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TESTIMONY

BY

COMMISSIONER KEVIN D. KIM

NYC

DEPARTMENT OF SMALL BUSINESS SERVICES

BEFORE

THE COMMITTEE ON SMALL BUSINESS

OF THE

NYC COUNCIL

TUESDAY, MARCH 12, 2024



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Good morning **Chair Feliz** and members of the Committee on Small Business. My name is **Kevin D. Kim**, and I serve as the Commissioner of the **NYC Department of Small Business Services (“SBS”)**. Joining me today are SBS’s Executive Deputy Commissioner for Programs, **Dynishal Gross**, and Executive Deputy Commissioner for Administration, **Michael Forte**. We are pleased to offer our testimony on SBS’s **Fiscal Year 2025 (FY25)** budget.

A RECORD-BREAKING RECOVERY

New York City has experienced a remarkable resurgence. Mayor Adams’s prudent fiscal management coming out of the pandemic has led to record-breaking job levels and improved bond ratings. These indicators showcase the success of the Mayor and Deputy Mayor Maria Torres-Springer’s vision outlined in the *Blueprint for NYC’s Economic Recovery*, through which small businesses play a central role in shaping the “City of Yes.” Today, I am proud to highlight SBS’s significant contributions to the recovery through pioneering initiatives such as the NYC Small Business Opportunity Fund and the creation of the first-ever AI Chatbot designed to assist small businesses.

I also want to recognize the vital partnership between City Council members and SBS. Many of our achievements stem directly from our work together. In coordination with your offices, I have personally visited small businesses in all 51 council districts with virtually every council member. Thank you for your warm hospitality during these visits and your collaboration throughout the year.

PRELIMINARY BUDGET OVERVIEW

SBS’s FY25 Preliminary Budget stands at **\$173.9M**, of which **\$34.3M** or **19%** is allocated to Personal Services (PS). Of the total budget of **\$173.9M**, approximately **\$70.1M** or **40%**



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represents pass-through funding for other City entities, including the NYC Economic Development Corporation (**\$36.7M**), NYC Tourism + Conventions (**\$17.4M**), and the Trust for Governors Island (**\$16M**). As a conduit to these entities, SBS does not manage or spend any of these funds.

The budget allocates **\$103.8M** to SBS programs, personnel, and services, but excludes the extensive discretionary contract portfolio typically added by Council at the Adopted Budget in June. Currently, SBS’s budgeted headcount stands at **346**, with **167** filled since the start of the Adams administration.

Our dedicated team at SBS carefully manages these resources to deliver programs that connect New Yorkers to good jobs, create stronger businesses, and build vibrant neighborhoods. This work is conducted through SBS’s four major program divisions: the **Division of Business Services (“DBS”)**, the **Division of Economic and Financial Opportunity (“DEFO”)**, the **Workforce Development Division (“WDD”)**, and the **Neighborhood Development Division (“NDD”)**. Additionally, we oversee specialized experts and teams, including **Cannabis NYC**, **NYC Office of Nightlife**, **NYC Food & Beverage Industry Partnership**, **Waterfront Permits**, **Women Entrepreneurs NYC (WE NYC)**, and **Black Entrepreneurs NYC (BE NYC)**.

BUSINESS SERVICES

Our **DBS** division offers an array of free business services, connecting entrepreneurs with financing opportunities, business courses, mentorship, legal assistance and more. Notably, we launched last year the NYC Small Business Opportunity Fund in partnership with Goldman Sachs and the Mastercard Center for Inclusive Growth. This initiative, the largest public-private effort in city history to support small businesses, has facilitated over **\$85M** in low-interest loans to more than **1,000** small businesses through collaboration with **eight** community development financial institutions (CDFIs).



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Recognizing the systemic challenges faced by businesses owned by people of color and immigrants in accessing financing, we intentionally designed the Opportunity Fund to mitigate these barriers by eliminating traditional obstacles such as application fees and minimum credit score requirements. We also employed targeted outreach strategies – in language – in communities throughout the five boroughs. We reached over **500** businesses in historically-underserved neighborhoods with door-to-door outreach, including more than **120** Bronx-based businesses on launch day.

As a result, approximately **80%** of the Fund’s loans were awarded to minority- or women-owned businesses, with **69%** going to businesses owned by self-identified Black, Indigenous, and People of Color (BIPOC) New Yorkers. That **69%** represents more than double the rate at which BIPOC businesses access capital through the federal **Small Business Administration**. Moreover, **59%** of the awards went to businesses in Low- to Moderate-Income (LMI) neighborhoods. Finally, another data point that demonstrates the success of our outreach effort is that while the Bronx represents **8%** of small businesses in NYC, Bronx businesses received **14%** of Opportunity Fund loans and businesses in every City Council district received funds as well. This underscores SBS’s unwavering commitment to overcoming historical inequities and fostering inclusive economic growth.

One notable beneficiary of the Opportunity Fund is the husband-and-wife team behind Buunni Coffee, **Sariana and Elias Prabasi**, who received over **\$100,000** to expand their Washington Heights and Inwood-based business operations. They will use these funds to open a coffee roastery in the Bronx, expanding from serving coffee at their four cafes to supplying coffee beans throughout New York City and giving more businesses the opportunity to cut costs and roast their own brew. Their story exemplifies the transformative impact of strategic financing on local economies and the powerful role small businesses have, not just to create wealth, but provide something special for our neighbors.



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MINORITY AND WOMEN-OWNED BUSINESSES

SBS's DEFO division facilitates opportunities for Minority and Women-owned Business Enterprises (M/WBEs) by providing certification, technical assistance, and capacity-building training. We collaborate with City agencies to connect M/WBEs with contracting opportunities, supporting their participation in the city's procurement processes. Our year-round efforts culminated at the **15th** Annual Citywide Procurement Fair, where the administration announced a record **\$6B** awarded to M/WBE firms in **FY23**. Nearly **three-quarters** of all M/WBEs awarded city contracts utilized SBS services, reflecting our commitment to facilitating their success.

