, there are now more than two security guards for every NYPD officer in New York City, totaling 81,900 officers across the five boroughs.⁶

Despite their essential role, security guards are unsung in a city that has long stood by first responders. Poor wages and benefits, hazardous job conditions, and inadequate training have together produced a crisis of turnover in the workforce. A recent report finds that the NYC security industry suffers from a **77% annual turnover rate**⁷—meaning that over three quarters of the workforce leaves and is replaced each year. This constant churn saps workforce experience and risks undermining public safety in our city.

This bill aims to reverse the turnover crisis and further professionalize the workforce. In the highly outsourced, labor-intensive security sector, tough competition to win contracts drives employers to depress labor costs by keeping wages and benefits low. Security officers have countered this race-to-the-bottom by organizing unions and negotiating strong contracts, but **thousands of workers in New York City continue to make less than \$18 an hour**⁸ and lack meaningful benefits and protections.⁹

Poor job standards are unacceptable for officers who risk their lives every day protecting our city. The recent death of security officer **Aland Etienne**—who was fatally shot by a gunman at 345 Park Avenue, the building he had guarded for years—highlights the risks New York City security officers face every day. Mr. Etienne’s death—which came as he bravely defended the tenants of the office building—is an unimaginable loss for his family but, unfortunately, a risk all officers live with:

- Nationally, security guards face higher rates of fatal injuries than many other job categories¹⁰ and are over five times as likely as other occupations to need to take time off work due to violence-related injuries sustained on the job.¹¹
- Despite an ever-expanding set of responsibilities to mitigate new social crises and acts of violence like the shooting at 345 Park Ave., security guards may not receive training relevant to their facility or post, beyond the minimum level required for state licensing.¹²

This work has high stakes for both workers and the public. Security officers should be trained and fairly compensated for the risk they take on and New Yorkers should be able to count on high experience levels within this essential workforce.

The industry’s high turnover rates hurt security performance and threaten public safety.

The high risks and grueling nature of the job, combined with low pay and poor benefits, do not incentivize officers to remain in the profession when they can earn a comparable wage for less hazardous work. While thousands of security officers currently make less than \$18 an hour, hourly pay in New York City is currently listed as \$20 for a cashier at ALDI,¹³ \$23.50 for a delivery driver,¹⁴ and \$30.97 for a commercial cleaner,¹⁵ all of which require minimal to no prior experience. Indeed, many workers who take jobs as security officers do not stay in the job long, resulting in the industry’s exceptionally high turnover rate of 77%.

Experienced workers have greater skill levels in safe de-escalation, coordination of an effective evacuation or crisis response, and familiarity with a job site that allows them to spot intruders and suspicious activity and respond effectively to potential hazards.¹⁶ Unsurprisingly, research suggests that this high level of churn hurts security performance: among airport security screeners, researchers found that every 1% increase in screener turnover was associated with a 0.62% decrease in security breach detections, meaning that security breaches increased as turnover increased.¹⁷ Research on policing finds the same relationship between turnover and public safety: multiple studies have linked high turnover among police officers to increased crime rates.¹⁸

By requiring security employers to provide enhanced training to security officers, this bill could increase officer skills and preparedness.

New York City has a unique security landscape. Given the city's high density, highly trafficked transportation networks, and its status as a global epicenter for finance and diplomacy, FEMA identifies New York City as a top international target for terrorism.¹⁹ In the wake of two high-profile corporate shootings, including the 2024 killing of a UnitedHealthcare executive and the recent mass shooting at 345 Park Avenue, there is now also heightened concern for the security of the city's many high-profile corporations and the office buildings that house them.²⁰

Despite the sophisticated threats with which security officers in New York City must contend, the vast majority are subject to the same training requirements as officers in other parts of the state. A New York City-specific training standard that prepares workers to respond to a variety of crises, communicate effectively with the public, and protect themselves can raise security to levels necessary for a city of this size and status.

A security wage and benefit standard is a crucial investment in Black and Latino communities in New York City, who have been systematically denied opportunities for economic advancement.

New York City is the wealthiest city in the United States,²¹ yet a staggering one in four New Yorkers cannot meet their basic needs.²² The city's high poverty rate is heavily concentrated in communities of color. Centuries of racist housing, education, and criminal justice policies that have denied people of color opportunities to build intergenerational wealth have produced an extreme racial wealth gap in New York City.²³ As a result, the current median wealth is only \$2,800 for Black New Yorkers and \$0 for Latino New Yorkers, compared to a staggering \$320,000 for white New Yorkers.²⁴

These existing inequities are compounded by low-paying jobs available to Black and Latino communities – a reality reflected in the city's security workforce. In New York City, over 90% of security officers are non-white (51% identify as Black or African American, 28% as Hispanic or Latino, 5% as Asian, and 7% as other).²⁵ Despite the exceptionally low pay of the occupation, nearly half of New York City security guards have received some higher education.²⁶ This is consistent with

a worrying trend of an increasing number of college-educated workers competing for low-wage jobs.²⁷

These statistics overwhelmingly drive home the reality of New York City's shrinking middle class. A stunning 58% of New Yorkers currently make below a middle-class standard of living.²⁸ Notably, security is one of the largest occupations in the city.²⁹ By addressing standards in this industry, this bill helps ensure that tens of thousands of workers who are invaluable to the safety and prosperity of our city can themselves afford to raise a family here. It is a crucial investment in our public safety and communities.

New York City has the expertise to establish workforce standards to meet the unique needs of its residents and protect public safety.

The Department of Consumer and Worker Protection (DCWP) is an expert in advancing the rights of vulnerable workforces and already has the tools and know-how to develop appropriate compensation rates, enforcement mechanisms, and advocacy for a workforce like security guards.

- DCWP already enforces New York City's Fair Workweek Law to ensure fair scheduling practices for fast food and retail workers,³⁰ the city's Just Cause protections to ensure fair disciplinary and termination procedures for fast food workers,³¹ and the Freelance Isn't Free Act to ensure fair compensation for certain independent contractors.³²
- DCWP also has experience developing minimum rates for special workforces: since 2021, the agency has been empowered to determine and periodically publish appropriate minimum payment rates for third-party delivery workers in New York City using methods comparable to those prescribed in this law, such as studying the rates and conditions of covered workers through coordination with other agencies and offices, requesting or issuing subpoenas for data and documents from providers, and analyzing other information deemed relevant.³³
- In 2016 the city also created a dedicated Paid Care Division for homecare and domestic workers within DCWP to specifically focus on advancing the rights and quality of jobs of this workforce.³⁴
- The New York City Taxi and Limousine Commission (TLC) is another city agency that has effectively developed and enforced standards for a specific workforce. TLC investigates driver complaints and audits trip records on a regular basis to ensure that high-volume for-hire service drivers for companies like Uber, Lyft, and Juno receive a minimum per-trip payment standard that is fair and proportionate to the fees incurred by the driver.³⁵

New York and other jurisdictions have set wage requirements to accomplish similar public safety, social, and economic goals.

- Since 2008, Washington DC has set a higher wage and benefit rate for security officers stationed at office buildings in the district.³⁶
- In response to dire economic conditions faced by workers in the industry, New York raised the required wage for fast food workers above the minimum wage in 2015.³⁷

- In 2021, the state of Maryland passed the Secure Maryland Wage Act, which increased the minimum wage for workers at Washington Thurgood Marshall Airport and Pennsylvania Station. In justification of the law, the state said that “high turnover rates and inexperience... that result from low wages can hinder the ability of the employees to respond to emergency situations and put at risk the safety, security, and welfare of the residents of the State.”³⁸
- In 2021, both New York³⁹ and New Jersey⁴⁰ set wage and benefits requirements for airport workers employed at the high security locations of JFK, LaGuardia, and Newark Airports.
- To address high turnover, raise wages and benefits in the industry, and improve the quality-of-care patients rely on, New York also raised compensation standards for certain home care workers in 2022.⁴¹
- To expand economic opportunity, in 2023 Philadelphia launched a Quality Jobs Program that provides grants to employers that provide full-time jobs with living wages and benefits to residents of Philadelphia.⁴²
- California and Minnesota have both set higher wage standards for vulnerable workforces, including fast food workers and nursing home workers.⁴³

Now is the time for New York City to join other progressive cities and reclaim its authority to raise wage standards.

Contrary to prevailing wisdom, New York City likely has the authority to set a wage standard for security officers. In its 1963 *Wholesale Laundry* decision, the New York State Court of Appeals invalidated a minimum wage ordinance enacted by the city that set a rate higher than the state minimum wage, and based on that case, the common view has been that the city cannot pass local wage legislation. But *Wholesale Laundry* was a closely divided opinion, with 3 of 7 justices dissenting, and multiple intervening cases since increasingly indicate that the Court of Appeals is primed to overturn it.

Finally, **New York City is increasingly an outlier among other progressive cities in states with municipal home rule**, like New York State. Localities in Washington, California, New Mexico, Arizona, Colorado, Minnesota, Illinois, Maine, Delaware, Maryland, and the District of Columbia have all established local minimum wages at levels appropriate for their own economies.⁴⁴ This is an opportune moment for New York to join the list of cities and counties that have taken action to raise wage standards for working people and build a strong 21st century economy. For all these reasons, 32BJ SEIU strongly urges the passage of this bill. Thank you for your consideration.

¹ Labor Law Article 9; Real Property Tax Law §421-A NYC Admin. Code §6-130.

Available at <https://comptroller.nyc.gov/wp-content/uploads/documents/BuildingServiceEmployeeSchedule-2025-2026.pdf>

² NYS Real Property Tax Law §§ 421-A, § 467-A, 467-M, 485.

³ Healthy Terminals Act, NYS Labor Law Article 19-D.

⁴ NYS Public Service Law 42-A.

⁵ NYC Admin. Code §6-109.1.

- ⁶ Brick, Carmen, Lopezlira, Enrique, and Nari Rhee. "Demographic and Job Characteristics of NYC's Security Guard Workforce." UC Berkeley Labor Center. August 10, 2025. Available at <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>
- ⁷ Brick, Carmen, Lopezlira, Enrique, and Nari Rhee. "Demographic and Job Characteristics of NYC's Security Guard Workforce." UC Berkeley Labor Center. August 10, 2025. Available at <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>
- ⁸ NYS DOL: Occupational Wages for Security Guards. <https://dol.ny.gov/occupational-wages-0>
- ⁹ Survey data on file with SEIU 32BJ
- ¹⁰ Brick, Carmen, Lopezlira, Enrique, and Nari Rhee. "Demographic and Job Characteristics of NYC's Security Guard Workforce." UC Berkeley Labor Center. August 10, 2025. Available at <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>
- ¹¹ Bureau of Labor Statistics: Annualized Incidence rates of nonfatal occupational injuries and illnesses by occupation and case types.
- ¹² Brick, Carmen, Lopezlira, Enrique, and Nari Rhee. "Demographic and Job Characteristics of NYC's Security Guard Workforce." UC Berkeley Labor Center. August 10, 2025. Available at <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>
- ¹³ See https://www.indeed.com/viewjob?jk=c4367ac659d7a5f6&from=shareddesktop_copy
- ¹⁴ <https://www.indeed.com/viewjob?jk=5805ba2b3598f9bc&tk=1j5oru5gu2mdq00c&from=serp&vjs=3>
- ¹⁵ <https://comptroller.nyc.gov/wp-content/uploads/2025/07/BuildingServiceEmployeeSchedule-2025-2026.pdf> see Building Class "A" Cleaner/Porter, Elevator Operator, Exterminator, Fire Safety Director
- ¹⁶ See, for example, Gallear, Amanda. "The Impact of Wages and Turnover on Security and Safety in Airport." UC Berkeley Labor Center. October 18, 2017. <https://laborcenter.berkeley.edu/pdf/2017/SFO-literature-review.pdf>
- ¹⁷ Gallear, Amanda. "The Impact of Wages and Turnover on Security and Safety in Airport." UC Berkeley Labor Center. October 18, 2017. <https://laborcenter.berkeley.edu/pdf/2017/SFO-literature-review.pdf> page 4.
- Reich, Michael, Peter Hall, and Ken Jacobs. 2003. Living Wages and Economic Performance: The San Francisco Airport Model. Institute of Industrial Relations, University of California, Berkeley. <http://laborcenter.berkeley.edu/living-wages-and-economic-performance-the-san-francisco-airport-model/>
- ¹⁸ Hur, Yongbeom. "Turnover, voluntary turnover, and organizational performance: Evidence from municipal police departments." *Public administration quarterly* (2013): 3-35. Available at <https://www.jstor.org/stable/24371987>
- Kim, Eon, Kate Bowers, Dan Birks, and Shane D. Johnson. "Size isn't everything: Understanding the relationship between police workforce and crime problems." *Journal of Criminal Justice* 95 (2024): 102291. Available at <https://www.sciencedirect.com/science/article/pii/S0047235224001405#s0085>
- ¹⁹ https://www.fema.gov/sites/default/files/documents/fema_nyc-case-study_2019.pdf
- ²⁰ Najmabadi, Shannon, Margot Amouyal, and Aaron Gregg. "NYC mass killing raises new security concerns for corporate America." Washington Post. July 30, 2025. Available at <https://www.washingtonpost.com/business/2025/07/30/building-security-nyc-shooting-luigi-mangione/>
- ²¹ <https://www.henleyglobal.com/publications/usa-wealth-report-2025/top-10-wealthiest-cities-usa>
- ²² "ANNUAL THE STATE OF POVERTY AND DISADVANTAGE IN NEW YORK CITY." Robin Hood Foundation. Winter 2025. Available at https://robinhood.org/wp-content/uploads/2025/02/PT_Annual24_final_digital.pdf
- ²³ "The Racial Wealth Gap in New York." New York City Comptroller: Brad Lander. December 6, 2023. Available at <https://comptroller.nyc.gov/reports/the-racial-wealth-gap-in-new-york/>
- ²⁴ Koutavis, Anastasia, Collyer, Sophie, Jia, Yajun, and Christopher Wimer. "Spotlight on: The Racial Wealth Gap in New York City." Robin Hood Foundation. February 2025. Available at <https://robinhood.org/reports/poverty-tracker-spotlight-racial-wealth-gap-january-2025/>
- ²⁵ Brick, Carmen, Lopezlira, Enrique, and Nari Rhee. "Demographic and Job Characteristics of NYC's Security Guard Workforce." UC Berkeley Labor Center. August 10, 2025. Available at <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>
- ²⁶ Brick, Carmen, Lopezlira, Enrique, and Nari Rhee. "Demographic and Job Characteristics of NYC's Security Guard Workforce." UC Berkeley Labor Center. August 10, 2025. Available at <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>
- ²⁷ "Talen Disrupted: College Graduates, Underemployment, and the Way Forward." Burning Glass Institute. February 2024. Available at <https://static1.squarespace.com/static/6197797102be715f55c0e0a1/t/65fb306bc81e0c239fb4f6a9/1710960749260/Talen+Disrupted+03052024.pdf>
- ²⁸ "ANNUAL THE STATE OF POVERTY AND DISADVANTAGE IN NEW YORK CITY." Robin Hood Foundation. Winter 2025. Available at https://robinhood.org/wp-content/uploads/2025/02/PT_Annual24_final_digital.pdf
- ²⁹ ACS 1-Year Estimates Public Use Microdata Sample (2023) all Occupations in New York City PUMAs. Available at [Data.census.gov/mtat](https://data.census.gov/mtat)
- See also Brick, Carmen, Lopezlira, Enrique, and Nari Rhee. "Demographic and Job Characteristics of NYC's Security Guard Workforce." UC Berkeley Labor Center. August 10, 2025. Available at <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>
- ³⁰ <https://www.nyc.gov/site/dca/workers/workersrights/retail-workers.page>
- ³¹ <https://www.nyc.gov/site/dca/workers/workersrights/fastfood-retail-workers.page>
- ³² <https://www.nyc.gov/site/dca/workers/workersrights/freelancer-workers.page>
- ³³ NYC Admin Code § 20-1522
- ³⁴ See 2016 Local Law No. 98 <https://intro.nyc.gov/local-laws/2016-98>
- See also: <https://www.nyc.gov/site/dca/workers/workersrights/paid-care-workers.page>
- ³⁵ <https://www.nyc.gov/site/tlc/about/driver-pay-drivers.page>
- ³⁶ Code of the District of Columbia § 32-1003 (h)

³⁷ <https://dol.ny.gov/history-minimum-wage-new-york-state>

³⁸ MD Labor Law. § 3-1601 et seq.

