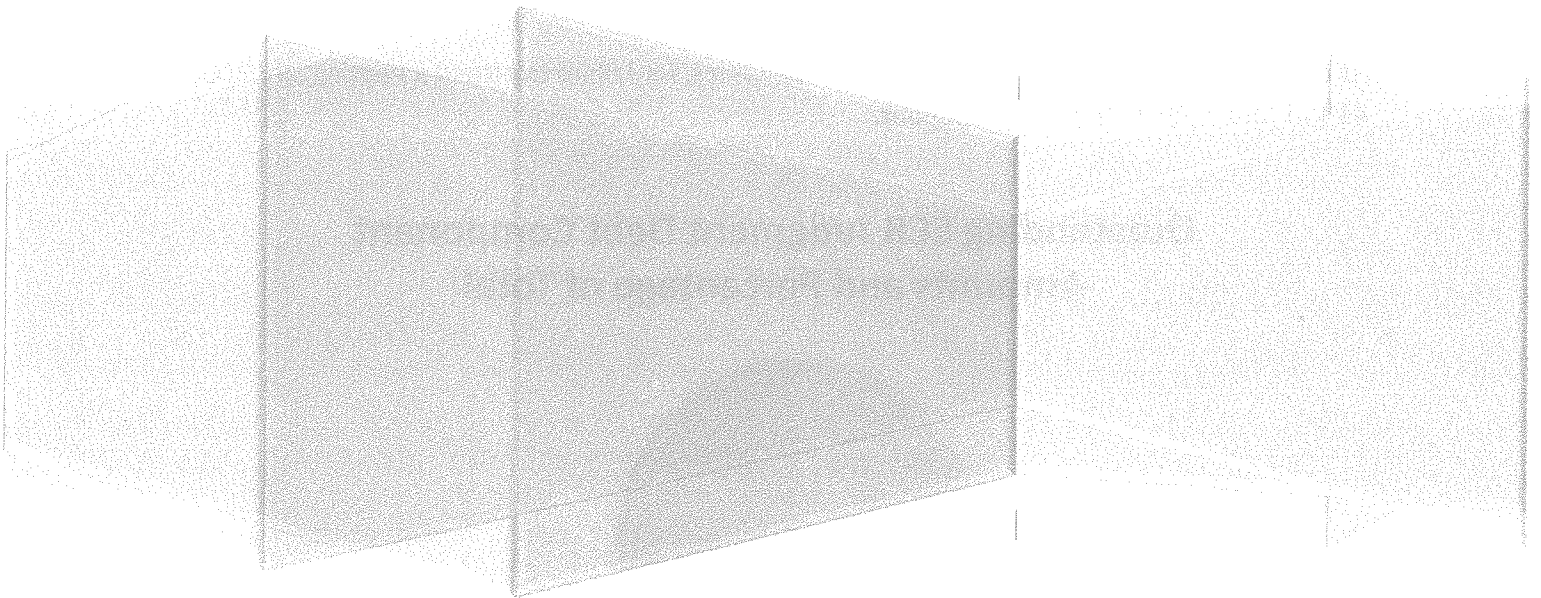


**FY2015 Annual Local Law 11 Report on
Environmental Control Board (ECB) – Adjudicated
Judgments Referred to NYC Department of
Finance (DOF)**

November 2015



Introduction:

On January 22, 2015, Mayor Bill de Blasio signed into law Intro 489-B. The bill, approved by the City Council at its Stated Meeting on January 7, 2015, requires the NYC Department of Finance (DOF) to report annually to the City Council on outstanding Environmental Control Board-adjudicated judgments.

DOF has to provide by November 1st of each year a publicly available report on outstanding judgment debt attributed to notices of violations issued by various City agencies and returnable to the Environmental Control Board and subsequently referred for collection during the previous fiscal year.

The data is as of October 5, 2015, and the source is the DOF Data Warehouse.

Part I: Department of Finance (DOF) Inventory of ECB Debt

The total outstanding inventory comprised of both the number of violations and dollar amount can be seen in the tables below.

Table 1: Total outstanding inventory and its components

# of Summonses	Base Fine	Penalty	Interest	Total Amount Due with Interest
1,456,919	\$ 482,938,620	\$ 709,354,109	\$ 386,520,180	\$ 1,578,812,909

As one can see from the graph below, default penalties, for failure to attend a hearing, are \$709MM, 45% of total and the largest component.