One such success story is that of **Ibrahima Badji**, a first-generation Senegalese-American entrepreneur, whose company **Good Vibes** supports high-school students in pursuing debt-free higher education. Through SBS's direct assistance, Mr. Badji secured **five** government contracts totaling **\$50,000**, enabling him to expand his impactful initiatives and contribute to his community's well-being and our city's greatest mission: serving our children.

In alignment with Mayor Adams's vision and legislative efforts led by Chief Business Diversity Officer Michael Garner, the administration increased the dollar value of M/WBE non-competitive contracts initially from **\$500K** to **\$1M**, and then again this year from **\$1M** to **\$1.5M**. Using this method in **FY23**, the city unleashed a record-setting **\$175M** in contracts awarded to M/WBEs – a **60%** increase over the prior year. Moreover, at SBS, we expanded the Contract Financing Loan Fund program to provide an additional **\$50M** in low-interest funding, which will support **350** vendors to fulfill **\$600M** in city contracts over the next two fiscal years.

WORKFORCE DEVELOPMENT

NYC's greatest asset is our talent. SBS's **WDD** division plays a pivotal role in connecting jobseekers with employment opportunities and assisting businesses in fulfilling their workforce needs. Through our network of **18 SBS Workforce1 Career Centers** across the five boroughs,



we provide free job placement services, career coaching, and training programs. In **FY23**, we helped **23,599** New Yorkers get a job or advance their career.

SBS's efforts contributed to the recovery of nearly **1M** jobs lost during the pandemic, exemplifying the resilience of New York City's workforce and the dedication of our incredible SBS team. One success story I'd like to share is that of military veteran **Rudy Cazares**, who partnered with SBS to expand his logistics company in the Bronx, hiring **49** local residents through Workforce1. Our collaborative efforts with community partners have further enhanced our ability to connect job seekers with diverse employment opportunities, fostering inclusive economic growth.

NEIGHBORHOOD DEVELOPMENT

NDD oversees our neighborhood development initiatives and supports NYC's network of **75** Business Improvement Districts (BIDs) which serve nearly **300** miles of commercial corridors and invest more than **\$187M** into local economies. In the Adams administration, we have allocated approximately **\$27M** in grants to over **100** community-based organizations, spurring commercial corridor revitalization efforts. Examples of the impact of these grants include the installation of seasonal Ramadan lighting by Brooklyn's Bay Ridge 5th Avenue BID, neighborhood beautification efforts by Morris Park BID in the Bronx, and enhanced district marketing by East Brooklyn BID.

Brooklyn's Bay Ridge 5th Avenue BID, for example, used their BID grants to install seasonal Ramadan lighting along **20** blocks and over **400** storefront businesses, while Morris Park BID in the Bronx doubled down on neighborhood beautification by planting **47** guarded tree pits, cleaning up over **100** tree pits, and installing **10** planters along their commercial corridor. East Brooklyn BID leveraged their funding to boost business-to-business marketing and reached over **7,000** people on Facebook. These initiatives not only enhance the aesthetic appeal of commercial districts but also stimulate economic activity and create safer neighborhoods.



PARTNERSHIP WITH THE COUNCIL

Our partnership with the City Council has been instrumental in advancing initiatives to support small businesses and reduce regulatory burdens.

This year, the Council passed **Intro. 845-2023**, a critical component of the Mayor’s “Small Business Forward” initiative to cut red tape. With this legislation signed by the mayor, the administration has implemented **over 90** reforms to lower fines, create cure periods, and institute first-time warnings, putting dollars back into the hands of business owners to reinvest in their businesses and communities.

Building on the City Council’s “One Stop Shop” portal, enacted into law in October 2022, we launched the SBS Business site on the MyCity portal with a first-in-the-nation AI chatbot to help business-owners navigate City government. The new AI chatbot serves as a 24-hour executive assistant, saving business owners and entrepreneurs time and money by instantly sharing actionable and trusted information from more than **2,000** NYC Business web pages and articles, in the top ten languages spoken in NYC.

Additionally, this committee helped to bring the Office of Nightlife (ONL) to SBS from the Mayor’s Office of Media and Entertainment through legislation. The ONL team is right at home at SBS, working across our divisions to support the **\$35B** industry.

As we work together to modernize government services and support local communities, I am proud to also have great relationships with the Community Boards, BIDs, Chambers of Commerce, merchant’s associations, community-based development organizations, immigrant-focused advocacy groups, consular corps, and non-profits in each of your districts. The City Council provides a bridge for our agency to so many local organizations and I am eager to continue this partnership.



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CONCLUSION

In conclusion, SBS remains steadfast in its commitment to Mayor Adams's economic agenda, centered on equity and inclusivity, with small businesses leading our recovery efforts. We look forward to working with the Council to advance our shared goals. Thank you for the opportunity to testify, and we welcome any questions you may have for me or my team.

Thank you.

Testimony of New York City Employment and Training Coalition (NYCETC)

New York City Council Budget and Oversight Hearings on the Preliminary Budget for Fiscal Year 2025

SMALL BUSINESS COMMITTEE

Submitted by Gregory J Morris, CEO

March 12, 2024

I'd like to thank **Council Member Feliz** for his leadership and the opportunity to provide testimony. I'm Gregory J Morris, CEO of the New York City Employment and Training Coalition (NYCETC) - *the largest city-based workforce development association in the country*. NYCETC serves as the 'industry voice' of more than 220 workforce development providers in New York City who are counted on to provide job training to more than 500,000 New Yorkers each year — *primarily individuals who live in under-resourced and underserved neighborhoods*. **The most recent survey of our membership indicated that the majority of providers were focused on meeting the needs of women, young adults, NYCHA residents, immigrants/refugees/asylum seekers, and justice-involved individuals.** It is our coalition that is relied upon to connect New Yorkers - of all ages - in every borough - to quality jobs and a living wage; and the services and support necessary to secure long-term, family-sustaining employment.