MD Fair Wage Act of 2023 available at <https://mgaleg.maryland.gov/mgawebsite/Legislation/Details/sb0555?ys=2023RS>

³⁹ NY Labor Law Article 19-D.

⁴⁰ N.J.S.A 34:11-56.58 et seq.

⁴¹ NY Public Health Law § 3614-f. See also <https://dol.ny.gov/system/files/documents/2024/12/p105-home-health-aide-10-23-24.pdf>

For justification see: <https://www.humancareny.com/blog/what-is-new-york-fair-pay-for-home-care>

⁴² “Quality Jobs Program.” City of Philadelphia. Available at <https://www.phila.gov/programs/quality-jobs-program/>

⁴³ “Fast Food Minimum Wage Frequently Asked Questions.” State of California Department of Industrial Relations. Available at

<https://www.dir.ca.gov/dlse/Fast-Food-Minimum-Wage-FAQ.htm>

“Nursing Home Workforce Standards Board.” Minnesota Department of Labor and Industry. Available at <https://www.dli.mn.gov/about-department/boards-and-councils/nursing-home-workforce-standards-board>

⁴⁴ Workers’ rights preemption in the U.S. A map of the campaign to suppress workers’ rights in the states.” EPI. Available at

<https://www.epi.org/preemption-map/>

See also: “Inventory of US City and County Minimum Wage Ordinances.” UC Berkely Labor Center. Updated July 1, 2025. Available at <https://laborcenter.berkeley.edu/inventory-of-us-city-and-county-minimum-wage-ordinances/#s-1>

PRESIDENT
Yvonne Armstrong

SECRETARY TREASURER
Veronica Turner-Biggs

SENIOR EXECUTIVE VICE PRESIDENTS
Charles Nystrom
Nadine Williamson

EXECUTIVE VICE PRESIDENTS
Jacqueline Alleyne
Michael Ashby
Lisa Brown
Andy Cassagnol
Roger Cumberbatch
Adekemi Gray
Todd Hobler
Leigh Howard
Benson Mathew
Cari Medina
Brian Morse
Roxey Nelson
Rona Shapiro
Greg Speller
Daine Williams

VICE PRESIDENTS AT LARGE
Shaywaal Amin
Dreana Bellamy
Cody Denari
Anthony Garcia
David Greenberg
Tyrek Lee
Anthony Peterson
Lystra Sawney Campbell

VICE PRESIDENTS
Madeline Bovain
Lorraine Brown-Zanders
Evelyn Campos
DeQuaisa Canales
Patrick Clarke
Kareem Cooper
Mark Criswell
Raymont Dorsey
Marie Elder
Harold Fong-Sam
Vladimir Fortunny
Nicholas Franklyn
Julia Gittens
Kim Gooden
Katia Guillaume
Rebecca Gutman
Farah Hargett
Tracey Harrison
Carietta Heirs
Coleen Hemmings
David Kwai Ho
Sharon Hunter
Orville James
Keith Joseph
Rafael Justo
LaTanya King
Nicholas Kojowski
Angela Lane
Kevin Lookhart
Kathleen Loper
Janelle Manigault
Donta Marshall
Erica Michaud
Maurice Mintz
Robert Morris
Anita Morrison
Margarette Nerette
Jennifer Ortiz-Patton
Taren Peterson
Taleisha Reid
Danielle Ringgold
Lena Rodriguez
James Scordato
Joy Scott
Berta Silva
Josh Silver
Nick Smith
Brenda Spry
Cory Symms
Julio Vives
Marlon Washington
Sharon Whitter
Mary Wilsie
Patricia Wilson
Ray Wilson
Sui Ling Xu
Grace Bogdanove
Veloria Nepier

GENERAL COUNSEL
Pamela Jeffrey

CHIEF FINANCIAL OFFICER
Lucy Chen



Hearing Testimony Support for Int 1391-2025 (Adams)

Good Morning Members of the City Council,

On behalf of 1199SEIU's 300,000 New York members, I would first like to thank the City Council Committee on Consumer and Worker Protection for holding this hearing on the ***Aland Etienne Safety & Security Act*** sponsored by Speaker Adrienne Adams.

This legislation will help improve safety standards, pay, and training for security guards in New York City. 1199SEIU is here today to stand in solidarity with security guards fighting for a living wage, better benefits and protections, and proper training.

This bill, introduced in honor of Aland Etienne, who was killed during a mass shooting while on duty in a building on Park Avenue, is a step forward to help address the challenges security personnel in the city face every day.

As a union representing thousands of healthcare workers, we know how important it is to go to work every day and be certain that we are well paid, safe, and listened to. Workers deserve these guarantees. Anything less is dangerous and tells the worker that they and their profession are not valued.

Security officers also play very pivotal role in maintaining a safe and secure environment in healthcare facilities across the city. They are often the first line of protection for patients, visitors and the frontline workers providing care in these facilities.

By passing the Aland Etienne Safety and Security Act, we can show every security guard working in New York City, that the city has their back. We need to uplift thousands of working New Yorkers to the standards that we at 1199SEIU and other unions have fought for and won.

We appreciate the attention the City Council is bringing to this important issue and hope the city lives up to the moniker of being a union town by passing *Aland Etienne Safety & Security Act* and supporting the security personnel working to keep us safe.

Contact:
Tori Newman Campbell
Legislative Coordinator
Tori.newman@1199.org

498 7th Avenue
New York, NY 10018
(212) 582-1890
www.1199seiu.org

HICKSVILLE
100 Duffy Ave., Suite 300 West
Hicksville, NY 11801
Tel. (516) 542-1115
Fax (516) 542-0919

NEW JERSEY
555 Route 1 South, Suite 301A
Iselin, NJ 08830
Tel. (732) 287-8113
Fax (732) 287-8117

MASSACHUSETTS
108 Myrtle Street, 4th Fl.
Quincy, MA 02171
Tel. (617) 284-1199
Fax (617) 474-7150

ROCHESTER
259 Monroe Ave., Suite 220
Rochester, NY 14607
Tel. (585) 244-0830
Fax (585) 244-0956

BUFFALO
2421 Main Street, Suite 100
Buffalo, NY 14214
Tel. (716) 982-0540
Fax (716) 876-0930

SYRACUSE
250 South Clinton Street, Suite 200
Syracuse, NY 13202
Tel. (315) 424-1743
Fax (315) 479-6716

FLORIDA
2881 Corporate Way
Miramar, FL 33025
Tel. (305) 623-3000
Fax (305) 826-1604

WHITE PLAINS
10 Bank Street, 7th Floor, Ste. 740
White Plains, NY 10606
Tel. (914) 993-6700
Fax (914) 993-6714

GOUVERNEUR
93 E. Main Street
Gouverneur, NY 13642
Tel. (315) 287-9013
Fax (315) 287-7226



**Written Comments to the New York City Council
Committee on Consumer and Worker Protection**

Hearing Topic:

INT 1391 - Establishment of compensation and training standards for security guards.

October 30, 2025

The Manhattan Chamber of Commerce represents thousands of businesses, from small storefronts to large institutions, who all agree that safety is a prerequisite for serving their communities. We share the goal of a safe city, which requires a professional and well-supported security workforce. However, we strongly oppose Introduction 1391.

This bill is a stark example of legislative overreach. It goes far beyond setting a simple wage. It empowers a city agency to act as a central planner for an entire private industry, dictating complex, one-size-fits-all schedules for wages, paid sick leave, paid vacation, paid holidays, and benefit supplements. This top-down approach removes all flexibility for businesses to compete or to offer benefit packages that might better suit their specific employees, imposing a rigid mandate on an incredibly diverse sector.

The consequences will be devastating for our city's economy. The costs for essential security services will skyrocket for every office building, retail store, cultural institution, non-profit, and residential co-op. This isn't just a commercial issue; it hits New Yorkers where they live and support their communities. It forces businesses into an impossible choice: pay these crippling new costs or cut back on the security hours that keep their staff, customers, and tenants safe.

These costs are not absorbed in a vacuum. They are a direct inflationary driver. They will be passed on immediately to commercial tenants in higher rents and to everyday New Yorkers in higher prices for literally everything—from a cup of coffee to a theater ticket. This bill is a direct-line driver of the very affordability crisis it purports to address, making it harder to live and work in our city.

Introduction 1391 is not an isolated proposal; it is the latest and most egregious addition to the "mandate maze" of complex, unfunded, and overlapping regulations that are choking this city's small businesses. For years, owners have told us they are drowning in paperwork and cumulative costs. This bill is a prime example of legislating in the dark, with no clear understanding of the full economic consequences.

Has this Council studied how many security jobs will be lost to automation or cuts? How many small businesses, already on the brink, will be forced to close? What is the projected cost increase for non-profits, and which of their services will be cut as a result?

We urge you to abandon this dangerous bill. Instead, we call on the Council to do what it has failed to do for years: adopt a formal, mandatory process for independent economic impact statements. Legislating based on good intentions is not enough. You must be required to see and understand the full impact of legislation on jobs, small businesses, and the broader economy *before* you vote, not after the damage is done. We need data-driven, responsible governance, not this.

Thank you.

REBNY Testimony | October 30, 2025

The Real Estate Board of New York to

The Committee on Consumer and Worker Protection Regarding Compensation and Training Standards for Security Guards

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY thanks the Committee for the opportunity to testify on Intro 1391, which, among other things, would establish minimum wage and benefit requirements and enhanced training standards for security guards.

The security sector in New York City is a highly-unionized industry and REBNY members are proud to be a major employer of unionized-security guards who are members of SEIU 32BJ. Collective bargaining is conducted between the Realty Advisory Board on Labor Relations (RABOLR), on behalf of owners and operators in the real estate industry, and SEIU 32BJ. Based on decades of collective bargaining, the real estate industry has been able to ensure that unionized security guards receive family-sustaining pay and benefits, and can access the high-quality training that they need to perform their jobs and succeed in New York City. The relationship between real estate employers and SEIU 32BJ is truly a model of best practices in labor-management relations and is a major contributor to the success of New York City's real estate sector.

Intro 1391 would, unfortunately, undermine the benefits that have been achieved through collective bargaining by mandating that all State-licensed security guards who are not already covered by an existing government labor standard must receive a minimum wage and benefit package. As proposed, the minimum wage and benefit rate would not be allowed to be less than the prevailing rate for security guards as established annually by the New York City Comptroller. Presently, that prevailing rate is the rate set in the collective bargaining agreement between the RABOLR and SEIU 32BJ. By making the minimum wage for the entire industry equivalent to the collectively-bargained wage rate, the legislation fundamentally undermines the value of collective bargaining and impermissibly intrudes on the collective-bargaining process.

In addition, a well-established body of law makes clear that municipalities in New York do not have the authority to set their own minimum wage rates. Under the long-standing precedent set in *Wholesale Laundry Bd. of Trade, Inc. v. City of New York*—which has been reaffirmed several times in recent years—the State has preempted the field of minimum wage regulation, and local governments cannot impose wage requirements that conflict with State law. As such, we respectfully submit that the City Council does not have the legal authority to enact such a requirement.

Thank you for your consideration of these points.

CONTACT:

Dev Awasthi

Vice President of Government Affairs

Real Estate Board of New York

dawasthi@rebny.com

Zachary Steinberg

Executive Vice President, External Relations and Advocacy

Real Estate Board of New York

zsteinberg@rebny.com



Communications Workers of America District 1 submits this testimony in support of Intro 1391 which would establish compensation and training standards for security guards in New York City. CWA District 1 represents 145,000 workers in 200 CWA local unions in New York, New Jersey, New England, and eastern Canada. CWA members work in telecommunications, health care, higher education, manufacturing, broadcast and cable television, commercial printing and newspapers, and state, local, and county government. District 1 represents 65,000 members in New York State.

According to MIT's living wage calculator, the living wage in the New York City metropolitan area for a single adult with no children is \$29.87 per hour, and up to \$32.85 per hour in Manhattan. And yet, thousands of security workers in New York City make less than \$18 an hour and lack meaningful benefits and protections. Nearly a third of security guards rely on SNAP – a program under constant threat from the federal government. Additionally, security guards face higher rates of fatal injuries than many other jobs and do not always receive the training necessary to perform their jobs safely.

Due to the industry's subpar compensation and training standards, there is high turnover – security workers who can earn the same wage for a less dangerous job often choose to do so. These workers are essential, and we must ensure they are compensated fairly to maintain this workforce.

In recognition of the important work these officers do, New York City sets a wage and benefit floor for public contracted security officers. In the private market, low bidders drive down industry standards; a dynamic that is inevitable without legal standards and union protections.

All New Yorkers rely on the crucial work these security workers do. The Aland Etienne Safety and Security Act will establish a minimum wage, paid sick leave, paid vacation leave, benefits supplements, and training requirements – standards all workers deserve. CWA District 1 is proud to support the security workers who keep us safe, and we urge the City Council to pass this legislation.



October 30, 2025

Committee on Consumer and Worker Protection, New York City Council
City Hall
New York, NY 10007

Re: Establishment of compensation and training standards for security guards.

Dear Committee Members,

My name is Tom Harris, and I am the President of the Times Square Alliance, the business improvement district that exists to make Times Square clean, safe, and desirable for all. On behalf of our organization and stakeholders, I want to start by thanking Chair Menin and the entire committee for elevating the critical role private security employees play in keeping our city safe, and I appreciate the opportunity to offer testimony today.

As a Business Improvement District (BID), the Times Square Alliance is responsible for providing supplemental security services to keep our neighborhood safe. We employ 35 public safety officers who patrol the district — running from 40th Street to 53rd Street between 6th and 8th Avenues — 24 hours per day. We are also a New York State licensed security guard training school. The Times Square Alliance already exceeds the pay, benefits, and training requirements detailed in this legislation; the majority of our workers have been with us over ten years. We continually invest and care for our staff, and we have an Employee Assistance Program to address their well-being. We strongly believe that security guards deserve just compensation, generous medical coverage, and comprehensive training given the demanding and essential nature of their work.

My concerns about this legislation should in no way indicate a lack of care for our staff but rather frustration that the Council feels that the Department of Consumer and Worker Protection (DCWP) — who, as noted by Chair Menin, failed to show up for this hearing, is better suited to look out for the needs of our workers than we are. No one cares more about our team than I do. The Times Square Alliance prioritizes the well-being of our staff and works very hard to protect our security officers.

It is critical that the Council understands that security programs are not all the same. Owners of private property have exclusive responsibility for the security of their buildings. Business Improvement Districts throughout the city supplement city services; the city has the primary responsibility for the safety of the public realm.

While we strongly agree that our benefits, pay, and training should remain competitive, for DCWP to have oversight of uniform “work and safety standards” regardless of the circumstances seems to be an overreach. Entities like BIDs monitor public spaces but do not have primary responsibility for their security. Our Public Safety Officers supplement and cooperate with the NYPD and other city entities—those city agencies have ultimate authority for neighborhood security. My specific concern is having DCWP involving itself in proscribed staffing levels. While it may be fair to ensure that a private venue or building of certain size should have a set number of security officers tied to occupancy, to do so in a public setting where we do not have primary responsibility would not be fair to business

improvement districts. Such a requirement could have the unintended consequence of BIDs moving away from providing vital security supplemental services at all.

In a perfect world I would suggest nonprofits like BIDs, assuming they meet certain pay, benefit, and training requirements, be excluded from this legislation. I would welcome the opportunity to discuss ways that we can ensure that the work of security officers is respected, valued, and well compensated while preventing municipal overreach possibly causing BIDs to scale back or eliminate this valuable supplemental service.

We thank the Council for taking on the important responsibility of protecting our city's workers.

Thank you,

A handwritten signature in black ink, appearing to read 'Tom Harris', with a stylized flourish extending to the right.

Tom Harris
President
Times Square Alliance

**Testimony to the New York City Council
Committee on Consumer and Worker Protection**

October 30, 2025

Ken Prashad, Senior Director of Compliance & Operations, A&H Security Services

Hello, my name is Ken Prashad, and I'm the Senior Director of Compliance & Operations at A&H Security Services, a locally based MBE security provider here in New York.

Raising the minimum wage for security guards across all sectors would make a big difference. It would help improve conditions for our employees, let us standardize billing rates for our clients, and create a more level playing field when bidding on new contracts.

From experience, whenever we're able to pay our guards more, we see better retention and overall performance. The challenge is that we can only go so high before getting underbid by low-road contractors and unfortunately, there are a lot of them in this industry. That leads to high turnover and forces us to constantly backfill roles with less experienced guards.