Outstanding ECB Judgment Debt Component Amounts and Percentage of Total

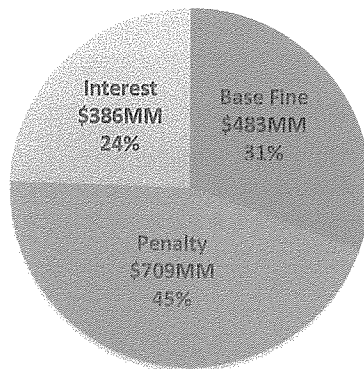


Table 2: DOF Inventory by Fiscal Year of Docket

Fiscal Year of Docket Date	# of Summonses	Base Fine \$	Penalty \$	Interest \$	Total Amount Due with Interest
FY16 to Date	64,127	24,768,104	35,201,060	640,424	\$60,609,589
FY15	193,027	71,825,145	104,884,220	11,228,934	187,938,299
FY14	146,358	57,135,636	77,236,569	20,849,720	155,221,924
FY13	164,017	65,947,185	91,538,614	38,970,839	196,456,638
FY12	161,997	70,734,387	105,180,023	59,509,286	235,423,696
FY11	206,645	69,153,031	107,597,335	75,124,370	251,874,735
FY10	217,536	59,251,338	88,241,158	75,330,673	222,823,170
FY09	180,007	39,206,704	59,156,784	59,848,170	158,211,658
FY08	123,205	24,917,090	40,318,347	45,017,764	110,253,200
Grand Total	1,456,919	482,938,620	709,354,109	386,520,180	1,578,812,909

Table 3: DOF Inventory by Issuing Agency

Issuing Agency	# of Summonses	Base Fine \$	Penalty \$	Interest \$	Total Amount Due with Interest
DOB	125,108	\$225,176,557	\$444,746,835	\$204,899,892	\$874,823,283
DSNY	1,134,088	\$123,491,641	\$156,456,675	\$102,837,239	\$382,785,555
FDNY	53,757	\$53,365,422	\$39,886,028	\$25,877,126	\$119,128,577
DOT	27,149	\$18,205,148	\$27,957,845	\$18,589,205	\$64,752,198
NYPD	48,984	\$31,492,960	\$9,071,097	\$13,788,280	\$54,352,338
DEP	11,573	\$11,774,869	\$20,406,979	\$10,606,320	\$42,788,168
DOHMH	26,410	\$14,636,159	\$2,801,639	\$4,692,206	\$22,130,005
Parks	26,425	\$3,583,334	\$6,336,812	\$4,103,268	\$14,023,414
BIC	868	\$396,022	\$860,577	\$559,187	\$1,815,786
Agency Missing	1,961	\$534,243	\$474,521	\$333,271	\$1,342,035
Landmarks	345	\$243,483	\$284,040	\$194,505	\$722,028
Seagate PD	203	\$22,717	\$43,795	\$21,483	\$87,995
Other Agency	48	\$16,065	\$27,265	\$18,197	\$61,527
Grand Total	1,456,919	\$482,938,620	\$709,354,109	\$386,520,180	\$1,578,812,909

*Other Agency comprises Animal Care & Control, DCA, DCAS, DoITT, HPD, Hunts Point Development, and Ports & Terminals, where total due was less than \$50K

Part II Fiscal Year 2015¹

Item I and II: Total Number of Judgments Referred to the Department of Finance by the Environmental Control Board. Total dollar amount of judgments referred to the department, disaggregated by base penalty, interest, and default penalty.

During FY15 DOF received about 218,000 judgment violations from ECB for a total of over \$200 million, including default penalties assessed against respondents for failing to appearing at a hearing.²

Table 4: FY15 Judgments Referred

# of Summonses Referred	\$ Base	\$ Penalty	\$ Interest	\$ Total Due with Interest
218,194	80,107,446.34	108,792,228.83	11,844,214.20	200,743,889.37

Violations docketed during FY2015 are displayed in Table 5.

Table 5: Referred by Issuing Agency

Issuing Agency	# of Summonses Referred	Base	Penalty	Interest	Total Amount Due
DOB	18,643	\$36,234,735	\$64,765,870	\$6,504,523	\$107,505,127
DSNY	160,639	\$16,974,933	\$21,458,956	\$2,533,800	\$40,967,690
FDNY	12,353	\$13,371,606	\$10,550,978	\$1,508,645	\$25,431,228
DOT	6,003	\$3,761,154	\$4,980,681	\$348,986	\$9,090,821
DEP	4,302	\$2,587,176	\$3,365,019	\$349,442	\$6,301,637
NYPD	7,135	\$3,518,026	\$2,379,672	\$278,051	\$6,175,748
DOHMH	6,226	\$3,187,847	\$522,401	\$236,563	\$3,946,811
Parks	2,487	\$378,606	\$622,404	\$69,692	\$1,070,701
Agency Missing	309	\$57,779	\$77,607	\$8,476	\$143,863
Landmarks	51	\$21,843	\$43,150	\$3,675	\$68,668
Other	46	\$13,741	\$25,492	\$2,361	\$41,594
Grand Total	218,148	\$80,093,706	\$108,766,737	\$11,841,853	\$200,743,889

¹ All the data displayed in the tables below is as of 10/5/2015

² Summonses referred to DOF with docket dates from 6/30/2014 through 5/31/2015 (last docket period for FY2015 is 5/31/2015) are considered as FY2015. We have excluded any write-offs or recalls.