To achieve an effective and sustainable workforce development ecosystem in NYC, NYCETC is called upon to take three actions:

1. Track the value/impact of the commitments that the City administration makes in support of job readiness and training;
2. Serve as a resource to employers and employer intermediaries seeking talent; and
3. Advocate for the budgetary, legislative, and regulatory action items that maximize access and equity in the programs and services that are central to our efforts. *These efforts include industry specific skill development, college and career exploration, internships and apprenticeships, reskilling/upskill options, as well as, employment placement, retention and advancement assistance.*

Specific to the [Fiscal 2025 Preliminary Plan and the Fiscal 2024 Preliminary Mayor's Management Report for the Department of Small Business Services](#), we want to highlight/comment on the following:

FROM THE REPORT: "The Preliminary Plan PEGs will have a negative impact on services at SBS. The PEGs affect SBS' Business and Workforce programs.... This will lead to a reduction in services provided, including training cohorts for the food service job-training program as well as a reduction in the number of trainees for the Construction Safety Trainings."

COMMENT: Our training providers are actively involved in preparing New Yorkers for employment in

growing industries and occupations in New York City including tech, health care, construction and food/hospitality. Our [landscape report](#) provides detail on training provided by NYCETC. We continue to seek to engage with the Mayor's Office of Talent and Workforce Development and the Department of Small Business Services (SBS) to coordinate our efforts to meet the training needs of New Yorkers and partner with employers.

FROM THE REPORT: "The Department has experienced a significantly high vacancy rate in recent years. As of the Fiscal 2024 Adopted Budget, vacancies hit a high of 19.8 percent. The SBS vacancy rate has improved since Fiscal 2024 Adoption; however, it is still approximately two times higher, 12.7 percent, than the citywide average of 5.5 percent."

COMMENT: As the primary driver of the City's efforts to support training and employment placements, it is essential that SBS is fully staffed.

New York City's workforce is the backbone of its economic success. Whether it's the New Yorkers who drive our local economy today, or the young people who will make up our future workforce, the City of New York does better when its people have access to the resources and education they need to access good paying jobs that sustain them and their communities. New York City's workforce development system is as diverse and ambitious as the city itself, yet there are still too many systemic barriers and disconnections that hold us back from a truly inclusive economy. To equalize opportunity for all New Yorkers, I respectfully request that the Council invests in workforce development now while leading efforts to increase access to quality jobs over time by following this 10 point plan:

- **Commit to restoring all reductions in job training and workforce development opportunities for unemployed and underemployed New Yorkers.** In [Executive Order 22](#), this administration identified investment in the City's talent and workforce development system as "critical to an inclusive economic recovery that benefits City residents, employers, and the economy." PEGS that reduce or eliminate programs and services focused on preparing New Yorkers - especially economically disadvantaged New Yorkers - for current and future employment opportunities are misaligned with the priorities of the administration and will have a deleterious effect on the City's economic growth. An independent analysis on the [Return of Investment \(ROI\) on Industry-focused Job Training Programs](#) detailed the value of these programs: 1) These programs lead to 1) significant increases in earnings over time; and 2) have both positive returns in 5 and 10-year ROI estimates;
- **Protect the pathways to continuing education and literacy in New York City including CUNY and public libraries.**
- Address the [municipal job vacancy rates](#) by establishing a [Small Business Services and Workforce Development Initiative](#) that will result in a **first-of-its-kind Civil Service Pathways Apprenticeship** for young adults interested in the city workforce.
- Provide funding for existing or planned **business-training providers networks that can serve as "one-stop shops" to support job seekers** in neighborhoods where there is either

planned economic development and/or the absence of targeted workforce development resources like Workforce1 Center and/or Jobs Plus.

- **Equip City Council District Offices** with up-to-date information about job training/hiring within the district and borough to connect constituents to connect constituents to accessible job training and employment placement opportunities;
- Expand the capacity of job training providers serving new arrivals to meet the current and future needs of employers with significant vacancies through **contextual training opportunities and coordinated work authorization effort**.
- **Increase Access to Commercial Delivery Licenses (CDL)** by funding programs that expand and diversify the pool of trained drivers with an important focus on attracting young people and individuals from underserved and immigrant neighborhoods in New York City.
- Assist public assistance beneficiaries to secure credentials and certification through a **“Bridge to Tech” program** focused on academic remediation, training in the foundational skills required for a career in IT services, and access to on-going supportive and retention services.
- **Launching a City Council Sub-Committee [Task Force] on Workforce Development Results/Outcomes** - The Adams administration has identified a desire to reach 5,000,000 jobs by 2025. This interest follows the completion of the [Pathways to an Inclusive Economy: The Future of Workers Task Force Blueprint](#). Currently, there is no accountability at any level of NYC government specific to employment outcomes and results. A sub-committee could track employment, wages, return on investment, and equity and inclusivity measures related to occupations/industries in NYC.
- **Invest in a 5% COLA for Human Services Workers** - We thank the City Council for the \$100M workforce investment for the last two years and the \$50M investment next year, which is a step in fairly compensating frontline workers. However, the workforce investment is not a true cost-of-living adjustment (COLA) with a guaranteed percentage increase for all contracted human services workers. A COLA is a significant step to address the historic underfunding and lack of investment in the human services sector as these workers do some of the most important jobs in our communities yet are underpaid and undervalued.

All of the above efforts and initiatives are central to the interests and expertise of the NYCETC members. A short summary of NYCETC’s accomplishments over the last year are provided on the following pages. Please accept my sincere thanks for the opportunity to testify. I am accessible through email gmorris@nycetc.org and phone/text - 646-469-2683.