Providing security in NYC isn't easy. Two weeks ago, one of our security guards was escorting housekeeping into a room where a guest was refusing to leave. The guest became extremely irate and assaulted our security officer who was just trying to do his job. For more examples of situations like this all you need to do is turn on the news and you'll see plenty of stories of what these men and women deal with every day. They deserve fair and reasonable pay for the work they do keeping the city safe.



Establishing compensation and training standards for security guards:
Testimony before the New York City Council
Committee on Consumer and Worker Protection

Karla Walter
Senior Fellow, Economic Policy
Center for American Progress

October 30, 2025

Thank you, Council Member Menin and Members of the New York City Council Committee on Consumer and Worker Protection for this opportunity to testify. Today, I will provide context and support for legislation to adopt wage, benefit and training standards for building security guards in New York City.

My name is Karla Walter. I am a Senior Fellow for Economic Policy at the Center for American Progress. CAP is an independent, nonpartisan, and progressive education and advocacy organization dedicated to improving the lives of Americans through ideas and action.

I have conducted extensive research on how cities, states, and the federal government can uphold decent wage and benefit standards for workers and support a well-qualified workforce that delivers good results for the public.¹ Last month, my team released a report finding that low pay and poor benefits among security officers undermine workers' ability to make ends meet; fuel high industry-wide turnover; and reduce the retention of experienced, well-qualified workers.² In my testimony, I will situate the legislation in a national context and make three main points:

1. Security officers are paid stagnant wages and receive insufficient benefits.
2. Wage and benefits standards improve outcomes for workers and the public.
3. Introduction 1391 would expand on successful models and establish New York as a national leader.

Security officers are paid stagnant wages and receive insufficient benefits

Security officers perform essential services to keep people safe at office buildings, hospitals, government buildings, and corporate campuses. They also act as first responders in emergencies. Too often, however, security officers are paid low wages and do not receive employer-sponsored health benefits.

New Center for American Progress analysis shows that security officers' wages have flatlined over the past 15 years even as the cost of living has soared.³ In 2003, a typical security officer earned \$17.05 per hour in 2024 dollars, while the median security worker in 2022 earned two cents less at \$17.03 per hour. By comparison, the cost of rent grew by more than 14 percent over this period even when accounting for inflation.

Moreover, the analysis finds that approximately 40 percent of security officers do not receive employer-provided health insurance. The lack of access to health insurance forces a significant number of security officers to rely on Medicaid. According to ACS data, nearly 18 percent of all security officers were enrolled in Medicaid in 2023, compared with only 10 percent of private sector workers overall.⁴

Without local intervention, difficulty accessing affordable care will likely grow in the coming months. Many security workers will likely face greater insurance costs due to cuts in Medicaid funding under the recently passed One Big Beautiful Bill Act.⁵ A previous CAP analysis found that a worker supporting a family of four with Medicaid and earning \$33,000 per year—just below the median wage for a full-time security worker—will face up to \$1,650 in increased out-of-pocket insurance costs.⁶

Finally, poor compensation disproportionately affects Black and Hispanic guards, who account for most workers in the occupation but earn around 10 percent less per hour than white security officers.⁷

New research from the UC Berkeley Labor Center looking specifically at New York City echoes these findings of insufficient pay and benefits across the sector.⁸ According to the paper, security guards in NYC are earning a median hourly wage of \$20.29 per hour. That is less than half of what it would take for a worker to support themselves and one child in New York City, according to the MIT living wage calculator.⁹

Wage and benefits standards improve outcomes for workers and the public

Low wages and insufficient benefits contribute to high industry turnover. According to CAP analysis, in 2023, annual turnover among security officers reached nearly 51 percent nationwide.¹⁰ Yet, the annual turnover rate is even higher among New York City security guards, at 77 percent, according to the UC Berkely findings.¹¹

High turnover rates not only increase staffing costs as new workers need to be hired and trained but also diminish workers' ability to build skills that make them more effective on the job. In the security sector, ensuring a stable supply of well qualified workers is essential to the public welfare, as security workers are often called on to respond to health emergencies, fires, acts of violence and other types of disturbances.

Increasingly, security industry publications and consultants cite high turnover as leading to training gaps, increased error rates and a lack of experience during "high-stakes scenarios where quick, well-informed responses are required."¹² These same publications suggest that raising pay and improving benefits to retain well qualified workers.

Indeed, research demonstrates that wage, benefit and job quality laws help to boost the economic security of security officers and other workers, reduce turnover and promote high standards for the public. For example, one national study looking at the impact of wage standards on building service workers, finds that the laws support higher wages, increase rates of employer provided health insurance and help to narrow racial pay gaps.¹³

After the city of San Francisco instituted a wage standard for airport workers, annual turnover rates among security screeners fell from 95 percent to 19 percent and employers saved about \$4,275 per employee in restaffing costs.¹⁴ Employers also reported that the standard helped increase morale and improve indicators of security, performance and customer service.

Similarly, a review of state and local contracting practices by the National Employment Law Project found that the adoption of wage standards often decreases employee turnover, which leads to savings in re-staffing costs, a more productive workforce, and improvements to the quality of public services—thereby helping to offset the cost of such a standard.¹⁵

Introduction 1391 would expand on successful models and establish New York as a national leader.

Introduction 1391 would similarly help to improve the lives of workers across the city, reduce racial pay disparities and guarantee a well-qualified workforce that maintains public safety by establishing minimum pay, benefit and training standards for security guards.

The city's Department of Consumer and Worker Protection has significant experience in developing and enforcing standards for local workers. Moreover, by extending wage and benefits standards to security guards employed in the private sector, the proposal would build on the city's existing wage and benefit standard for security guards employed on government contracts, leased properties, and properties receiving tax incentives.¹⁶

Indeed, cities, states and the federal government have long established wage and benefits standards on government supported work to ensure that contracting and other sorts of government spending upholds basic standards and do not undercut market wages.

Increasingly, some cities and states are going further to extend occupationally specific wage standards in essential sectors where low-wages and poor working conditions are driving high turnover and undercutting workforce experience levels.

For example, the District of Columbia requires all security officers working in commercial office buildings in the city to be paid at least the total compensation—wages and benefits—that prevails in the sector.¹⁷ In justifying the law, the Council of the District of Columbia stated:

Any wage that is not sufficient to provide adequate maintenance and to protect health impairs the health, efficiency, and well-being of persons so employed, constitutes unfair competition against other employers and their employees, threatens the stability of industry, reduces the purchasing power of employees, and requires, in many instances, that their wages be supplemented by the payment of public moneys for relief or other public and private assistance.

Because of the law, District of Columbia security officers are entitled to at least \$19.39 per hour in wages plus an additional \$5.36 per hour in benefits or their cash equivalent.¹⁸

And in New York, the state requires that building service employees, including security guards, at major active energy generation facilities or at critical infrastructure transmission or distribution facilities be paid at least the prevailing wage and benefit rate.¹⁹ Among the justifications for the law is that it can help ensure the security of critical infrastructure by reducing turnover and allowing for a more developed and trained workforce. The state has also established minimum pay standards for homecare, airport and fast-food workers.²⁰

In occupations outside of security, California sets a compensation standard for registered apprentices on private construction projects based on the state prevailing wage.²¹ And several states (California, Colorado, Michigan, Minnesota, New York, and Nevada) and three cities have (Seattle, Detroit, and Philadelphia) established industry standards boards that bring together representatives of workers, employers, and government to help set and enforce minimum workplace standards—including wages, hours, training, and safety—for an entire sector of the economy, such as fast food, nursing homes, home care, or agriculture.²²

Conclusion

Security officers fulfill a crucial role protecting businesses and the public but are paid low wages and offered few benefits. These problems force workers to depend on public services for basic needs such as health insurance and drive high turnover rates that can ultimately endanger the public. While New York City is often a leader in adopting policies to promote decent standards for its workforce, it is failing front line private security officers. Pro-worker policies such as Int. 1391's wage, benefit and training standard can help alleviate these problems, ensure decent pay and standards across the industry, and reestablish the city as a national leader.

Endnotes

¹ See, for example: Karla Walter, “Government on Workers’ Side: How State and Local Policymakers and Advocates Can Raise Standards for Publicly Supported Work,” (Washington, DC: Center for American Progress, 2024) available at <https://www.americanprogress.org/article/government-on-workers-side/>; Karla Walter, “Strong Prevailing Wage Standards Help America’s Economy and Workers,” *Wisconsin State Journal*, October 21, 2023, available at https://madison.com/opinion/column/karla-walter-strong-prevailing-wage-standards-help-americas-economy-and-workers/article_537b6dbc-4c82-5b6a-8135-50dbc914e8de.html; Aurelia Glass and Karla Walter, “Too Many Airport Service Workers Earn Low Wages and Benefits,” (Washington, DC: Center for American Progress, 2025), available at <https://www.americanprogress.org/article/too-many-airport-service-workers-earn-low-wages-and-benefits/>; Karla Walter, “How State Spending Can Create a Good Jobs Economy,” (Washington, DC: State Innovation Exchange, 2025) available at <https://stateinnovation.org/wp-content/uploads/2025/03/How-State-Spending-Can-Build-a-Good-Jobs-Economy-State-Innovation-Exchange-1.pdf>.

² Aurelia Glass, “Low Standards Hurt Security Officers’ Ability to Make Ends Meet,” (Washington, DC: Center for American Progress, 2025), available at <https://www.americanprogress.org/article/low-standards-hurt-security-officers-ability-to-make-ends-meet/>.

³ Ibid.

⁴ Ibid.

⁵ One Big Beautiful Bill Act, H.R.1, 119th Cong., 1st sess. (July 4, 2025), available at <https://www.congress.gov/bill/119th-congress/house-bill/1>.

⁶ Andrés Argüello and Andrea Ducas, “House Republicans’ Big, ‘Beautiful’ Bill Would Make Health Care More Expensive for Americans With Medicare and Other Insurance” (Washington: Center for American Progress, 2025), available at <https://www.americanprogress.org/article/house-republicans-big-beautiful-bill-would-make-health-care-more-expensive-for-americans-with-medicare-and-other-insurance/>.

⁷ Glass, “Low Standards Hurt Security Officers’ Ability to Make Ends Meet.”

⁸ Carmen Brick, Enrique Lopezlira, and Nari Rhee, “Fact Sheet: Demographic and Job Characteristics of NYC’s Security Guard Workforce,” (Berkeley: UC Berkeley Labor Center, 2025) available at <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>.

⁹ Massachusetts Institute of Technology, “Living Wage Calculation for New York County, New York,” available at <https://livingwage.mit.edu/counties/36061>.

¹⁰ Glass, “Low Standards Hurt Security Officers’ Ability to Make Ends Meet.”

¹¹ Brick, Lopezlira, and Rhee, “Fact Sheet: Demographic and Job Characteristics of NYC’s Security Guard Workforce.”

¹² El Dorado Insurance Agency, “The Hidden Costs of Turnover: How Employee Retention Reduces Risk for Security Firms,” November 18, 2024, available at <https://www.eldoradoinsurance.com/security-industry-news/the-hidden-costs-of-turnover-how-employee-retention-reduces-risk-for-security-firms/> (last accessed August 2025). See also, TrackTik, “10 Strategies to Reduce Turnover Rates, Increase Engagement, and Retain Your Security Officers,” May 17, 2024, available at <https://www.tracktik.com/blog/strategies-to-reduce-turnover-rates-increase-engagement-and-retain-your-security-officers/> (last accessed August 2025).

¹³ Frank Manzo and Robert Bruno, “The Impact of Service Contract Prevailing Wage Laws in the United States and Illinois: Effects on the Labor Market Outcomes of Janitors and Custodians” (La Grange, IL: Illinois Economic Policy Institute, 2021), available at <https://illinoiseipi.files.wordpress.com/2022/01/ilepi-pmcr-service-contract-prevailing-wages-final.pdf>.

¹⁴ Micheal Reich, Peter Hall, and Ken Jacobs, “Living Wages and Economic Performance: The San Francisco Airport Model” (Berkeley, CA: UC Berkeley Labor Center, 2003), available at <https://laborcenter.berkeley.edu/living-wages-and-economic-performance-the-san-francisco-airport-model/>. See also, Amanda Gallear, “The Impacts of Wages and Turnover on Security and Safety in Airports: A Review of the Literature” (Berkeley, CA: UC Berkeley Labor Center, 2017), available at <https://laborcenter.berkeley.edu/pdf/2017/SFO-literature-review.pdf>.

¹⁵ Paul K. Sonn and Tsedeye Gebreselassie, “The Road to Responsible Contracting: Lessons from States and Cities for Ensuring That Federal Contracting Delivers Good Jobs and Quality Services” (Washington: National Employment

Law Project, 2009), available at https://www.inthepublicinterest.org/wp-content/uploads/The_Road_to_Responsible_Contracting.pdf.

¹⁶ Labor Law Article 9, Real Property Tax Law, Section 421-A NYC Administrative Code §6-130, available at <https://comptroller.nyc.gov/wp-content/uploads/documents/BuildingServiceEmployeeSchedule-2025-2026.pdf>.

¹⁷ Compensation rates are set equal to the combination of minimum wage and fringe benefits required for the guard 1 classification under the Service Contract Act. Code of the District of Columbia, “Chapter 10. Minimum Wages,” available at <https://code.dccouncil.us/dc/council/code/titles/32/chapters/10/>

¹⁸ Department of Employment Services, “District of Columbia Security Officer Minimum Wage,” Announcement of July 1, 2024 to June 30, 2026 updated wage rates, available at:

<https://does.dc.gov/sites/default/files/dc/sites/does/publication/attachments/July%202025-June%202026%20Security%20MW%20Rate%20Notice.pdf> (last accessed October 2025).

¹⁹ New York Public Service Law Chapter 48, Article 2, Sec. 42-A, available at <https://www.nysenate.gov/legislation/laws/PBS/42-A>.

²⁰ New York State Consolidated Laws, Chapter 45, Section 3614-C available at:

<https://www.nysenate.gov/legislation/laws/PBH/3614-C>; Port Authority of New York and New Jersey, “Amended Rules for Implementation of Minimum Wage Policy for Non-Trade Labor Service Contracts—LaGuardia Airport, John F. Kennedy International Airport and Newark Liberty International Airport,” available at <https://www.panynj.gov/airports/en/minimum-wage-rules.html>; New York Department of Labor, “Minimum Wage for Fast Food Workers Frequently Asked Questions,” available at <https://dol.ny.gov/minimum-wage-fast-food-workers-frequently-asked-questions> (last accessed October 2025).

²¹ Cal. Code. Regs. §208, available at <https://www.law.cornell.edu/regulations/california/8-CCR-208>.

²² David Madland and Sachin Shiva, “Industry Standards Boards Are Delivering Results for Workers, Employers, and Their Communities,” (Washington, DC: Center for American Progress, 2024) available at <https://www.americanprogress.org/article/industry-standards-boards-are-delivering-results-for-workers-employers-and-their-communities/>.

**Testimony to the New York City Council
Committee on Consumer and Worker Protection**

October 30, 2025

Dennis Fan, Associate Clinical Professor of Law,
Columbia Law School

I want to thank Chair Julie Menin and the Committee on Consumer and Worker Protection for holding this hearing and for this opportunity to testify on the proposal to set standards for wages, benefits, sick leave, and other time off for security officers.

In particular, I want to address New York City's authority to raise its local minimum wage for security officers, as well as the legal history and doctrine around raising the City's wage. That history leaves City Council room to push forward with its proposal.

New York City's First Local Minimum Wage and *Wholesale Laundry*

New York City's broad home-rule powers are, of course, at their apex when it comes to managing public safety. We regrettably do not live in a society that is free from acts of violence or other risks, but at the same time, it seems infeasible and inadvisable to count on enlisting a local police force that is so expansive that it could mediate or prevent these risks at all times.

In my mind, security officers keep residents safe in the same way a police force might. That policy judgment to rely on security officers is significant when we think about the City's powers—though what the Council is weighing is a wage increase, the basic goal should be seen as one of safety. And that local need for safety is especially great in the most densely populated city in the country.

Even when it comes to matters that the City would normally have the power to carry out, there is still a concern that a state statute might *preempt* the City's local reform. That is, the New York Constitution sets out that a local law cannot be "inconsistent" with a general law from the Legislature.