NYCETC ACCOMPLISHMENTS IN 2023

In the last year, NYCETC accomplished the following:

- Connected with membership (through the [conference](#), [happy hours](#), and [member orientations](#)) and improved [communications](#). NYCETC's primary communication tool- [Workforce Weekly](#) reaches an audience of more than 6,000 each each week.
- Positioned as a partner to key intermediaries ([NYATEP](#), WPTI, JobsFirst), developed relationships with [elected officials](#), and collaborated with research institutions ([Center for New York City Affairs](#) and Center for an Urban Future (CUF)) NYCETC serves as a partner on CUF's Borough Series - *Helping New Yorkers Access Tech Careers*.
- Worked with the [current administration](#) and [challenged it](#) as a member of the [Future of Workers Task Force](#). NYCETC has cultivated relationships with key agencies (DYCD, SBS, HRA, DDC, and DCAS) as well as MOCS and the Mayor's Office of Nonprofit Services. NYCETC partners with the [Mayor's Office for Economic Opportunity](#) to develop an employer-facing digital "front door" to strengthen the public workforce system and [NYCEDC](#) to support community hiring initiatives.
- Launched a new employer network (modeled on LESEN) on the west side of Manhattan West Side Work Coalition) in partnership with the City Council Speaker's Office and Council Member Erik Bottcher. Media related to the announcement can be found using the following links: [amNY](#) and [Patch](#). To support outreach to employers/organizations and community members, the Council Member's Office put out an email blast that can be found [here](#).
- NYCETC has engaged in regular briefings with local and state officials since October 2022 and attended the National Skills Coalition Summit in Washington, D.C. to meet with federal legislators in May 2023.
- In September 2023, NYCETC hosted a [briefing](#) on the cannabis industry for the Black, Latino, Asian Caucus of the City Council.
- NYCETC attended [SOMOS](#) in Puerto Rico in November 2023. NYCETC served as a program partner at the Human Services Reception and the AAPI reception.
- In December 2023, NYCETC hosted the [2023 Annual Conference](#), "Creating Quality Jobs through Partnership and Policy" featuring nearly 400 guests and more than 60 panelists. This [event](#) was co-sponsored by Civic Hall and City & State. The event began with a legislative breakfast attended by Council Members. Featured speakers included Deputy Mayor Maria Torres-Springer, Chancellor Felix Matos Rodriguez, Chancellor David Banks, Kevin D. Kim, Commissioner, New York City Department of Small Business Services, Douglas Lipari, Executive Director, Community Hiring, City of New York, and Dawn Pinnock, Commissioner, New York City Department of Citywide Administrative Services. Video of featured sessions from the conference can be found [here](#). Abby Jo Sigal, Executive Director, NYC Mayor's Office of Talent hosted a specific panel on the workforce development ecosystem with all relevant city agencies. Video of that session can be found [here](#). James Parrott, Director of Economic and Fiscal Policies at the Center for New York City Affairs at The New School presented on the current state of the post-pandemic recovery. Video of that session can be found [here](#).



TESTIMONY OF VOLUNTEERS OF LEGAL SERVICE
New York City Council Committee on Small Business
Oversight: Preliminary Budget Hearing
March 12, 2024

My name is Nick Aquino and I am a Staff Attorney with the Microenterprise Project at Volunteers of Legal Service (“VOLS”). VOLS is a legal services nonprofit founded in 1984. Our mission is to bridge the justice gap in underserved communities through increased pro bono legal services. For over 20 years, the VOLS Microenterprise Project has helped existing and aspiring small business owners and entrepreneurs access high-quality free legal services from our dedicated staff and our network of pro bono attorneys. VOLS helps small business owners with transactional small business legal needs, including entity formation, drafting and reviewing contracts, and understanding industry-specific regulations. We partner with community economic development organizations and City government, particularly Small Business Services (“SBS”), to connect with clients who would benefit from our legal assistance, focusing on minority-, women-, immigrant-, and veteran-owned businesses.

For many New Yorkers in under resourced communities, entrepreneurship provides an opportunity—sometimes the *only* opportunity—to build wealth for themselves and future generations. Many of our clients develop businesses for the express purpose of handing it down to their children. This form of generational wealth is often only made possible when the nonprofit sector and local government work together to support these entrepreneurs. Beyond the direct benefits small business ownership provides for the owner and their families, a thriving small business ecosystem strengthens the wider local community as well. Small businesses create jobs, of course, but they also anchor communities. They help foster a sense of pride and identity in one’s



neighborhood, creating a shared purpose among residents to actively participate in their community's development and support its long-term prosperity. Many of our clients operate neighborhood institutions—delis, cafes, barbershops, etc.—that serve the dual purpose as a community space that simply cannot be replicated by corporate chains or well-funded businesses that parachute in.

As a legal service provider for under resourced entrepreneurs, VOLS is acutely aware of the barriers many face in realizing their entrepreneurial dreams. While we strive to provide comprehensive pro bono legal services for as many New York entrepreneurs as possible, we cannot solve this problem alone—leveraging City resources is essential. For example, on February 28th VOLS launched its partnership with SBS's Black Entrepreneurs NYC program at Restoration Plaza in Bedford Stuyvesant. There, VOLS facilitated a presentation by a top New York City law firm on entity selection and other fundamental business-legal considerations to an audience of Black entrepreneurs—a community that is vastly underrepresented in New York City's business owner community. The audience was not only engaged in the presentation itself, but also received actionable information from SBS officials on resources available through the agency.

It is exceedingly rare that our clients come to us solely for help with a legal issue. Instead, they need a full suite of technical assistance: marketing, financing, accounting, etc. To serve these needs we rely on essential SBS and other City programs. For example, SBS's financing assistance programming offers our clients—who are often locked out of traditional forms of financing—a necessary lifeline. Similarly, without well-resourced social networks due to historic discrimination, our M/WBE certified clients benefit greatly from SBS's procurement opportunities. In many cases, they would not have been able to get off the ground without



opportunities for government contracting facilitated through SBS.

In sum, small businesses improve the lives of the owners, the employees, and the larger New York City community. Without City government services to reduce the barriers to entry of under resourced entrepreneurs, the dream of small business ownership in New York City would be the exclusive purview of the wealthy and well-resourced. In addition, without your support in the form of discretionary funding VOLS would not be able to bring free legal services to New York City' entrepreneurs. Thank you for the opportunity to submit this testimony.

Nick Aquino, Esq.
Staff Attorney
Volunteers of Legal Service



March 12, 2024

**Testimony of Randy Peers
President and Chief Executive Officer
Brooklyn Chamber of Commerce**

Before the

New York City Council
Committee on Small Business
Preliminary Budget Hearing

Thank you, Chairman Feliz and the rest of the Small Business Committee members, for the opportunity to submit testimony today.

My name is Randy Peers and I serve as the President and CEO of the Brooklyn Chamber of Commerce, the borough's leading economic development organization. The small businesses of our City have been through a tremendously stressful and turbulent few years, and the Brooklyn Chamber is pleased to partner with allies, both private and public, on key initiatives to preserve and sustain these vital components of our communities.

The Brooklyn Chamber of Commerce promotes economic development across the borough and advocates for its member businesses. Our mission is to stimulate a healthy and robust business environment throughout Brooklyn by helping small and local businesses access education services, loan guidance, legal assistance, employee screenings, and regulatory advising. The Brooklyn Chamber of Commerce is the foremost resource for doing business in Brooklyn, respected as a leader in advancing public policy, new technologies, products, services, and programs that support and promote a vibrant local economy.

The Brooklyn Chamber is a non-profit and supports a range of essential public programs for small businesses. We are the long-standing operator of the NYC Business Solutions Center in downtown Brooklyn. Thanks to support from the City Council, we provide Chamber services to businesses throughout Brooklyn.

In addition to these efforts, the Brooklyn Chamber of Commerce is a proud member of the New York City Small Business Resource Network, launched in October 2020, a public-private partnership. This unique service-delivery model places over 50 Business Support Specialists on the ground across the five boroughs to help businesses connect to free resources offered by both the public and private sectors and provide onsite support to small businesses. Since its inception, the Small Business Resource Network has served over 42,000 businesses across

New York City. In Brooklyn, the SBRN has served and visited close to 9,500 businesses, 83% of which are MWBE-owned.

While the Five Chambers are grateful for the investment the Council made in our programs last year, we hope that the NYC Council will continue funding the following initiatives at the level needed to sustain this important work moving forward.

First, the FY25 Preliminary Budget did not include any support for the SBRN. We respectfully request a \$500,000 restoration of the Five Borough Chamber Alliance Initiative, and restoration of the \$1.5 million one-shot included in the SBS budget in FY24, which will help us expand the NYC SBRN and focus on underserved commercial corridors in each borough. Enhanced support is especially important as pandemic-related funding will expire this year.

Second, a restoration of \$351,590 for the *Chamber on the Go* Initiative to allow the Chamber to continue bringing services directly to businesses across the borough. The goal of this outreach is to assist business owners who cannot leave their businesses, while simultaneously building a robust business environment throughout Brooklyn.

Lastly, the Brooklyn Chamber of Commerce respectfully requests \$150,000 from the Council Speaker (and Brooklyn Delegation) for *Brooklyn Chamber in Your Neighborhood* – direct services to reimagine commercial corridors, provide M/WBE certification and procurement assistance, foster tourism, and expand the usage of the Brooklyn Commerce Network.

I am proud of the work the Brooklyn Chamber has accomplished and we look forward to continuing and expanding this work in the months to come. Thank you again, Chairman Feliz and members of the committee for hearing my testimony today. I look forward to our ongoing collaboration in service of the City's resilient small business community.

Randy Peers

President & CEO

Brooklyn Chamber of Commerce

rpeers@brooklynchamber.com

718-875-1000 x 101



Dear Chair Feliz and members of the Committee on Small Business,

My name is Jessica Rose and I am testifying on behalf of Brooklyn Legal Services Corporation A ("Brooklyn A").

We represent small businesses in commercial lease negotiations; community groups and non-profits that need legal support for their startup, expansion and success; worker-owned cooperatives and solidarity economy projects building more equitable ways of working and living; and community activists fighting for equity for their communities and building grassroots power in movements for racial and economic justice. Our legal support gives our clients a greater chance of survival in an economic climate where many community-based non-profit organizations operate on shoestring budgets with few resources for legal support, and nearly 50% of new business establishments don't make it past five years.

For almost five decades, Brooklyn A had a robust service area of supporting non-profit clients, including small to midsize health centers, schools, and community development corporations. The focus of our Community and Economic Development program shifted to small businesses over the last six years as we partnered with the New York City Department of Small Business Services (SBS) to provide legal services through the Commercial Lease Assistance program. Small businesses are the fabric of the NYC economy, with an estimated 670,000 people working at micro-businesses (fewer than 20 employees) in the city. Today, both our small business work and our non-profit legal support are critical to protecting and preserving communities against displacement and gentrification.

Brooklyn A's commercial real estate services—including negotiating new or renewal leases, terminations, or sublets; enforcing the terms of a lease or other agreement with a landlord; negotiating rent reductions and payment plans when commercial tenants fall behind on rent payments; and combating harassment or breach of contract—help level the commercial lease playing field and prevent displacement due to ongoing gentrification as

building communities ensuring opportunity achieving justice.



well as the consolidation of commercial space in the hands of fewer and larger national chains and corporations. Protecting small businesses ultimately improves a neighborhood's long-term economic outlook.

For Fiscal Year 2025, Brooklyn A is seeking funding for our Community and Economic Development program, which provides legal support for small businesses and nonprofits across the five boroughs, and calling for a continuation of the Department of Small Business Services (SBS) Commercial Lease Assistance (CLA) Program. This year, we are applying for \$175,000 under the Neighborhood Development Grant Initiative, Community Safety & Victim Services, and local and anti-poverty discretionary funding (reference number 163755).

Last fiscal year our small businesses program provided services on 1,334 small business matters. We provided assistance to businesses in every City Council district in NYC in FY22 and all but one City Council district in FY23. Each and every one of these neighborhood businesses plays its own crucial role as a part of their communities. Our small business team works closely with SBS and with a network of CBO partners to conduct outreach and intake citywide. We've partnered with these community organizations to host virtual and in-person events to connect us with prospective clients and receive referrals.

Brooklyn A also takes referrals from elected officials. We implemented an online referral portal for elected officials to refer constituents to our office directly into our legal database, improving efficiency of communication and information sharing. We have trained dozens of state and city officials' offices to use this portal. In FY2023, Brooklyn A staff organized and participated in 58 educational and outreach events and reached approximately 2,600 individuals; 24 of those 58 events were part of the Community and Economic Development program.

The Commercial Lease Assistance program is vital for city small businesses, but can be further improved. First and foremost, we call for continued funding of the program,

building communities *ensuring opportunity* **achieving justice.**



immediate issuance of a Negotiated Acquisition Extension agreement to ensure continuity of services, and the timely issuance of a Request for Proposals for a new contract cycle.