There is some legal history here. New York State passed its statewide minimum wage in 1960, enacting a Minimum Wage Act that set the minimum at \$1. Pretty soon after, in 1962, New York City realized that this was not enough, and the City passed its own

\$1.25 wage for local employees that would go up to \$1.50 the following year. Industry groups sued the City, which gave rise to a case that we call *Wholesale Laundry*.

Now, *Wholesale Laundry* is classically misunderstood for the proposition that municipal governments cannot raise their minimum wage. There, the Appellate Division, First Department held that the City's wage was invalid for two separate reasons.

First, the Appellate Division said, the City's wage is in direct conflict with the wage set in the State's Minimum Wage Act, which is what we call conflict preemption. Second, the Appellate Division held that the State's legislative actions precluded *all* wage regulations from local governments, which is what we call field preemption, when a city is blocked from legislating on a whole subject matter. *See Wholesale Laundry Bd. of Trade v. City of New York*, 17 A.D.2d 327 (1st Dep't 1962).

These are generally two distinct doctrines, which I will get to later. But the Court of Appeals affirmed in a sharply divided, 4-3 decision, without issuing an opinion and over two written dissents. *See* 12 N.Y.2d 998 (1963).

The Diminishing Legal Significance of *Wholesale Laundry*

I say that *Wholesale Laundry* is misunderstood, because, normally, when the Court of Appeals affirms without an opinion, we read its decision narrowly. That is, we would interpret the Court as agreeing in the *result* that the City's then-existing \$1.25 wage was preempted but not as agreeing with the lower court's *reasoning* of either conflict or field preemption. The Court has said time again that when it affirms without an opinion, it is not giving "an implied approval" of any rationale below. *Sentry Ins. Co. v. Amsel*, 36 N.Y.2d 291, 295 (1975).

This makes a lot of sense. With a 4-3 decision, it might have been the case that *neither* the conflict-preemption nor the field-preemption rationale garnered the votes of the majority of the Court. The Court may have easily been split further, so that only two judges agreed with each preemption rationale, and three judges thought that the City could legally pass a minimum wage. Put another way, perhaps it is that a majority of the Court *never* figured out why a local minimum wage would be preempted.

To be bound by the result of a case but not the reasoning of a case just means that the City could not go ahead with the same exact thing that it did in 1962 in the face of the State's then-existing statutes. There is a great example of this principle. Believe it or not, two years later in 1964, the City tried to pass a \$1.50 wage *again*. The trial court

said that there was “nothing new” that had changed in this law and so struck it down, and the result was eventually affirmed by the Court of Appeals. This time, the Court’s order did not even have any noted dissents, presumably because this was the exact same case.

Whatever we think about the City’s 1962 and 1964 enactments, the legal landscape has changed so much that it is hard to see how *Wholesale Laundry* binds this Council anymore. I want to outline how things are different on both the State’s side and the City’s side, and also how legal doctrine has shifted.

First, the State’s Minimum Wage Act has changed. Most notably, the Act as of 2016 specifies a minimum wage specifically for New York City. The Constitution and Municipal Home Rule Law prohibit local laws that are “inconsistent” with *general* laws of the State. But there is at least an argument that the State’s minimum wage for the City is in fact now a *special* law, because it applies to only to the City, and the City has greater authority to supersede a special law with its own enactments.

But even if the Minimum Wage Act were not a special law, the enactment of separate minimum wages for New York City, downstate, and the rest of the State is notable from a legal standpoint. It means that the Legislature has *accepted* the fact that there would be variation in the local wage when it comes to the City. What preemption doctrine, as I will get to later, tries to prevent is unintended disuniformity. But where there is already that disuniformity, passing a local minimum wage would not change that feature of the State’s legal structure.

Second, the City’s current proposal is far different than the local laws passed 60 years ago. The City very well could attempt another citywide increase to its local minimum wage, but the present proposal is aimed at a particular safety risk (rather than general economic conditions) and motivated by a desire to protect public safety (rather than only economic wellbeing).

Part of what made the City’s 1962 local minimum wage in *Wholesale Laundry* offensive to the Court of Appeals was likely a feeling that it was a bare revision of an economic judgment that the State had made. That is, no court that reviewed the local wage back then opined that there was a serious *need* for a City wage, separate and apart from what the State had put forward.

Times have changed significantly. The City is not only, more than it ever was, the economic engine of the State. But there are also now unique public safety, housing, transportation, and business issues that accompany the major metropolitan center.

A Local Minimum Wage Under Current Doctrine

I would stress that current legal doctrine has also shifted. Even if we thought that the force of *Wholesale Laundry* were greater, it has become clear over time that both of the rationales that it *could have* stood for have now been rejected.

The first concern is conflict preemption, which is what happens when state and local law are inconsistent. The Appellate Division in *Wholesale Laundry* thought that a local wage was preempted because it barred what state law allowed. That is, the Minimum Wage Act allowed employers to pay \$1 an hour, and New York City's minimum wage barred that from happening locally.

This is just not how conflict preemption works anymore. The Court of Appeals has itself criticized *Wholesale Laundry*'s conception of conflict preemption as "much too broad." *People v. Cook*, 34 N.Y.2d 100, 109 (1974). By definition, all local regulation happens on top of state regulation. When a locality decides to regulate, it means that something that the State once permitted is now prohibited.

Rather, conflict preemption now starts with the intent of the Legislature to prohibit a local enactment, and that is a question principally about the text of the Minimum Wage Act. Neither the Court of Appeals nor any other court has in fact *ever* picked apart the text of that statute.

If they had, what those courts would see is not a bare desire for the Minimum Wage Act to block out all possible other wages. The Act instead repeatedly states that there could be a "greater, such other wage" from other legal sources. And as I mentioned, the structure of the Act—with a specific wage set for New York City—accepts the possibility of some local variance in the City. The Legislature's recognition that there could be fluctuation in the statewide wage cuts sharply against the notion of conflict preemption.

The second concern is field preemption, which is what happens when the State has precluded all possibility of local regulation on a subject matter. Here, the Court of Appeals made it quite clear just a year after *Wholesale Laundry* that the State was not cutting local government out of the business of minimum wages entirely. The Court said that the City could raise the minimum wage for its own employees. *McMillen v. Browne*, 14 N.Y.2d 326, 332 (1964).

That holding was completely correct, and a real retreat from the logic of *Wholesale Laundry*. The Constitution grants localities the power to alter the wages for their own employees. But that legal authority necessarily means that the State never meant for cities to be stopped from *all* wage regulation, which is what needs to happen for there to be field preemption. Field preemption, if you can imagine, applies when a federal or state government is the exclusive authority for a subject matter—like with federal nuclear plants or state electrical plants.

Notably, all sorts of laws affecting employment relationships are not field preempted. That includes the City’s antidiscrimination laws, for instance. And the Appellate Division, First Department confirmed a few years ago that field preemption did not block the City’s Fair Workweek Law. The Fair Workweek Law, of course, adopted scheduling premiums that could be considered a form of wage supplements. But the Appellate Division held that there the State had not reserved to itself the entire field of wage regulation in a way that precluded those premiums. *International Franchise Assn. v. City of New York*, 193 A.D.3d 545 (1st Dep’t 2021).

* * *

All this means that the City Council has room to maneuver when thinking about a minimum wage. In my view, *Wholesale Laundry* has hardly any controlling force left. Even if we were worried about that case, that is not to say the City should not act. As U.S. Supreme Court justice recently put it, *stare decisis*—whether precedent should stay controlling—is not absolute but has “its own legal tests.” The vast shift in local wage regulation and in urbanization, and the crumbling foundations of *Wholesale Laundry*, are established *legal* reasons to pass a law that would let the Court of Appeals clarify its view under prevailing modern doctrine.

**Testimony to the New York City Council
Committee on Consumer and Worker Protection**

October 30, 2025

**LiJia Gong, Managing Director, Legal and Policy,
Local Progress Impact Lab**

I want to thank Chair Julie Menin and the Committee on Consumer and Worker Protection for holding this hearing and for this opportunity to testify on the proposal to set industry-specific labor standards for security officers.

I am here in my capacity as the Managing Director for Legal and Policy at Local Progress Impact Lab, a nonprofit organization that brings together local leaders, partners, and experts to build the knowledge, skills, and leadership needed to advance racial and economic justice at the local level. We work closely with a network of over 1500 local elected officials across the country—including right here in New York City—who are advancing some of the most innovative policies in the country to address the critical challenges we are facing as a city and nation.

In my testimony, I will address the emergence of localities as key players in advancing and protecting workers' rights across the country. Because of local expertise about industry-specific concerns, cities have often passed carefully crafted legislation to address those precise concerns. Additionally, my testimony will provide some context and history about home rule, which is enshrined in Article IX of the New York Constitution.

Cities as Engines of Innovation

Responding to increased inequality, degraded working conditions, and insufficient or inconsistent worker protections at the state and federal level, localities have in many cases joined states as the “laboratories” of experimentation—as Supreme Court Justice Louis D. Brandeis described—in relation to workplace matters. A number of localities have come to view protecting workers and improving their conditions as part of their core municipal function.

In recent years, localities have introduced numerous cutting-edge laws to address emerging challenges facing workers, and over 20 cities have established new offices devoted to enforcing those laws.

In many cases, as here, local legislation addresses urgent industry-specific concerns and conditions. For instance, in 2019, the City of Philadelphia enacted legislation to address the issues of safety, instability, and retaliation facing parking attendants. The legislation requires parking operators to demonstrate “just cause” to fire an employee and mandates that garages, lots and valet services have sufficient staffing to ensure the safety of employees and customers.

In the hospitality industry, cities have addressed safety issues like sexual harassment and assault, as well as low wages, through local legislation. For example, Chicago requires hotel employers to provide portable emergency contact devices—so-called “panic buttons—to workers, develop and comply with a sexual harassment policy, take safeguarding steps after receiving an allegation of harassment, and prohibit retaliation for reporting sexual harassment or assault. And at least four California cities—Los Angeles, Oakland, Santa Monica, and West Hollywood—have required a higher minimum wage for their hotel workers

It is no coincidence that many of these industry-specific policies address issues of public safety along with low wages and other working conditions. Ensuring public safety has long been a traditional local function, and cities are appropriately utilizing their local authority to respond to emergent public safety challenges that affect the public and workers alike. To that end, this bill will bring New York City in line with its peers leading the way across the country.

Home Rule

In New York, the Constitution of 1894 took the first step towards some form of constitutional home rule. New York was part of a wave of states that adopted home rule in this period. After the Civil War, rapid urbanization and growing populations in cities across the country led to movements to vindicate local authority, with reform efforts shifting from incremental constraints on the worst state abuses to a broader engagement with local power. The basic theory of this first wave of home rule was that state constitutions would empower cities to adopt charters and that cities that did so would be given the power to act with respect to what were considered “local” or “municipal” affairs. For a large and diverse state like New York, home rule is essential so that our cities, counties, villages, and towns can operate effectively and accountably.

Testimony of Cassandra Gomez

National Employment Law Project

**In Support of Int. No. 1391-2025:
Establishment of compensation and training standards for
security guards**

Hearing before the New York City Council

Committee on Consumer and Worker Protection

October 30, 2025

Cassandra Gomez
Senior Staff Attorney at NELP

National Employment Law Project
90 Broad Street, Suite 1100
New York, NY 10004

cgomez@nelp.org

Thank you, Chair Menin and members of the committee for the opportunity to testify today in support of Introduction number 1391-2025 regarding the establishment of compensation and training standards for security guards. My name is Cassandra Gomez, and I am a Senior Staff Attorney at the National Employment Law Project (NELP). NELP is a nonprofit legal, research, and policy organization that for more than 55 years has sought to strengthen protections and build power for workers in the U.S. Together with local, state, and national partners, NELP advances its mission through transformative legal and policy solutions, research, capacity-building, and communications. NELP has long advocated for strong wage standards and robust workplace protections, and as part of this work NELP regularly engages on worker rights issues pending before the New York City Council.

Introduction number 1391 would institute several important expansions for security guard workplace rights, including improved sick leave, paid time off, and standard benefits. Critically, the bill will also establish a minimum wage rate to be determined by the Commissioner pursuant to a Department of Consumer and Worker Protection study. Intro. 1391 is a long overdue local wage ordinance that will bring New York City in line with other major cities.

Local wage standards, such as Intro. 1391, allow local governments to meet the needs of their workforces.

Across the U.S., localities have enacted local wage standards to meet the needs of their work forces. Such local wage standards have shown to be an effective tool in tailoring job standards and workplace protections to local communities.

Local wage standards are an important way for local governments to ensure that workers in their area are properly compensated for their work. From housing costs to food costs, workers in cities often face much higher costs of living than workers in other areas of the state.¹ In a state with a diverse geography like New York, this cost differential is especially pronounced given that New York City is consistently cited as the most expensive city to live in in the U.S.² Taking housing as an example, in October 2025, the average cost of rent in New York City is \$4,030 per month.³ As many other localities across the country have recognized, local wage standards that exceed the floor set by state law are a common sense solution.

Further, local wage standards allow local legislative bodies to be responsive to the concerns and wills of their constituents without waiting on state legislatures, which may be slower to keep up. Currently, New York State law sets New York City's minimum wage at \$16.50 per hour.⁴ However, this wage rate is only around half of what the Economic Policy Institute estimates would constitute a living wage in most of the city's

boroughs,⁵ meaning the state floor does not go far enough to reflect the reality of the cost of living for New Yorkers. Under state law, New York City's minimum wage is set to reach an insufficient \$17 by 2026 and is expected to adjust with inflation beginning in 2027.⁶ Our City Council should act to increase local wages sooner, and Intro. 1391 is a great first step toward that.

Additionally, the landscape of local wage policymaking could not be more different than when *Wholesale Laundry* was decided over 60 years ago.⁷ Over the last decades, there has been an explosion in local wage activity, from just a handful at the beginning of the 21st century, to today nearly 70 cities and counties that have passed a higher local minimum wage better matched to their local economies and needs,⁸ policies that have proven to be one of the most effective means of reducing inequality. High-cost cities that have passed their own higher local minimum wage include Los Angeles, Seattle, San Francisco, Minneapolis, Denver, Chicago, Santa Fe, and Albuquerque.⁹ New York City truly is an outlier amongst its peers for not yet enacting a higher local minimum wage.

Many jurisdictions that have enacted local wage laws are like New York City in that their state laws are silent on wage preemption.

A number of jurisdictions that have adopted their own wage standards have done so even though their state laws are silent on wage preemption. Minneapolis and large counties in Maryland are among such localities, and in both Minnesota and Maryland, state courts have upheld local wage ordinances, ruling that they are not preempted by state law.¹⁰

Similarly to these jurisdictions, New York State's minimum wage law does not address whether it preempts local minimum wage laws.¹¹ As other panelists will explain, the caselaw that gave rise to preemption of local wage standards in New York, *Wholesale Laundry*, was a tenuous ruling that relies on assumptions that have been disproven over the succeeding decades.¹²

Intro. 1391 builds upon the New York City Council's record of establishing strong protections for workers in our city.

The New York City Council has already acted to establish vital local workplace standards for workers in our city—Intro. 1391 is a natural next step. For example, in 2021, the city enacted several ordinances to establish food delivery worker protections, including courier access to restaurant bathrooms and minimum payments per trip.¹³ In the years since, the City Council has taken important steps to expand upon those originally enacted protections.¹⁴ The City Council also enacted the Fair Workweek Law in 2017 to curtail unfair and unpredictable scheduling for fast food and retail workers.¹⁵ That law

has also been expanded upon in recent years to fortify worker protections and extend the scope of the ordinance to utility safety workers.¹⁶

Implementing workplace standards that exceed state law is also not new to New York. When the state adopted its own paid sick leave law in 2020, the city continued to implement its local paid sick leave law, which has been in effect since 2014.¹⁷ New York has also continued to improve our local paid sick leave law to further exceed the state's floor.¹⁸

Intro. 1391 would continue recent City Council actions by building out workplace standards for covered security guards.

Conclusion

New York has fallen behind other major cities that have enacted their own local wage standards and it is time to remedy this gap. We applaud the introduction of Intro. 1391, which will bring security guard wages closer to a living wage, and urge its passage.

About NELP

Founded in 1969, the National Employment Law Project (NELP) is a nonprofit advocacy organization dedicated to building a just and inclusive economy where all workers have expansive rights and thrive in good jobs. Together with local, state, and national partners, NELP advances its mission through transformative legal and policy solutions, research, capacity-building, and communications. NELP is the leading national nonprofit working at the federal, state, and local levels to create a good-jobs economy. Learn more at www.nelp.org.