Second, while Brooklyn A appreciates the partnership and efforts of the SBS team in conducting outreach to potential small business clients, Brooklyn A believes the CLA Program needs additional marketing assistance from the City to be successful. Brooklyn A is not as well equipped as SBS to reach large numbers of businesses with information about the program; fundamentally, Brooklyn A is a legal service provider and not a marketing firm. With additional investment in, and management of, the marketing of the CLA program by SBS, we could dramatically increase our services to small businesses across the city by making more business owners aware of these critical services.

And thirdly, many small businesses are struggling with landlord lawsuits because they fell behind in paying their rents—sometimes by just a few thousand dollars. The CLA program does not allow Brooklyn A to litigate on behalf of our clients. Most small businesses cannot afford to pay for additional support for court appearances and litigation, and Brooklyn A has repeatedly observed that landlords exploit this vulnerability to evict long-time tenants to dramatically increase rents, even if it means keeping their storefronts vacant for months while they seek out tenants who might be able to pay more. Several options would allow for an increase in small business support in a litigation capacity on a trial or pilot basis:

- Allowing CLA counsel to appear in court to finalize and file agreements that have been negotiated out of court;
- Allowing CLA counsel additional permission to subcontract with legal service providers that can support small businesses in litigation;
- Allowing CLA counsel to appear in court for a targeted class of small business clients, such as veterans, people affected by carceral system, or business owners engaged in legal cannabis sales.

I'd like to also say a few words about the other CED work done by Brooklyn A. We represent community-based nonprofit organizations, small businesses outside of the CLA program,

building communities *ensuring opportunity* **achieving justice.**



worker cooperatives and other solidarity economy projects, and movement groups fighting for equity for their communities.

In calendar year 2023, we represented 40 of these clients, plus provided another 15 referrals to pro bono programs at large law firms. Our highlights from the year include:

- Providing services to nonprofit organizations that have been serving migrants during the current crisis;
- Supporting street vendors in Queens and Brooklyn;
- Providing legal assistance to cannabis retailers, especially those who were adversely impacted by incarceration because of drug enforcement;
- Providing legal support to worker cooperatives, including some of the largest worker co-ops in New York City, and worker co-ops providing dozens of good-paying jobs to working class people in communities of color.

We have also been rebuilding our historic partnerships with larger community-based organizations, and we are very proud to do some of the legal work necessary to support the efforts of long-time community institutions like Cypress Hills LDC, Central Brooklyn Economic Development Corp, and Neighborhood Housing Services of Queens.

We thank you for consideration of our suggestions on how to improve the CLA Program and we hope you will support our work serving small businesses and nonprofits across the city in the coming year.

Thank you,

Jessica A. Rose

Executive Director

Brooklyn Legal Services Corporation A

jrose@bka.org

building communities *ensuring opportunity* **achieving justice.**



**NYC City Council Committee on Small Businesses
March 12, 2024**

Testimony of Carina Kaufman-Gutierrez
Deputy Director, Street Vendor Project at the Urban Justice Center

Good afternoon Chair Feliz and Committee members. My name is Carina Kaufman-Gutierrez. I am the Deputy Director of the Street Vendor Project, a membership-based organization of over 2,900 street vendors - thank you for the opportunity to testify. As the only organization that exclusively serves street vendors in New York City, SVP is the centralized hub for this underserved population, providing critical small business and legal services to vendors since 2001.

We respectfully request support from New York City Council to sustain and expand our essential Small Business Empowerment Program (158996) and Community Outreach and Education for Street Vendors (158917) for street vendors. The demand for street vending education and services continues to grow, as the population transformed during the pandemic and continues to increase as many asylum seekers are beginning to vend. It is critical there be an investment in education and training in these emerging small business owners to help them know their rights and responsibilities, which SVP is primed to do.

We are the one stop shop for street vendors that provide them not only legal representation when they receive a ticket, but help them to navigate complex street vending laws in seven languages - Arabic, Bangla, Spanish, Mandarin, English, French and Wolof - and offer trainings to build their skills to grow your street vending businesses.

Despite being a small team of just 3 full-time organizers, 2 part time, and 1 lawyer on staff, in just the first 8 months of this fiscal year we have supported

- **414** individual vendors with individual consultations on topics ranging from sales tax filings to filing loan applications to negotiating catering contracts. Of these, in the past year, 57% of our small business consultations were conducted in Spanish, 20% in Mandarin, 14% in English, 5% in Arabic, and 3% in Bangla. 59% of our consultations were with female vendors.
- **708** individual vendors who we engaged through street outreach and resource fairs in order to connect them to services, often with a fellow SVP member alongside us to build continue building trust when so many have faced scams in the street vending world
- We also hold **monthly** workshops at our membership meetings, with regular attendance of 50-75 individuals - tonight's for example is on registering for e-payment systems

Each of these engagements is with the purpose of helping a small business owner to grow and become a part of the formalized economy. A few success stories:

- We supported Chef Tami Treadwell of Harlem Seafood Soul unlock a \$20,000 interest free grant through the Hebrew Free Loan Society to open a stall in Dekalb Market Place
- We helped Ana Maldonado of La Michoacana Taqueria Food Truck negotiate a fair rental price at a commissary to prepare her food, and then scouted with her to find a legal vending location in Washington Heights - find her on Broadway & 175th!

- We assisted Jovita Estrada of Rosa's Tamales to successfully renew her Mobile Food Vending License, which involved legal representation to waive tickets received

SVP truly fulfills a critical role. There is no city agency that meaningfully serves street vendors. In September 2023, Small Business Services reported to NYC Comptroller Brad Lander that they do not have staff dedicated to vending, does not conduct in-person educational outreach, and did not have data on how many street vendors had accessed any of their services.

This is a stark difference when compared with the investment in enforcement - DSNY as of the FY24 adopted budget currently has \$2.9 million budgeted for the office of street vendor enforcement, set to increase to \$4.7 million by FY27.