Endnotes

- ¹ 2023 Consumer Expenditure Surveys, BUREAU OF LABOR STATISTICS, at Table 1721 (May 23, 2025), <https://www.bls.gov/cex/tables/calendar-year/mean-item-share-average-standard-error/cu-area-type-2023.xlsx>.
- ² Press Release – For Immediate Release – Q2 2025, THE COUNCIL FOR COMMUNITY AND ECONOMIC RESEARCH (Aug. 29, 2025), <https://www.coli.org/press-release-for-immediate-release-q2-2025/>.
- ³ Rental Market Trends in New York, NY, APARTMENTS.COM (Oct. 2025), <https://www.apartments.com/rent-market-trends/new-york-ny/>.
- ⁴ N.Y. Lab. Law § 652(1-a)(a).
- ⁵ Sebastian Martinez Hickey, A ‘\$30 by 2030’ Minimum Wage in New York City Is a Bold Proposal, ECONOMIC POLICY INSTITUTE (Aug. 28, 2025), <https://www.epi.org/blog/a-30-by-2030-minimum-wage-in-new-york-city-is-a-bold-proposal-the-first-step-is-giving-the-city-the-freedom-to-set-its-own-wage-floor/#:~:text=With%20the%20FBC%20cost%20data,living%20wage%20in%20San%20Francisco>.
- ⁶ N.Y. Lab. Law § 652.
- ⁷ See generally *Wholesale Laundry Bd. of Trade v. City of New York*, 17 A.D.2d 327 (1st Dep’t 1962).
- ⁸ Yannet Lathrop, *Local Minimum Wage Laws: Recent Trends and Economic Evidence*, NATIONAL EMPLOYMENT LAW PROJECT, at Table 3 (July 2025), <https://s27147.pcdn.co/app/uploads/2025/01/City-Minimum-Wage-Recent-Trends-Economic-Evidence.pdf>.
- ⁹ *Id.*
- ¹⁰ *Graco, Inc. v. City of Minneapolis*, 937 N.W.2d 756 (Minn. 2020); *City of Baltimore v. Sitnick*, 254 Md. 303 (1969).
- ¹¹ N.Y. Lab. Law § 652.
- ¹² See generally *Wholesale Laundry Bd. of Trade v. City of New York*, 17 A.D.2d 327 (1st Dep’t 1962).
- ¹³ Claudia Irizarry Aponte & Josefa Velasquez, *New York City Passes Landmark New Protections for Food Delivery Workers*, THE CITY (Sept. 23, 2021), <https://www.thecity.nyc/2021/09/23/new-york-city-landmark-food-delivery-worker-law/>.
- ¹⁴ See *Three NYC Council Bills to Expand Protections for Delivery Workers and Advance Sustainable Delivery Industry Become Law, Even As Mayor Delays Safeguards for Grocery Delivery Workers by Vetoing Two Bills Supported by His Own Administration*, NEW YORK CITY COUNCIL (Aug. 14, 2025), <https://council.nyc.gov/press/2025/08/14/2939/#:~:text=The%20New%20York%20City%20Council%20passed%20a,co pies%20to%20contracted%20delivery%20workers%20upon%20request>.
- ¹⁵ *Fair Workweek Law*, NYC CONSUMER AND WORKER PROTECTION, <https://www.nyc.gov/site/dca/about/fairworkweek-deductions-laws.page> (last visited Oct. 29, 2025).
- ¹⁶ *Id.*
- ¹⁷ N.Y. Lab. Law § 196-b; NYC Code § 20-911 *et seq.*
- ¹⁸ For example, in 2021, the City Council temporarily amended the Earned Safe and Sick Time Act to provide for additional paid sick time for the purpose of helping children to receive and recover from vaccines. See *Additional Paid Leave for Child Vaccinations Goes Into Effect December 24, Available Retroactively to November 2*, NYC CONSUMER AND WORKER PROTECTION (Dec. 23, 2021), <https://www.nyc.gov/site/dca/news/049-21/additional-paid-leave-child-vaccinations-goes-effect-december-24-available-retroactively>.

**New York City Council Hearing
Committee on Consumer and Worker Protection
Intro. 1391 – Aland Etienne Safety and Security Act
October 30, 2025**

**Testimony in Support of Intro. 1391
Submitted by the New York State Nurses Association**

The New York State Nurses Association (NYSNA) represents more than 42,000 RNs for collective bargaining and strongly supports universal access to high quality care for all New Yorkers. NYSNA is a leading advocate for ensuring that healthcare workers, including security guards employed in hospitals and other healthcare settings, are fairly paid, have good benefits, and enjoy working conditions on the job that promote recruitment and retention and workforce stability.

The proposed legislation would address poor pay, insufficient benefits, and bad working conditions that drive high turnover rates and undermine the stability of the security guard workforce. Given the critical role of security guards in protecting the safety of workers, patients and the general public in healthcare settings and across almost every other sector or industry, NYSNA strongly supports this legislation.

Intro. 1391 would address benefits and poor working conditions among security officers by requiring the City of New York to direct the Department of Consumer and Worker Protection (DCWP) to establish and enforce minimum wage, paid sick leave, paid vacation leave, health care benefits, and training requirements for security guards and security guard employers. The legislation would also require the DCWP establish an advocacy office to oversee working conditions and to educate security guard employers and workers about their obligations and rights. Finally, the proposed legislation would establish an enforcement mechanism to assist security guards in submitting complaints regarding potential violations, track the status and outcome of such complaints, and coordinate with appropriate stakeholders to monitor and oversee ongoing issues affecting the security workforce.

The need for this legislation is made obvious by the data on horrible conditions facing the security guard workforce. Security guards are poorly paid, with wages that are in many cases below or barely above the poverty level.

According to data produced by the City Council and a range of academic and union studies, security guards in New York City private industries, many of whom are employed by non-union for-profit subcontractors, earn a median wage of less than \$21/hour, and 90% of the workforce makes less than the standard for a living wage in New York City. Almost 22% of the workforce earns less than 200% of FPL. About 40% of the security guard workforce work for employers that do not provide health insurance coverage, forcing them to go without healthcare or to rely on Medicaid, the Essential Plan or other government subsidized programs for their healthcare. Because of the low pay and lack of benefits, annual turnover rates in the security guard workforce are estimated to exceed 77%.

We also note that the security workforce is subject to racial, class and gender inequities that further stratify the overall workforce. More than 80% of the 80,000 security guards in the workforce in New York City are people of color and 45% are immigrants. Women, immigrants and people of color in the workforce are disproportionately concentrated in the low end of the wage scale. By setting minimum pay and benefit standards, this legislation will disproportionately impact these most exploited security workers and address discrimination and equity in the broader workforce.

Nurses and other healthcare workers face working conditions that are similar to those faced by security guards, with levels of workplace violence and injury rates that are much higher than other titles and professions, poor working conditions, and other stressors that contribute to high turnover rates and difficulties in recruitment and retention.

Given the critical role of security guards in preventing workplace violence and ensuring the safety of patients, nurses and other workers, NYSNA strongly supports enactment of Intro. 1391. Our security guards need and deserve fair pay, good benefits, and improved working conditions.

Accordingly, NYSNA strongly supports Intro. 1391 and urges the City Council to pass this legislation.

Submitted by:

Leon Bell, Director of Public Policy
New York State Nurses Association
leon.bell@nysna.org



Testimony of the Partnership for New York City

New York City Council Committee on Consumer and Worker Protection

Introduction 1391 of 2025 – Compensation and training standards for security guards

October 30, 2025

Thank you, Chair Menin and members of the committee, for the opportunity to testify on Int. 1391, which would set compensation and training standards for security guards. The Partnership for New York City mobilizes private sector resources and expertise to advance New York City's standing as a global center of economic opportunity, upward mobility, and innovation. We are a nonprofit organization whose members are preeminent business leaders and companies that support nearly one million jobs in New York City and deliver approximately \$236 billion in economic output.

The Partnership strongly opposes Int. 1391, which would direct the Department of Consumer and Worker Protection to establish and enforce new minimum wage, benefit, and training standards for all security guards in New York City. This legislation would set a troubling and unlawful precedent by allowing the city to create its own wage and benefit requirements separate from and inconsistent with state law.

New York law prohibits municipalities from establishing their own minimum wage rates. This bill would upend that long-established legal framework, inviting costly litigation and creating confusion for employers and workers alike. If upheld, it would open the door for a patchwork of local wage mandates across industries, destabilizing the uniform labor standards that have helped make New York competitive and economically strong.

Consistent statewide labor policy is critical to maintaining a predictable business environment and ensuring that employers can plan, hire, and grow with confidence. A city-by-city or industry-by-industry approach to wage setting would drive up compliance costs, discourage investment, and ultimately threaten jobs, particularly among small and mid-sized businesses that make up the backbone of our local economy.

For these reasons, we urge the Council to reject Int. 1391 and instead work with state leaders to address wage and training standards through coordinated, statewide policy.

Thank you.



8507 Oxon Hill Road, Suite #101, Fort Washington, MD 20744

**Before the New York City Council
Committee on Consumer and Worker Protection
Hearing on Int. No. 1391-2025 - Establishment of Compensation and Training Standards for Security Guards**

Submitted by:

Glory E. Anaba, Esq.
Staff Attorney || Securemedy Incorporated

To:

The Honorable Members of the New York City Council Committee on Consumer and Worker Protection

Attention:

Majorie Velázquez, Chairperson
City Hall, New York, NY 10007

**Re: Written Testimony on Int. No. 1391-2025- Establishment of Compensation
and Training Standards for Security Guards**

Submitted: 29th October 2025

Chair Velázquez, Distinguished Members of the Committee, on behalf of Securemedy Incorporated, we extend our appreciation for the opportunity to submit this testimony regarding Intro 1391-2025, a proposed Local Law to establish compensation and training standards for private security guards in New York City.

Securemedy Incorporated is a licensed security firm with operations spanning multiple U.S. jurisdictions, including New York City. As both a contractor and an employer, we operate within a matrix of federal and state labor frameworks, balancing statutory compliance with workforce welfare. We therefore approach this legislation not merely as a regulated entity but as a stakeholder committed to the integrity of the security profession.

Acknowledgment of Legislative Intent

As a company, Securemedy Incorporated strongly endorses the objectives and underlying purpose of this bill. Historically, the private-security sector has operated without consistent wage standards and comprehensive training benchmarks, despite its vital contribution to the city's public safety framework. Security guards often function as first responders, risk mitigators, and, in many instances, serve as de facto emergency coordinators, underscoring the importance of establishing fair and uniform professional standards.

The proposed legislation aims to bridge existing regulatory gaps by harmonizing the requirements outlined in New York Labor Law, General Business Law Article 7-A, and the federal Service Contract Act (SCA). It explicitly addresses private-sector security contracts that are not subject to federal oversight, thus tailoring protections to local needs. Legally, this approach leverages the City's home-rule authority under the New York City Charter, ensuring that local regulations complement and reinforce federal and state frameworks.

Moreover, this initiative aligns with internationally recognized principles of fair labor practices, as exemplified by ILO Conventions Nos. 131 and 155, reaffirming the city's commitment to uphold fair employment standards in the



8507 Oxon Hill Road, Suite #101, Fort Washington, MD 20744

security sector. Overall, the bill represents a necessary and prudent step toward enhancing professionalism and fairness in this critical industry.

Recommendation for a Clear and Consistent Implementation Approach

We strongly urge the Committee to prioritize implementing this law by establishing clear, transparent, and predictable rule-making processes overseen by the Department of Consumer and Worker Protection (DCWP). In particular, because Service Contract Act (SCA) contracts are explicitly exempted, it is vital that an annually published formula determine the “standard hourly wage” for private contracts. This formula should be based on empirical data, such as prevailing rates observed under union agreements and public-service benchmarks, to ensure fairness and accuracy.

Ensuring wage predictability is essential for maintaining labor market stability. It will help protect both employers and employees from arbitrary or unpredictable changes, thereby encouraging contractual compliance. This approach reduces the risk of mass contract cancellations and legal disputes, promoting a more stable and equitable employment environment.

Standards for Training and Legal Acknowledgment of Equivalence

We commend the bill’s emphasis on comprehensive training, particularly in the critical areas of crisis management, de-escalation, and mental health awareness, as these competencies are essential for effective and responsible practice in the relevant industry. Nonetheless, it is important to note that Article 7-A of the New York General Business Law already mandates licensure and requires annual training through approved programs, thereby establishing a baseline of professional standards.

In light of this existing statutory framework, we recommend that the Department of Consumer and Worker Protection (DCWP) incorporate an explicit equivalency clause into the legislation. Such a clause would permit the pre-approval or official recognition of employer-sponsored training programs that sufficiently meet or exceed the statutory standards outlined in Article 7-A. This approach would foster a flexible, efficient regulatory environment, enabling innovative, employer-specific training initiatives while ensuring that all training programs meet the required competence standards.

Implementing this recommendation aligns with the principles of proportionality in administrative law, ensuring that regulatory requirements serve their intended purpose without imposing unnecessary duplication or administrative burdens. It promotes a balanced regulatory framework that safeguards public interests and supports industry innovation without compromising the quality and consistency of training practices.

Enforcement and Good-Faith Compliance

Securemedy Incorporated advocates for the implementation of enforcement measures that effectively safeguard workers' rights while simultaneously fostering a culture of accountability within organizations. Recognizing the complexities involved in complying with new regulatory obligations, it is essential that these mandates be introduced with an adequate transition period. Specifically, we recommend that a good-faith compliance window of at least twelve months from the date of enactment be established. This extended timeframe would provide employers with sufficient time to adjust their operational procedures, including reconfiguring payroll systems, scheduling employee training programs, and modernizing record-keeping platforms.



8507 Oxon Hill Road, Suite #101, Fort Washington, MD 20744

Incorporating such a grace period aligns with fundamental due-process principles that underpin both federal administrative practices and the enforcement precedents set forth under the City's Earned Safe and Sick Time Act. It ensures that organizations are afforded a fair opportunity to achieve compliance without facing undue penalties or operational disruptions during the initial phases of the policy's implementation. This measured approach not only enhances fairness and transparency but also encourages cooperative engagement between regulatory authorities and the business community, ultimately contributing to a more effective and equitable enforcement process.

Employer Participation in Advisory and Rule-Making Processes

The bill proposes the creation of a Division of Security Guards within Title 32, tasked with overseeing the implementation of related policies and regulations. We respectfully recommend the inclusion of employer representatives on any advisory boards or consultative committees established under this Division. Such joint participation by unions, employers, and the City reflects the tripartite consultation model endorsed by ILO Convention 144. This approach ensures that regulatory decisions are informed by practical, on-the-ground insights while promoting legitimacy, transparency, and balanced accountability in the regulatory process.

Broader Economic and Regulatory Consequences

When harmonized with existing state and federal frameworks, this proposed bill could significantly enhance labor market stability and improve occupational safety and health standards. Specifically, it can help reduce employee turnover and create a more stable workforce; strengthen compliance with Occupational Safety and Health Administration (OSHA) regulations and their state counterparts; and bolster New York City's Environmental, Social, and Governance (ESG) credentials in areas such as public procurement and workforce equity.

However, it is essential to recognize that a rapid or poorly coordinated implementation process, especially one involving overlapping enforcement mechanisms, could lead to jurisdictional disputes and compliance challenges. Such issues may be particularly acute for contractors engaged in both Security Contracting Authority (SCA) and non-SCA engagements. Securemedy recommends that the New York City Council direct the Department of Consumer and Worker Protection (DCWP) to issue comprehensive implementation guidance. This guidance should clearly delineate jurisdictional boundaries to mitigate potential conflicts and facilitate a smooth rollout.

Securemedy fully endorses the Council's objective to professionalize and dignify the security industry through the establishment of statutory wages, training standards, and related measures. Our primary concern is that the final legislation embodies core principles of transparency, fairness, and cooperative regulation. Such principles are essential to ensuring sustainable compliance, safeguarding the integrity of critical security services, and avoiding destabilization of the workforce.

Finally, we are prepared to forge a strategic alliance with the City Council, SEIU 32BJ, and the Department of Consumer and Worker Protection. Our commitment is to drive transformative policies, robust compliance systems, and comprehensive training programs that uphold workers' dignity and streamline industry operations. Together, we believe we can establish a new benchmark for fairness and excellence.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Glory E. Anaba', is written over a blue circular stamp.

Glory E. Anaba, Esq.,
Staff Attorney || Securemedy Inc.



Testimony to the New York City Council City Council

Committee on Consumer and Worker Protection

October 30th, 2025

Good afternoon. My name is Mohamed Attia, and I am the Managing Director of the Street Vendor Project. I would like to thank Chair Menin and the Committee for the opportunity to testify today. The Street Vendor Project (SVP) is a membership-based organization with more than 3,000 vendor members. We strive to support street vendors across the 5 boroughs by providing direct services such as small business consultations, legal representation, and access to a wide variety of resources. We also organize to build power to the vendors community across the city and ensure that their voices are heard, and they have a seat at the table when policies and rules are being developed that will impact their livelihoods. Vast majority of our members are immigrants who hail from across the globe. Given the diversity of our membership, our services are offered in 7 different languages, Arabic, Bangla, English, French, Mandarin, Spanish and Wolof, thanks to the diversity of our small team.

We're here to express the urgency of passing the Street Vendor Reform Package, intros 431, 1251, 24 & 408. This package of bills will ensure that we have a functioning system in NYC for street vending, instead of what we have right now, which isn't serving anyone in our city. For decades, street vendors have been dealing with an outdated system, a system that criminalizes their work, penalizes them, and prevents them from accessing opportunities to formalize their businesses.

As a consequence of having this system, street vendors have become more vulnerable to attacks by the federal government. **We saw last week's ICE raid on Canal Street**, and what that did to the vendors community, not only in Canal Street and the surrounding neighborhoods, but across the city.

Again, **yesterday, ICE stopped street vendors in Downtown Brooklyn** and checked their IDs and their immigration status.

You probably should know why ICE is going after our vendors. You shouldn't be surprised, since vendors have been treated as criminals by their own local government for decades.

And as Speaker Adams said recently, the bill that passed in September only decriminalized vending, but hasn't legalized it yet.

So, what are we waiting for?

How many vendors should get detained by ICE and deported for the council to realize the need and urgency to take action.

Please don't come to our rallies, and don't make statements in support of the vendors, if you're not a co-sponsor of the bills that will provide safety for vendors. If you're not advocating for the reforms to pass immediately!

Your kind words are not helpful right now. We need actions and solutions more than your sympathy. We need the reform package to pass, and we need it now.

For the Councilmember who receive complaints about vendors, and are too afraid to do the right thing, we have a message for them;

What have you done to address the issue?

Calling the cops on the vendors hasn't fixed anything.

We've seen it over and over again, it's nothing but waste of time and resources, and the vendors don't go anywhere

Have you considered a different approach? Have you considered providing the proper license to the vendors, offering them training, then enforcing the law?

You should consider that, as it's the only approach that we know will work, and we have seen it in practice.

The DOHMH data states that 97% of permitted food carts and trucks have an **A grade** on them. That's how compliance with the health code has been going for licensed vendors.

For unlicensed vendors, you can't enforce most of the laws around health code or public safety. You can only ask them to shut down their business and leave, after slamming them with high fines.

The time is now to fix the system, once and for all!



National Association of Security Companies

444 North Capitol Street, NW
Suite 203
Washington, DC 20001
www.nasco.org



Written Testimony
Stephen Amitay
on behalf of the
National Association of Security Companies
on Int. 1391
Committee on Consumer and Worker Protection
October 30, 2025

The National Association of Security Companies (NASCO) is the trade association for the U.S. contract security industry. NASCO members employ over 400,000 security officers across the United States. In New York City, NASCO member companies employ almost thirty thousand trained security officers who are providing security services at a vast array of client sites. These officers receive comprehensive training required by State law, client contracts, CBA's, NYFD regulations, and training is also tailored to their specific job sites.

Introduced in response to the active shooter incident at 345 Park Ave in July that tragically claimed the lives of on duty Security Officer Aland Etienne and NYPD Officer Didarul Islam, Introduction 1391 has been described as a measure to address the issue that security officers are "too often denied the training that could save their lives and ours." Suggesting that Officer Etienne would have survived if given more training, especially when a highly trained armed NYPD officer also died in the incident, is misleading and callous. Security Officer Etienne's death was tragedy, and no amount of additional training could have saved his life in such a situation.

And when looking at the additional training required by Int 1391, a good amount of it is not even geared toward officer safety with required subjects including "Community health and wellness including drug and alcohol addiction, homelessness, and mental illness" and "Security officers' workplace rights, including health and safety, anti-discrimination, and wage and hour laws."



Currently, under New York State law, to work as an unarmed security officer in the State, a person must satisfactorily complete an eight hour pre-assignment training course; an on-the-job training course to be completed within ninety working days following employment, consisting of a minimum of sixteen hours and maximum of forty hours; and an eight hour annual in-service training course. All such training and trainers must be certified and approved by the State. The combined amount of initial and annual training that New York requires a security officer to receive – at a minimum – puts New York near the top of required training hours for security officers among States. Also, as mentioned, security officers in New York City receive additional training on top of the State required training as required by CBA's, client contracts, pursuant to FDNY Fire and Life Safety Rules, and it also important that training and guidance for security officers be site/post specific.

As for the additional training in Int. 1391 that state licensed security officers in NYC will have to take in order to lawfully continue to work, much of it is duplicative of existing required state and other training currently being provided to security officers in the City. More concerning, some of the additional training seems intended for involving security officers in activities and situations that are outside their duty scope, violate post orders, could lead to unnecessary danger and harm for security officers, and subject security officers to potential criminal and civil liability.

In many private security contracts and post orders, which define the duties and govern the actions of a security officer, there are clear prohibitions on a security officer getting involved in a disturbance or situation that is not endangering a client employee, visitor, customer, or the security officer. This not only can prevent an unnecessary dangerous/harmful interaction for the security officer and a worsening of the situation, but it is also a recognition that when a private security officer does interact with a person and something goes bad, unlike police officers, firefighters, EMT's, public safety and health officials, and emergency response providers, a private security officer has no "good faith" legal immunity for an unintended result



of their action. Getting involved in a dangerous situation can subject the officer to criminal as well as civil prosecution, as well as the security officer's employer.

However, while one can debate whether additional government mandated training - -- for any profession or occupation --- could be beneficial, and also in this instance, be implemented effectively into a private market, what is clear is that Int 1391 effectively impose an additional licensure requirement for security officers to be able to work in New York City. Under Int 1391 a security officer holding a valid state registration cannot lawfully work in NYC unless that officer's employer provides the extra training in Int 1391 and no amount of "workplace-safety" labeling changes the operative conflict. This conflicts with the New York State Security Guard Act (General Business Law art. 7-A) which established a comprehensive and exclusive statewide framework for the registration, training, and supervision of security officers. Moreover, the Security Guard Act's text, structure, and legislative record collectively demonstrate that the Legislature intended to preclude municipalities from imposing any additional or different training or licensing requirements.

More generally, the Bill will pose significant challenges for security businesses (especially smaller companies) in increased operational costs, extensive recordkeeping and compliance procedures, and associated financial and administrative burdens. It could also impact and delay the hiring timeline for security officers in New York City and discourage workforce entry.

The significant increase in security officer expenses will be passed on to New York City clients who are already challenged with constrained security budgets. These additional financial burdens will prompt clients to use less expensive technological security measures and reduce the number of security personnel assigned per contract. Or security positions will be reclassified to that of concierges, lobby ambassadors, or front desk personnel to avoid the burdens of the Bill. Consequently, such measures will result in job losses within the security workforce and weaken the overall safety levels in the city due to reduced staffing.

NASCO

National Association of Security Companies

444 North Capitol Street, NW
Suite 607
Washington, DC 20001
www.nasco.org



Finally, as with the training provisions, the bill's provisions setting wages for security officers too seem to clearly intrude into an area that is already occupied by comprehensive state statutes, specifically the State Minimum Wage Act (Labor Law art. 19).



Center for
New York City
Affairs

Center for New York City Affairs
The New School
New York, NY 10011
www.centernyc.org

New York City Council
Committee on Consumer and Worker Protection
On Establishment of compensation and training standards for security guards
Honorable Julie Menin, Chair

October 30, 2025

Good afternoon and thank you Chair Menin and the Committee on Consumer and Worker Protection for the opportunity to speak today on the Aland Etienne Safety and Security Bill. My name is Lauren Melodia, and I am an economist at The New School's Center for New York City Affairs. We conduct independent economic and labor market analysis to build better livelihoods for workers, families and communities in New York City.

There are approximately 81,900 private security officers in New York City. The vast majority of them (85 percent or more) work full-time, year round.¹ And yet, despite the hard work they do every day to protect New Yorkers, one-third of private security officers that earn less than \$20.75 per hour can be defined as “working poor.” “Working poor” is a term our Center uses to describe New Yorkers who, despite having a job, live in a family earning less than 200 percent of the federal poverty line. Keep in mind: the federal poverty line is a national threshold; it doesn't take into account the cost of living in New York City, so “working poor” in many ways under-measures the extent of the affordability crisis in New York. But it is an important term when thinking about minimum wage expectations and standards, because it is a group of workers whose employers are shirking the responsibility to cover their employees' basic cost of living and, instead, putting this responsibility on the government and taxpayers.

The federal poverty line is used as a threshold for most public assistance programs – from the federal SNAP (the Supplemental Nutrition Assistance Program) and Medicaid programs, to the State's health care Essential Plan and child care vouchers, to the City's housing voucher and fair fares program (see Table 1). These programs are intended to provide a social safety net for families that face temporary or long-term unemployment or other hardships. When they are relied on by workers, they are subsidizing businesses that should be paying full-time, year-round workers enough to cover basic living expenses like food, housing, and transportation. Of security officers who live in New York City, nearly half received public health insurance coverage in 2023 and nearly a third relied on SNAP.² This is far greater than public assistance rates amongst New York City workers in general (only 18 percent of working New Yorkers are on Medicaid, for example), which is a sign that the City Council needs to set some guardrails for the private security industry.

¹ Carmen Brick, Enrique Lopezlira, and Nari Rhee, “Factsheet: Demographic and Job Characteristics of NYC's Security Guard Workforce,” UC Berkeley Labor Center, 2025.

² ACS 1-Year Estimates Public Use Microdata Sample (2023) for PRT-Security Guards And Gambling Surveillance Officers in New York City PUMAs. Available at data.census.gov/mdat

Table 1: Income thresholds for benefits in New York City

Public Assistance Program	Income Eligibility Threshold (% of Federal Poverty Line)
Medicaid	138%
Fair Fares	145%
SNAP Food Stamps	150% if no dependents, 200% if dependents
NYS Essential Plan	250%
Child Care Vouchers	300%
Housing Vouchers	varies

In recent years, New York City has experienced a steady rise in public assistance utilization. Medicaid and SNAP cases have risen by 20% five years after the pandemic. Cash assistance enrollment has skyrocketed – nearly doubled since the pandemic. There is significant need in New York City, which had an uneven recovery from the pandemic and disproportionately led to long-term unemployment for many low-income New Yorkers. But this need also puts a strain on the State and City budget, making it challenging to start new initiatives or expand other services that have City or State budget implications. Now the State and City are facing slower economic growth (and potentially a recession) as well as new federal funding cuts and public assistance eligibility requirements from the passage of Congress’s One Big Beautiful Bill Act in July 2024. The passage of this bill is expected to result in 860,000 New York City residents losing Medicaid.³ New York will have to make some tough choices in the next few years so that it can maintain services to families in need. But one of those choices should also include requiring industries with a record of low wages to increase workers’ compensation and benefits so that taxpayer dollars can be used to support the most vulnerable New Yorkers, not to subsidize companies that are paying poverty wages.

This is not just an economic problem; this is also a racial equity problem that the City Council must prioritize. In New York City, the “working poor” is disproportionately composed of workers of color. And the security officer field is as well. Ninety percent of security officers are non-white; 51 percent identify as Black and 28 percent identify as Hispanic.⁴ The Aland Etienne Safety and Security Bill will benefit these workers directly, by increasing their income to be on par with prevailing wage standards already established in the public sector, requiring a benefits supplement, and creating pathways for security officers to receive meaningful benefits and paid leave. The bill will also stabilize the security workforce, which has incredibly high turnover (77 percent annual turnover rate), and increase training and support to this sector, which will increase public safety for all New Yorkers.

³ Governor Kathy Hochul, “Governor Hochul and House Democratic Leader Hakeem Jeffries Warn of Detrimental Impacts of President Trump’s One Big Ugly Bill,” June 1, 2025, accessed at: <https://www.governor.ny.gov/news/governor-hochul-and-house-democratic-leader-hakeem-jeffries-warn-detrimental-impacts-president>.

⁴ Carmen Brick, Enrique Lopezlira, and Nari Rhee. “Demographic and Job Characteristics of NYC’s Security Guard Workforce.”

**Presentation to the New York City
Committee on Consumer and Worker Protection
Enrique Lopezlira, PhD
UC Berkeley Center for Labor Research and Education
October 29, 2025**

Good morning, Madam Chair Menin, and members of the Committee. My name is Enrique Lopezlira. I am the director of the low wage work program at the UC Berkeley Center for Labor Research and Education (Labor Center). The Labor Center conducts research and education on issues related to labor and employment both in our home state of California and throughout the United States. Thank you for the opportunity to present key findings from our recent research on the private security guard workforce in New York City.

Security guards in NYC are essential workers—protecting our buildings, hospitals, and transit hubs. Yet, their compensation and working conditions do not reflect their significant role. Their responsibilities have evolved to include de-escalating conflicts and managing crises, all while facing higher rates of assaults and fatal injuries on the job. They take on these risks without the benefits and training offered to workers in similar protective service occupations.

According to our analysis of Census data, the median hourly wage for security guards is only \$20.29. This is not a living wage. A staggering 8 out of 10 (80.1%) private security guards earn less than the \$32.85 an hour a single adult in New York County would need to make to be self-sufficient, according to the MIT Living Wage. Their median annual income of \$40,311 is less than 40% of the NYC Area Median Income.

This is a workforce primarily composed of workers of color (90.6%) with Black workers accounting for over half (50.8%) of the workforce. We see significant racial and gender wage gaps in the data. Black security guards earn a median hourly wage of \$19.06, and female security guards earn even less at \$17.59.

These poor conditions drive high turnover. The security services sector in NYC has an annual employee turnover rate of 77.0% in 2024, which is dramatically higher than the overall private sector rate of 58.1%. This high turnover directly impacts security effectiveness. Job quality is thus a critical issue of both economic justice and public safety.

New York City has a unique opportunity to lead the nation in setting higher labor standards for this growing and overlooked industry. Setting robust labor standards for this workforce is necessary to ensure a safe and equitable New York City. Thank you for your time and attention, and I welcome any questions you have.

FACTSHEET:**Demographic and Job Characteristics of NYC's Security Guard Workforce****By Carmen Brick, Enrique Lopezlira, and Nari Rhee**

Security guards in New York City ("NYC") were essential workers during the pandemic¹—ensuring public safety in buildings, hospitals, and transportation hubs—but their compensation and working conditions do not reflect their significant role. Security guards' responsibilities have evolved to include de-escalating conflicts, managing crises, and enforcing health and safety protocols—and they do this all without the hazard pay, benefits, and training offered to workers in similar occupations.² They also experience higher rates of assaults and fatal injuries while on the job compared to many other workers.³ Although the use of private security services has grown in recent decades, security guards lack appropriate labor standards and a sufficient focus from policymakers.

This factsheet highlights the characteristics of the private sector security guard workforce in NYC,⁴ home to a large part of the nation's security guard workforce.⁵ With its scale and visibility, NYC has the potential to set a national standard for improving labor conditions in the security services industry, which has national revenues of \$22.7 billion for unarmed guard services alone.⁶ The labor conditions of security guards are also foundational to broader questions of how cities achieve public safety.

According to data from the U.S. Census American Community Survey, approximately 81,900 security guards work in NYC. These workers are primarily men (77.3%) and workers of color (90.6%). In NYC, Black workers⁷ account for one out of every two security guards (50.8%).⁸ Almost half of the security guards in NYC are foreign born (44.7%), and about two in four have educational attainment beyond high school (47.1%), including post-secondary degrees and some college. Overall, security guards have a median income of \$40,311, which is less than 40% of the NYC Area Median Income (AMI).⁹ About one in five NYC security guards has a family income below 200% of the poverty level (21.7%), and more than one in three (37.8%) are without health insurance through their employer or the employer of a household member (see Table 1).¹⁰

Most security guards in NYC work full time (84.7%) and full year (88.7%), and have a median hourly wage of \$20.29. Relatedly, about one out of two security guards earns less than this median wage. Although nearly all the security guards working in NYC live in the city (89.5%), and thus bear the city's higher cost of living, more than four out of five security guards (80.1%) earn less than the living wage for a single adult according to the MIT Living Wage Calculator (\$32.85).¹¹

Table 1: Demographics and Job Characteristics of NYC Security Guards (all figures are percentages unless otherwise noted)

This table provides useful data about who works as security guards in NYC and the quality of their jobs. The first column estimates these statistics for all private security guards in NYC. The second column only examines these statistics for private security guards earning less than 2/3 the area median wage, equal to about \$20.75.