SVP is eager to increase services to street vendors, but we need City Council's support to increase our capacity. By empowering vendors to improve their financial literacy, our services help them integrate into the formalized economy - allowing them to open bank accounts, access credit, regularly pay and file taxes, and grow their businesses. Thank you for your consideration of this proposal in supporting the small business owners that make New York City beautiful and diverse.



NEW YORK CITY COUNCIL COMMITTEE ON SMALL BUSINESS Preliminary Budget Hearing

Thank you to the City Council, Chair Feliz and the Committee on Small Business for their attention to the 2025 fiscal budget cycle. I am speaking on behalf of Hot Bread Kitchen, an organization that promotes economic mobility for women and gender-expansive people, immigrants, and people of color through job training and placement, food entrepreneurship programs, and an ecosystem of support in New York City, using our city's vibrant food industry as a catalyst for career growth. We are also a proud member of the New York City Employment and Training Coalition (NYCETC); NYCETC serves as the 'industry voice' of more than 220 workforce development providers in NYC who are relied upon to connect New Yorkers of all ages – in every borough – to quality jobs and a living wage; and the services and support necessary to achieve self-sufficiency and economic mobility

Over the past 15 years, Hot Bread Kitchen has supported a community of over 1,500 program participants, who we call members, in launching careers in the food industry, starting and growing their small businesses, and accessing the resources they need to succeed at work and in the world. Our community, which includes residents of 50 City Council districts, consists primarily of women of color (93%); a majority are immigrants (51%). Roughly one third of our members this year are non-native English speakers, and 70% of our program participants this year were unemployed and below the poverty threshold before enrolling in our program. Our members are dedicated, hard-working New Yorkers seeking opportunities for meaningful careers, sustainable income, and long-term wealth generation for their families.

Hot Bread Kitchen offers our members a number of programs in order to reach economic mobility.

1. **Small Business Incubation:** We have helped incubate nearly 450 food businesses to date, mostly owned by women of color. Through our HBK Incubates program, we provide technical assistance, mentorship, access to markets, subsidized commercial kitchen space, and access to capital to food entrepreneurs of color.
2. **Quality Jobs Initiative:** In partnership with the Good Jobs Institute, we are working with a cohort of small restaurants to create practical frameworks to recruit and retain talent, promoting a systems change approach and better employment practices across the food industry.
3. **Workforce Training**
 - a. **Culinary Training:** our signature 100-hour training focuses on culinary fundamentals and professional readiness, then aids in direct job placement and layers on customized retention services.

- b. Upskilling: in 2023, we launched upskilling programs which enable food workers to gain additional skills leading to higher wages and career advancement.
4. Job Placement: We place all workforce training graduates into a high-quality job through our 250+ employer partners.
5. Human Services: As part of our support and retention program and our community-building efforts, we ensure that members have access to any assistance they need to start work confidently and safely- we offer wraparound support services in the form of MetroCards, support accessing childcare vouchers and affordable housing, referrals to health services, case management, etc.

We are grateful to have received Speaker funding from the City Council, which has supported our growing number of enrolled members and our expansion of offerings for our entrepreneurs. This funding has, among other things, helped us launch our HBK Incubates Seed Program last year, a modular program for aspiring food entrepreneurs. Through this program, we have guided businesses to develop their very own business plans.

We are seeking the Council's support again in FY25 to support our entrepreneur community. This year, we are launching two new programs for our entrepreneurs: HBK Incubates Start and Scale. Our Start program will focus on supporting entrepreneurs in their next phase of growth, those looking for subsidized licensed commercial kitchen space where they can produce their food product; entrepreneurs will also have access to tools and resources to test their business model. Our Scale Program will connect established entrepreneurs – who are women, immigrants and people of color who have been historically disinvested, to capital resources that allow them take their business to the next level. Our Capital Activation Program will help members deepen their financial capacity so they are prepared to apply, secure, and understand business loans that are tailored to their businesses' specific needs for growth.

As facilitators between entrepreneurs and City resources, organizations like ours need support from the City to keep testing and launching new programmatic offerings like Scale and Start for our small business communities. As an example, many of our small businesses are in need of greater access to capital and Community Development Financial Institutions. Hot Bread Kitchen has identified programmatic solutions like the Capital Activation Program within our Scale offering to help overcome these systemic issues of access. But we would benefit greatly from additional City Council funding to ensure we have the proper infrastructure in place to continue setting up and offering these kinds of solutions.

On behalf of Hot Bread Kitchen, I respectfully urge the Committee on Small Business to support our ambitious 2024 agenda and FY25 budget requests to reach more members than ever with our offerings. Thank you for your attention to this important issue and for your investment in Hot Bread Kitchen's work and community.

Eftihia Thomopoulos
Senior Manager of Strategic Initiatives



MELLO TYMES LLC
Bronx, New York 10467
Telephone ###-###-####

March 14, 2024

VIA ONLINE FORM

Honorable Chairman Oswald Feliz
Committee on Small Business
250 Broadway, Suite 1804
New York, NY 10007
Email: District15@council.nyc.gov

Re: Cannabis Loan Funding

Mr. Chairman Feliz and Members of the Committee,

My name is Eric Spencer and I am the Chief Compliance Officer (“CCO”) and Policy Analyst for Mello Tymes LLC (“Mello Tymes”), a Minority, Latina, and Returning Citizen owned Social Equity Brand that was awarded a New York State Conditional Adult Use Retail Dispensary License (“CAURD”) to open and operate a retail dispensary in the Bronx. I wanted to testify orally, but I was unable to. Please accept this written testimony in good faith and of legal certainty.

Upon inspection of the Preliminary Budget Report for the Office of Small Business Services and its Cannabis subsidiary, there has been a decrease in funding appropriated for NYC’s burgeoning Cannabis Industry (“Industry”). We believe that at a minimum, funding should be increased to help with the onboarding of Licensees hoping to operate in NYC.

One of the main reasons for the continued proliferation of the non-licensed cannabis market stems from the lack of open legalized and licensed dispensaries. If customers had viable choices, the non-licensed market would start to dissipate. As long as there are no alternatives, the non-licensed market will continue on with impunity.