	Percent of Workforce	Percent of Low-wage Workers (those paid < \$20.75/hr)
Gender		
Male	77.3	73.0
Female	22.7	27.0
Median Age	42	38
Age		
18-19	0.7	1.1
20-29	22.9	29.6
30-39	20.8	21.6
40-54	35.6	32.3
55-64	20.0	15.5
Race/Ethnicity		
White	9.4	5.7
Black	50.8	56.7
Latino	27.8	24.2
Asian	5.4	5.3
Other	6.6	8.0
Education		
Less than High School	12.0	14.9
High School or GED	40.9	42.0
Some College	22.3	23.1
Associate's Degree	12.2	11.2
Bachelor's Degree or Higher	12.6	8.8
Country of Birth		
US Born	55.3	53.6
Foreign Born	44.7	46.4

Table 1 continued

Table 1 continued

	Percent of Workforce	Percent of Low-wage Workers (those paid < \$20.75/hr)
Family Structure		
Married	36.4	26.4
Have Children	33.9	27.3
Family Income Relative to Poverty Level		
Less than 100% of Poverty Level	4.7	6.9
100% to 200% of Poverty Level	17.0	26.7
More than 200% of Poverty Level	78.3	66.4
Median Individual Annual Earnings (2025 Dollars)	\$40,311	\$30,233
Full-Time / Part-Time Worker		
Full-Time (35 or More Hours per Week)	84.7	80.5
Part-Time (Fewer than 35 Hours per Week)	15.3	19.5
Full-Year / Part-Year Worker		
Full-Year (50-52 Weeks per Year)	88.7	90.9
Part-Year (Fewer than 50 Weeks per Year)	11.3	9.1
Health Insurance Provided by Employer/Union		
Yes	62.2	58.9
No	37.8	41.1
Median Hourly Wage	\$20.29	N/A
% Workers Earning Less than Living Wage (\$32.85)	80.1	100.0
NYC Resident	89.5	92.8

Data Source: UC Berkeley Labor Center analysis of American Community Survey pooled 2021-2023 data.

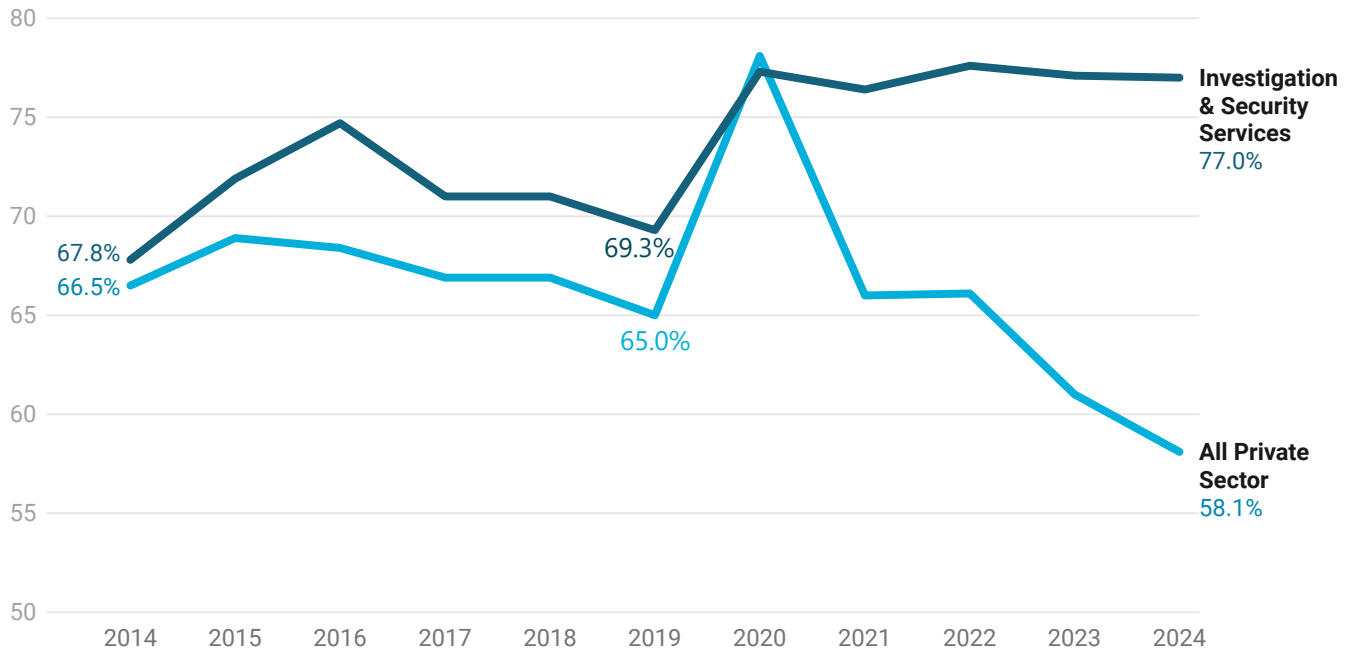
Wages for security guards vary notably by race and gender. Black security guards earn a median hourly wage of \$19.06, while female security guards earn even less, at \$17.59. In contrast, white security guards have the highest median wage at \$30.22—more than \$10 higher than most other groups.¹² Latino and Asian American security guards earn median hourly wages of \$21.47 and \$21.04, respectively, highlighting racial and gender wage gaps in the security guard industry.¹³ Establishing more robust labor standards for the security guard industry has the potential to reduce these gaps.

We also examined the demographic and job characteristics of security guards earning less than 2/3 of the area median wage—a common metric for low-wage work—which in NYC is equivalent to \$20.75 per hour (as shown in the second column of Table 1).¹⁴ Among the security guards earning these lower wages, almost six in ten (56.7%) are Black, and more than one in four are women (27.0%). Black and female workers are thus more heavily represented in this

especially low-paid portion of the security guard workforce. A third have family incomes below 200% of the poverty level (33.6%), and median annual individual earnings for this subset of workers equal \$30,233. Most work full-time (80.5%) and full year (90.9%), and four in 10 (41.1%) are without healthcare from their employer or the employer of a household member.

Finally, we analyzed employee turnover in the Investigation and Security Services sector (in which security guards make up about three-quarters of employment) from 2014 to 2024. We find that turnover in the NYC security industry has risen over time and is much higher than in the private sector as a whole. In 2024, the security services sector had a turnover rate of 77%, compared to the pre-pandemic rate of 69.3% in 2019. In contrast, overall private sector turnover in NYC decreased from 65.0% in 2019 to 58.1% in 2024, after a temporary spike during the pandemic.

Figure 1: Annual Employee Turnover in NYC Security Industry vs. All Private Sector, 2014–2024



Note: Authors' calculations based on BLS Current Employment Survey data. Turnover is calculated as the total number of separations divided by average employee count each year. Data are for calendar years, except 2024 which reflects July 2023-June 2024.

There is a wide body of research on the correlation between employee compensation and turnover across economic sectors, from fast food to healthcare to human services.¹⁵ In turn, worker turnover and retention have direct impacts on worker productivity and service quality. In a study focused on airport security screeners at SFO, Reich, Hall and Jacobs found that the rate of security breach detection fell by 0.62% for every percentage point increase in turnover.¹⁶

When SFO's living wage policy increased wages from \$6.45 to \$10 an hour, this led to a dramatic decrease in security screener turnover, from 94.7% to 18.7%. Wage increases also reduced absenteeism and resulted in more effective security screening. Another study of police officers found that those who received raises after a union negotiation process performed better on the job than those who did not.¹⁷

Despite their evolving responsibilities, security guards in NYC experience low wages, high turnover, and limited access to benefits and training—conditions that undermine both worker well-being and public safety. Improving job quality in this sector is a matter both of economic justice and of public safety, and thus requires policymakers' attention. With its large and visible security guard workforce, NYC has a unique opportunity to lead the nation in setting higher labor standards for this growing and often overlooked industry.

Methodology

We used data from the U.S. American Community Survey (ACS) pooling one-year samples from 2021–2023 to estimate demographic characteristics of workers and to estimate wages for the security guard workforce, adjusting for inflation through December 2024 in order to present annual and hourly earnings for calendar year 2025. We used the census occupational code 3930 to identify security guards within the ACS data. The ACS does not include a wage variable, and instead we estimated hourly wages from self-reported income and hours worked using the [Labor Center's established methodology](#).

Since the ACS data are self-reported, we triangulated our estimates of hourly wages with data sets collecting information from employers. For instance, the wages we estimated for security guards working in NYC using the ACS align with available BLS Occupational Employment and Wage Statistics (OEWS) data, which as of May 2024 showed security guards (SOC 33-9032) in the NYC metropolitan statistical area having a median wage of \$20.21. Our estimate of security guards' hourly wage through December 2024 was \$20.29.

We estimated the wages of subgroups of security guards (e.g., by racial group or gender) only when the sample size for each subgroup was 50 or more.

We calculated employee turnover using data on quarterly employee counts and separations for NAICS code 5616 (Investigation and Security Services) from the U.S. Census Bureau's Quarterly Workforce Indicators (QWI) data explorer, aggregating data for the five boroughs of NYC. BLS reports that security guards (SOC 33-9032) made up 73% of employment in this industry in 2023 nationally.¹⁸ The annual turnover rate was calculated as the total number of separations in each calendar year, divided by the average employee headcount for that year based on end-of-quarter and beginning-of-quarter counts.

Endnotes

- 1 See guidance issued by the New York State Department of Economic Development (d/b/a Empire State Development) to supplement New York State Executive Order 202, which restricted non-essential services and operations in response to the Covid-19 pandemic. This guidance establishes security services as essential services. <https://esd.ny.gov/guidance-executive-order-2026>.
- 2 The Bureau of Labor Statistics categorizes security guards as similar to police officers and private detectives and investigators in terms of job duties, among other occupations. <https://www.bls.gov/ooh/protective-service/security-guards.htm#tab-8>.
- 3 Wiatrowski, William. 2012 (February). "On Guard Against Workplace Hazards," *Monthly Labor Review* 0(0):3-11. Also see: (a) Bureau of Labor Statistics (BLS). 2012 (March) "Workplace Safety for Security Guards." TED: The Economics Daily series. https://www.bls.gov/opub/ted/2012/ted_20120309.htm. (b) BLS. "Fatal occupational injuries, total hours worked, and rates of fatal occupation injuries by selected worker characteristics, occupation, and industries, civilian workers, 2023. Fatal injury rates are per 100,000 full-time (FTE) workers." <https://www.bls.gov/iif/fatal-injuries-tables.htm>. (c) BLS. "Incidence rates of nonfatal occupational injuries and illnesses involving days away from work by selected worker and case characteristics and occupation, All U.S., private industry, 2020." Retrieval at: <https://data.bls.gov/gqt/InitialPage>.
- 4 The sample for this factsheet includes only security guards receiving wages from private sector or non-profit employers, and does not include security guards receiving wages directly from government employers. However, given the extent of outsourcing of security services (Dube and Kaplan 2010), private sector security guards included in the sample may work in governmental settings. See Dube, Arindrajit and Ethan Kaplan. 2010. "Does Outsourcing Reduce Wages in the Low-Wage Service Occupations? Evidence from Janitors and Guards," *ILR Review* 63(2):287-306.
- 5 The Bureau of Labor Statistics (BLS) estimated approximately 1.2 million workers were employed as Security Guards and Gambling Surveillance Officers in 2023, and our analysis estimates a current security guard workforce of nearly 82,000 in NYC alone. <https://www.bls.gov/ooh/protective-service/security-guards.htm>.
- 6 2024 Estimates. McErlaine, Brendan. 2025 (March). Security Services in the U.S., On lockdown: New Security Trends Will Enable Security Companies to Effectively Compete, Administration, Business Support and Waste Management Services (56161). IBIS World. Available at: <https://www.ibisworld.com/>.
- 7 The category of Black workers refers to non-Hispanic Black workers in the sample.
- 8 Black workers also have greater representation in the security guard workforce at the national level, making up more than 30% of the security guard workforce according to a 2024 analysis. See Hendrix, Christopher, Brandon Novick, and John Schmitt. 2024. "Employment Challenges Facing Security Guards." *Data Bytes* series. Center for Economic and Policy Research. <https://cepr.net/publications/employment-challenges-facing-security-guards/>.
- 9 The U.S. Department of Housing and Urban Development establishes the Area Median Income for all cities across the country, which then helps to determine eligibility and rents for affordable housing. The New York City Area AMI is \$102,060 in 2025 for a one-person household, making the median annual income of security guards less than 40% of the AMI, which qualifies these workers as very low-income for affordable housing programs. <https://www.nyc.gov/site/hpd/services-and-information/area-median-income.page>.
- 10 The ACS data reports employer- and union-provided health care for the household; therefore, a security guard with employer- or union-provided health insurance might receive this benefit through their own employer or union, OR through that of a household member. The questionnaire text for the

variable reads, “Insurance through a current or former employer or union (of this person or another family member),” and thus should not be understood as a count of security guards receiving health insurance through their own employer.

11 MIT’s Living Wage Calculator estimates that a single person living in New York County (i.e., Manhattan) requires an hourly wage of \$32.85 to meet their basic needs. Living wages for the NYC counties ranged between \$25.48 and \$32.85; we used the New York County wage in order to estimate the upward bound of a basic cost of living in one of the nation’s most expensive places to live. <https://livingwage.mit.edu/counties/36061>

12 Racial wage gaps for security guards in New York appear to be larger than recent estimates at the national level. However, such disparities can vary significantly by region, industry, occupation, union density, and other labor market characteristics. At this time, we have not conducted a detailed analysis of the factors contributing to the wider racial wage gap for security guards in New York compared to other parts of the country. A deeper investigation into these differences is outside the scope of this report but represents an important area for future research.

13 The wages reported for the respective groups show unadjusted wage gaps. Factors such as setting, years of experience, and whether a security guard is armed or unarmed affect wages, and potentially could explain these gaps. Other factors such as outsourcing (Dube and Kaplan 2010) and unionization (Hendrix, Novick, and Schmitt 2024) also affect wages and could explain some part of these gaps. Future research on the contemporary wage gap in the security guard industry should focus upon explaining the processes producing the observable gaps.

14 The New York State Department of Labor estimates a median hourly wage for NYC using OEWS data, which was slightly more than \$31 at the beginning of 2025. Their estimates are based upon May 2024 OEWS reports, which NYSDOL inflated to first quarter 2025 dollars. These estimates are not official BLS statistics, and the NYSDOL adjusts these estimates based upon changing economic conditions. The median hourly wage should thus not be understood as reported wages for 2025, but rather as a reasonable threshold figure for defining low-wage work. See: <https://dol.ny.gov/occupational-wages-0> and <https://dol.ny.gov/occupational-employment-and-wage-statistics-technical-notes>.

15 For a review of the literature on the relationship between wages and turnover, see Gallear, Amanda, 2017, *The Impact of Wages and Turnover on Security and Safety in Airports: A Review of the Literature*, UC Berkeley Labor Center. <https://laborcenter.berkeley.edu/the-impact-of-wages-and-turn-over-on-security-and-safety-in-airports/>.

16 Reich, Michael, Peter Hall, and Ken Jacobs. 2005. Living wage policies at the San Francisco airport: impacts on workers and businesses. *Industrial Relations*. Vol. 44, No. 1, pp. 106-38; Reich, Michael, Peter Hall, and Ken Jacobs. 2003. *Living Wages and Economic Performance: The San Francisco Airport Model*. Institute of Industrial Relations, University of California, Berkeley. <https://laborcenter.berkeley.edu/living-wages-and-economic-performance-the-san-francisco-airport-model/>.

17 Mas, Alexandre. 2006. “Pay, Reference Points, and Police Performance.” *Quarterly Journal of Economics* 121 (3): 783–821. <https://www.nber.org/papers/w12202>.