The legalization of cannabis in New York State should afford cannabis licensees the same opportunities as other small business establishments. Oftentimes, funding is a key issue in the new Industry. However, unlike other industries operating in New York, funding is nearly nonexistent for cannabis entrepreneurs. We are at the mercy of predatory lenders who have not borne the brunt of the War on Drugs waged against communities of color in NYC. The Mayor’s Office did not allow Licensees to tap into the NY Small Business Opportunity Fund.

More importantly, there are many licensed New York Cannabis establishments operating in NYC currently and are paying a local tax alongside a state tax. I am certain that these monies could be appropriated back into the Industry for those men and women who are New York state licensed and trying to open their establishments.

While we applaud the Office of the Small Business Services of NYC, without loan funding to open and operate our cannabis establishments, the goal to eradicate the non-licensed market and address the disproportionately impacted communities that Councilman Eric Bottcher mentioned in the hearing will not be met. This is a great opportunity for New York City to become the standard bearer in the Industry as a whole.

In conclusion, Mello Tymes would request that funding be increased for the Cannabis NYC Loan Fund to \$30 million from \$8 million within the SBS to provide loans to NYC Cannabis Licensees who will be opening and operating in NYC.

Thank you,

Eric Spencer
CCO, and Policy Analyst
Mello Tymes LLC
###-###-####
eric@mellotymes.com

TAKEROOT JUSTICE

My name is Pilar DeJesus and I stand before you as a passionate advocate at TakeRoot Justice. TakeRoot Justice provides legal, participatory research, and policy support to strengthen the work of grassroots and community-based groups in New York City to dismantle racial, economic, and social oppression.

Today, I am here to request your continued support in funding for the Worker Cooperative Development Initiative, a critical program that not only fosters economic innovation but also uplifts communities that have historically been marginalized.

Worker cooperatives are more than just businesses. They are a testament to the power of collective ownership and democratic governance. In these trying times, when our communities are facing unprecedented economic challenges, worker cooperatives have emerged as beacons of hope, providing sustainable jobs, fair wages, and a dignified working environment for their members. They empower workers by giving them a voice in decision-making processes and a share in the wealth they help create.

The benefits of supporting worker cooperative development, especially in Black and Latino communities, are manifold. These communities often face systemic barriers to employment and economic advancement. Worker cooperatives not only offer an alternative pathway to entrepreneurship but also help in bridging the racial wealth gap. They keep wealth local, circulate dollars within our neighborhoods, and contribute to a more vibrant and equitable local economy.

As we stand on the cusp of a booming cannabis industry, the opportunity to integrate the cooperative model into this sector presents itself as a transformative strategy. The cannabis industry offers significant economic prospects, yet without a conscious effort to ensure equitable access, there exists a risk of perpetuating the same disparities we seek to overcome. Worker cooperatives in the cannabis sector can serve as a powerful antidote to these challenges.

By supporting the development of cannabis cooperatives, we can ensure that the benefits of this new industry are widely shared among our communities, particularly among Black and Latino populations that have been disproportionately affected by past cannabis prohibitions. These cooperatives can provide a pathway for meaningful participation in the industry, offering employment, ownership opportunities, and the chance to build generational wealth.

Furthermore, the impact of this initiative on our youth cannot be overstated. By investing in worker cooperatives, we are investing in the future of our young people. Cooperatives provide them with early exposure to business ownership, teamwork, and leadership. They learn the values of collaboration, financial literacy, and social responsibility. This education prepares them not just to be employees, but future entrepreneurs and community leaders.

By continuing and/or increasing the funding, we can provide these aspiring entrepreneurs with the support they need to overcome these barriers, ensuring that the Worker Cooperative Development Initiative is inclusive and accessible to all who wish to participate.

In conclusion, I urge the city council to view the continued funding and proposed increase for the Worker Cooperative Development Initiative not just as a budget line item, but as a vital investment in our communities' economic and social well-being. Let us seize this opportunity to build a more equitable, resilient, and prosperous city for all its residents.

Thank you for considering this request and for your ongoing commitment to the welfare of our communities.

Pilar DeJesus
Senior Advocacy Coordinator



**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 3/12/24

(PLEASE PRINT)

Name: Commissioner Kevin D. Kim

Address: 4 Liberty Plaza

I represent: Small Business Services

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: Dynisha Cross

Address: 4 Liberty Plaza

I represent: Small Business Services

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 3/12/2024

(PLEASE PRINT)

Name: Randy Peers

Address: _____

I represent: Brooklyn Chamber of Commerce

Address: 253 36th Street, BKLYN 11232

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: _____

(PLEASE PRINT)

Name: Meredith Phillips Almeida

Address: 7 DeKalb Ave BK NY 11201

I represent: NYC Small Business Resource Network

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 3/11/24

(PLEASE PRINT)

Name: Kayt Tiskras

Address: _____

I represent: Collective Public Affairs on behalf of WCBM + Pride at Work

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 3/12/24

(PLEASE PRINT)

Name: GREGORY J MORRIS

Address: _____ BRKLYN NY 11217

I represent: NEW YORK CITY EMPLOYMENT & TRAINING COALITION

Address: 121 Ave of Americas
NYC 10013

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

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THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 03/12/24

(PLEASE PRINT)

Name: Alice Salgado

Address: [Redacted] Brooklyn, NY, 11216

I represent: Mixteca

Address: 295 23rd Brooklyn, NY, 11215

**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: 03/12/24

(PLEASE PRINT)

Name: Elsa Samaniego

Address: 1005 24th Brooklyn, NY, 11219

I represent: Mixteca

Address: 295 23rd Brooklyn, NY, 11215

**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: CARINA KAVMAN-GUTIERREZ

Address: _____

I represent: Street Vendor Project

Address: 40 Rector Street 9th Floor NY NY 1006

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**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: 3/12/24

(ser-ring)

(PLEASE PRINT)

Name: Tshering Gung

Address: _____

I represent: Accompany Capital CDFI

Address: 11 Broadway, New York, NY 10004

**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: 3/12/24

(PLEASE PRINT)

Name: NICK AQUINO

Address: _____

I represent: VOLUNTEERS OF LEGAL SERVICE

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: Michael Forte

Address: 4 Liberty Plaza

I represent: Small Business Services

Address: _____

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