18 U.S. Bureau of Labor Statistics, “May 2023 National Industry-Specific Occupational Employment and Wage Estimates; NAICS 561600 - Investigation and Security Services.” https://www.bls.gov/oes/2023/may/naics4_561600.htm.

Acknowledgments

We would like to thank Savannah Hunter for a thorough review of the underlying data analysis and for her advice on the use of Bureau of Labor Statistics data. We also appreciate the editorial support from Jenifer MacGillvary.

About the Authors

Carmen Brick is a senior researcher in the Low-Wage Work Program at the UC Berkeley Labor Center. Enrique Lopezlira is the director of the Low-Wage Work Program at the UC Berkeley Labor Center. Nari Rhee is the director of the Retirement Security Program at the UC Berkeley Labor Center.

Suggested Citation

Brick, Carmen, Enrique Lopezlira, and Nari Rhee. "Demographic and Job Characteristics of NYC's Security Guard Workforce." UC Berkeley Labor Center. August 2025. <https://laborcenter.berkeley.edu/demographic-and-job-characteristics-of-nycs-security-guard-workforce/>.



This work is licensed under a [Creative Commons Attribution 4.0 License](https://creativecommons.org/licenses/by/4.0/).



UC Berkeley Labor Center

The Center for Labor Research and Education (Labor Center) is a public service project of the UC Berkeley Institute for Research on Labor and Employment that links academic resources with working people. Since 1964, the Labor Center has produced research, trainings, and curricula that deepen understanding of employment conditions and develop diverse new generations of leaders.

The analyses, interpretations, conclusions, and views expressed in this factsheet are those of the authors and do not necessarily represent the UC Berkeley Labor Center, the Regents of the University of California, or collaborating organizations or funders.

**Testimony to the New York City Council
Committee on Consumer and Worker Protection**

October 30, 2025

**Testimony of Trevena Garel, Retired Sergeant Supervisor, Detective Squad
New York Police Department**

Thank you for the opportunity to testify today on Int. No. 1391, the Aland Etienne Safety and Security Act.

My Name is Trevena Garel. I am an adjunct Professor of Criminal & Social Justice at Monroe University, and a training instructor at the 32BJ Thomas Shortman Training Center. I have also taught at Saint John's University and John Jay College of Criminal Justice. Prior to teaching, I served over two decades with the NYPD retiring as a Sergeant Supervisor Detective Squad.

As a former law enforcement officer, I can testify firsthand to the essential role that security officers play in New York City's public safety. Throughout my career with the NYPD, I consistently observed security officers support the work of police officers, perhaps most notably during the 9/11 terrorist attacks and its aftermath.

Despite their key role in New York City's public safety infrastructure, security officers lack the training, pay and benefits commensurate with their importance. Building owners expect employees to not only secure their properties but also mediate disputes and deescalate dangerous situations. However, the skills required to do so do not come naturally to most people – they must be learned. This is why it is so important for the city to supplement the existing state training standards with training designed to meet the unique challenges that New York City officers face.

Additionally, many security officers I have trained are living very precariously. I have literally taught officers who work all day patrolling a homeless shelter and then go to sleep at night at a homeless shelter. Low pay contributes to high turnover, and when turnover is high, you lose the benefits conferred by training in the first place. In order to ensure that well-trained security officers can support New York's public safety it is crucial that they receive wages and benefits that allow them to live in our increasingly expensive city. Thank you again for your work on this issue.

10.30.25 Testimony | Bodrun Nahar

- Hello. Thank you for having me here today.
- My name is Bodrun Nahar.
- 11 years ago, I came here from my home country of Bangladesh in hopes of building a better future for myself and my family.
- I have two very intelligent daughters who have bright futures, but because of our financial situation, I don't know if I will be able to support their higher education.
- I have been working as a security officer for more than a year.
- I work at a building where there are offices and a school.
- I bring a lot of care to the job. I want New Yorkers to feel safe and be protected when they are coming and going from work or school.
- I work hard to protect this city and its people.
- Every day, I work hard to protect this city and its people.
- I bring a lot of care to the job.
- But I am earning poverty wages.
- And with the company provided health insurance, I have to pay \$200 a week out of my own pocket – and that's only to cover myself.
- I have rent and phone bills to pay. We've had a few family emergencies lately.
- And with the company provided health insurance, I have to pay \$200 a week out of my own pocket – and that's only to cover myself.
- I have rent and phone bills to pay. We've had a few family emergencies lately.

- The Aland Etienne Safety and Security Act will help me achieve the American Dream.
- So with my hard work, I can build a better life for my daughters.
- Together, we can help thousands of other workers do the same.
- Let's pass Aland's Act.
- Thank you.

10.30.25 Testimony - Clarissa Baynes

- My name is Clarissa Baynes. I have been working as a security officer for 18 years.
- Thank you for having me here today to speak out on behalf of security officers.
- I have been working at 1776 Broadway – a major commercial building – for the past seven years.
- I care a lot about my job – and I think I’m pretty good at it.
 - I know all the people and all the businesses.
 - I work the overnight shift, so I say goodbye to people on their way out for the day. Then, I keep their offices and stores safe overnight.
- With my hard work, I protect their hard work – and their livelihoods.
 - And if things do happen, I am the first line of defense. I am there to respond and to protect.
- But even though I work an important, full-time job, I’m struggling to keep up with bills.
 - I’m a lifelong New Yorker – Brooklyn born and raised. And every year, it gets harder to keep up with the cost of living. Rent, electricity, groceries. The cost of everything is going up.
- I also don’t have good health coverage.
 - I’ve had a few health problems pop up over the years. Each time, I’ve had to pay out of pocket for medical care.
 - As I get older, that’s terrifying. What if I get really sick? I could wind up with thousands of dollars in debt.

- And I know I'm not alone. I know there are many of my fellow security officers who are struggling.
 - We're risking our lives, but living paycheck to paycheck.
 - For too many of us, our lives feel unstable.
 - That is also contributing to high turnover. I've seen a lot of great security officers leave the industry.
 - We're losing good security officers because we are not getting the pay, the health care, and the support we need to make ends meet.
- The Aland Etienne Safety and Security Act would change my life. I would have stable pay. I could keep up with my bills.
 - I could take better care of my health, and not live in fear about what could happen if I get sick.
 - And I could focus on advancing in my career.
- Wherever you go in New York, security officers like me are working hard to make sure that you are safe.
 - We protect your homes, your offices, and your businesses.
 - We put our lives on the line to protect you and your livelihoods.
- We need to be able to keep ourselves safe, too.
- That's why we need the Aland Etienne Safety and Security Act.
- Thank you.

10.30.25 Testimony - Ibrahim Sène

- Good morning, thank you for having me here at City Council.
- My name is Ibrahim Sène. I work as a security officer at several store locations.
- At my job, I'm not just guarding against theft – but I also protect the employees and the customers.
 - I care a lot about keeping them safe.
- A lot of times I work late at night. It can be scary – anything can happen.
 - If someone comes into our store with the intent of breaking the law or becoming violent, I'm the first line of defense.
- But I don't feel like I always have the protections, wages and benefits that I need and deserve.
 - Every time I clock in at my job, I feel like I might be taking a risk in order to provide for my family.
- I am from Senegal and fighting to achieve the American Dream.
 - It gets difficult to do that with the cost of living always going up.
 - I work very hard.
- And I am here today because I know the Aland Etienne Safety and Security Act would give me more stability and support.
 - I would have healthcare, so I could take better care of myself.
 - Better training would help with things that happen on the job.
 - And I would have enough PTO to visit my family in Senegal.
- Aland's Act would help me be a better security officer. I could finally build my life and career here.

- I know many other security officers are in the same position.
 - I am standing here to fight not just for me, but for all security officers.
- We work hard to protect this city. Now, we are asking you to protect us.
- It's time to protect the protectors.
- It's time to pass the Aland Etienne Safety and Security Act.
- Thank you.

10.30.25 Testimony | Matilda Radinson

- My name is Matilda Radinson. I'm a proud Puerto Rican New Yorker, a 32BJ union member, and a security officer.
- I have been working in security at the Oculus One World Trade for more than ten years.
- And I am standing here today because having good, affordable healthcare literally saved my life.
 - I went through spinal surgery and cancer, and all of my treatments were covered.
 - I'm on my feet at work all day. It's hard on your body. Without spinal surgery, I wouldn't be able to walk.
 - And without the amazing cancer treatment and care I received, I don't know if I would be here today.
- I never had to choose between paying rent and getting the life-saving treatment and care that I needed.
- That's why I'm fighting for the Aland Etienne Safety and Security Act.
- Because there **ARE** thousands of security officers who are having to make those kinds of tough choices.
 - Many are having to work two or even three jobs just to get by.
 - That's not right.
- And it's burning people out. Our job is stressful.
 - We're on the frontlines. We're dealing with all kinds of incoming crises and emergencies.
 - That takes a toll on your mind, and your body.

- The combination of high stress and low pay means we're burning people out. We're losing good, experienced security officers every day.
- And as the kinds of threats we're facing change, security officers need training to do our job as best we can.
- Every day, I work hard to protect a major transportation hub and New York landmark.
 - In my ten years there, I have responded to all kinds of emergencies: fights, medical emergencies, terrorism threats.
 - If something does happen, it's my job to stand post – and to make sure that every single person in the building gets out safely.
 - Nowadays, I worry more and more about active shooters.
- I want to make sure that I have the tools to respond and to keep New Yorkers safe during any and every kind of crisis.
- And I want to make sure that while risking their lives, my fellow officers are not having to make the impossible choice between rent, food, and medical care.
- We need to stand by security officers. Stand with security, so we can keep standing for you – every day, in every crisis.
- Stand with us by passing Aland's Act.
- Thank you.

Security Legislation | 10.30.25 Testimony - Percy Guity

- Hello. My name is Percy Guity.
- I am a security officer at a building near Bryant Park.
- I have worked as a security officer for more than 20 years.
- I show up every day to keep New York safe and to provide for my family.
- Passing this bill can help workers like myself with my children's medical expenses because outside coverage is way too overpriced for us low-paid workers with high rent to pay and other obligations.
- My daughter suffers from seizures and the medical expenses are unbearable to maintain for a single father.
- I have my own health issues as well.
- The health insurance my company provides is expensive and doesn't cover much, so I've had to seek out my own private insurance. It's expensive too, but at least more things are covered.
- Every day, I am struggling to keep up with bills.
- And every year, it seems like the cost of living is going up.
- I am a hard-working single father in need of affordable health care.
- I want to be able to take care of my daughter and myself without worrying about the cost of a doctors' visit or medication.

- The Aland Etienne Safety and Security Act would help people like me who are fighting every day to protect you and this city – and to provide for our families.
- Thank you.

10.30.25 Testimony | Raven Skinner

- My name is Raven Skinner. I'm New York born and raised – from Manhattan. And I work as a security officer at 345 Park Ave.
- When I started working as a security officer a few years ago, I looked to my co-workers as examples.
 - I found a role model in Aland Etienne.
- Each and every day, Aland showed up with real drive and dedication.
 - I saw how much care and effort he put into our work – into keeping everyone coming in and out of our skyscraper safe.
- And pretty soon, I found out where his motivation came from.
 - I was usually the one to cover his post at the lobby while he went on break.
 - I always looked forward to it because I knew that during those 30 minutes, he'd be calling his family and children.
- I'm a parent too. I have two kids: my son is 9 and my daughter just turned 7.
- Aland cherished that time to speak with his kids.
 - And we all knew: Aland's drive, the energy he brought to work every day and his commitment to protecting the people in our building, was rooted in his motivation to provide for his kids – to support them and to show up for them.
- He was someone who uplifted others.
 - Every day, Aland inspired me to be a better security officer and a better parent.
- What happened on that July day is a tragedy.

- I was at home when I learned there was a mass shooting at our building.
- Later, I learned that Aland had passed. I was absolutely devastated.
- Aland showed up that day with the same dedication he brought every day.
 - He gave his life trying to protect the people he worked with.
- What I hope now is that more people can recognize Aland's example – and can see and recognize the *thousands* of officers just like him.
- **As security officers, we put our lives on the line every day to provide for our families and keep our clients and the city safe.**
- It's a job that requires *dedication*, and deserves recognition.
- The Aland Etienne Safety & Security Act offers us one opportunity to honor Aland's legacy.
 - With the support of Aland's family, this legislation would – in Aland's name – lift up all security officers across New York City.
- Aland's Act would strengthen public safety by helping to keep well-trained and experienced security officers around.
 - Aland will always inspire me. I hope he can inspire you, too.
- Let's honor his legacy by uplifting security officers – and one another.
- Let's pass Aland's Act.
- Thank you.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 10-30-75

(PLEASE PRINT)

Name: Dayton Nesbitt

Address: New City Plaza

I represent: Rockefeller Center

Address: 1230 6th Avenue

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10-30-75

(PLEASE PRINT)

Name: Calvin Baker

Address: _____

I represent: Street Vendor Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10-30-75

(PLEASE PRINT)

Name: Mahmoud Zaid

Address: _____

I represent: Street Vendor Project

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10-30-75

(PLEASE PRINT)

Name: Mohamed Attia

Address: _____

I represent: Street Vendor Project

Address: New York NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10-30-75

(PLEASE PRINT)

Name: A Long Yan

Address: _____

I represent: Street Vendor Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 11/14/75

(PLEASE PRINT)

Name: Guadalupe Sosa

Address: _____

I represent: Street Vendor Project

Address: _____

Please complete this card and return to the Sergeant-at-Arms

Spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Xochitl Camacho

Address: _____

I represent: SVP

Address: _____

Spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Cheryl

Address: _____

I represent: SVP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: FELIX MALAVE

Address: [REDACTED] MANHATTAN AVENUE Apt 4

I represent: Bras, New York 10467-3727

Address: 646 377 9247 FAX 7727 12 / 11/22/2011

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Manny Pastreich

Address: _____

I represent: SEIU 32BJ

Address: 25 W 18th St

available
at 12 noon

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Lauren Melodia

Address: 497 Quincy Street

I represent: Center NYC Affairs

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Raven Skinner

Address: New York NY 10029

I represent: In Support 32BJ

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10.30.25

(PLEASE PRINT)

Name: Theodore Moore

Address: 42 Bway

I represent: ALIGN

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Cassandra Gomez

Address: _____

I represent: National Employment Law Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Lilia Gong

Address: _____

I represent: Local Progress Impact Lab

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☐ in favor ☒ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Stephen Amitay

Address: 444 N. Capitol St. NW WDC 20001

I represent: National Assoc of Security Companies

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Enrique Lopez

Address: _____

I represent: UC Berkeley Labor Center

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Rachelle Paoli

Address: [Redacted] Brooklyn NY

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10-30-2025

Name: TREVENA GARZA (PLEASE PRINT)

Address: [REDACTED] BKLYN

I represent: 32BJ Thomas SHUTMAN TRAINING FUND

Address: 25 WEST 18 ST NYC

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

1391

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 10-30-2025

Name: BADRUN NAHAR (PLEASE PRINT)

Address: [REDACTED] SHEPHERD AVENUE

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

Name: PERRY GUILTY (PLEASE PRINT)

Address: [REDACTED] BKLYN NY 11217

I represent: 32BJ

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10-30-25

(PLEASE PRINT)

Name: Matilda Radinson

Address: _____

I represent: 32 BS

Address: 25 W 18th street.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 1391

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Clarissa Baynes

Address: _____ Bklyn, NY 11206

I represent: 32 BS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1391 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Shane Mitchell

Address: _____ NY 10036

I represent: Hotel and Gaming Trades Council

Address: 707 8th Ave NY NY 10036

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 1391

☒ in favor ☐ in opposition

Date: 10/30

(PLEASE PRINT)

Name: Karla Walter

Address: _____

I represent: Center for American Progress

Address: 1333 H St NW Washington DC

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Ibrahima Sene

Address: _____

I represent: NAARRA

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 1391

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Ken Prashad

Address: 611 Jackson Ave

I represent: Ad H Security

Address: 611 Jackson Ave Bx NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 1391

☒ in favor ☐ in opposition

Date: 10/30

(PLEASE PRINT)

Name: Dennis Fan

Address: [REDACTED] New York, NY 10027

I represent: _____

Address: _____

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/21

(PLEASE PRINT)

Name: Christopher / Leon Johnson

Address: [REDACTED]

I represent: Self

Address: _____

◆ Please complete this card and return to the Sergeant-at-Arms ◆