Item III: Average Length of Time for Referral of a Judgment from the Environmental Control Board to the Department of Finance

The average elapsed time from docketing to DOF referral was 1.27 days ³

Item IV: Total dollar amount collected by the department for judgments

As of September 30, 2015, DOF collected more than \$17 million against violations that were referred to the agency during FY2015. This is reflected in Table 6. Hence, the collection rate for FY2015 referral is 8.8%.

Table 6: FY15 Revenue for violations docketed during FY15

Payment	# of Summons Paid	Length of Time Between Docket Date & Payment Date in Month Ranges					\$ Total Collected
		0-3M	4-6M	7-9M	10-12M	13-24M	
FY2015	32,885	\$10,535,950	\$3,789,766	\$1,948,732	\$997,274	\$406,130	\$17,677,852

Payments on ECB Judgments Referred to DOF in FY2015 - Disaggregated by Issuing Agency are listed in Table 7.

Table 7: Total Collected by DOF from 7/01/2014 until 9/3/2015

Issuing Agency	# of Summonses Paid	Total Amount Collected
DOB	4,457	\$6,396,853
FDNY	2,910	\$3,990,916
DSNY	18,869	\$3,043,906
DOT	1,911	\$1,571,598
NYPD	1,755	\$1,127,784
DEP	1,150	\$972,700
DOHMH	1,535	\$495,476
Other	298	\$78,620
Total	32,885	\$17,677,852

³ We took a sample of three months and looked at the average of the time that it takes for a violation to be received by DOF.

Item V: Length of Time for Collection of Judgments on Referred Violations during FY2015

Table 8

Issuing Agency	Length of Time Between Docket Date & Payment Date in Month Ranges					\$ Revenue Collected
	0-3M	4-6M	7-9M	10-12M	13-24M	
DOB	\$3,854,210	\$1,322,855	\$712,885	\$310,362	\$196,542	\$6,396,853
FDNY	\$2,436,208	\$937,014	\$340,923	\$207,131	\$69,641	\$3,990,916
DSNY	\$1,597,994	\$670,400	\$431,945	\$253,572	\$89,996	\$3,043,906
DOT	\$1,001,136	\$303,079	\$185,763	\$64,726		\$1,554,704
NYPD	\$683,604	\$241,494	\$130,484	\$60,563		\$1,116,145
DEP	\$658,723	\$168,643	\$77,922	\$58,787		\$964,075
DOHMH	\$253,568	\$125,654	\$66,063	\$38,504		\$483,789
Other Agency*	\$19,607	\$20,629	\$2,747	\$3,629	\$49,951	\$96,563
Parks	\$30,900					\$30,900
Grand Total	\$10,535,950	\$3,789,766	\$1,948,732	\$997,274	\$406,130	\$17,677,852

*Other Agency comprises those missing names, BIC, Landmarks, Seagate PD, and any of those displayed where revenue collected is less than \$25K.

Item VI: Total Number of FY2015 Judgments That Require Corrective Action by Respondent⁴

Table 9

Agency Name	# of Summonses	Base Fine	Penalties	Interest	Total Amount
DOB	18,631	\$36,203,772	\$64,697,907	\$6,498,476	\$107,400,155
FDNY	12,352	\$13,371,581	\$10,550,978	\$1,508,642	\$25,431,201
DEP	1,172	\$1,196,696	\$1,521,457	\$157,908	\$2,876,062
Landmarks	51	\$21,843	\$43,150	\$3,675	\$68,668
Total	32,206	\$50,793,892	\$76,813,492	\$8,168,701	\$135,776,085

⁴ Summonses referred to DOF and placed in location 020555 -docketed during FY2015 from static table of FY2015 Docketed Judgments; includes uncollectible states; includes satisfied summonses; excludes anything recalled.

Item VII: Enforcement Efforts Used by DOF to Collect Judgments in Item 4

Table 10: Numbers of letters sent out

Enforcement Letters Sent FY15:		
Name of Letter	Count of Letter	Total \$ Addressed
DOF Initial letter	78,536	\$280,768,764
DOF NG-Check Letter	237	\$899,499
DOF Partial Payment & Payment Plan Letter	2,928	\$62,668,307
OCA* Demand Letters	72,932	\$244,140,564
Total	154,633	\$588,477,134

* Outside Collection Agencies

Table 11: Number of Executions and Amount Collected by the Sheriff's Office and Marshalls

FY2015			
Sheriff		Marshals	
# of Executions Issued	Amount Collected	# of Executions Issued	Amount Collected
430	\$313,980	52	\$84,550

Item VIII: Total Number of Judgments Expired by Issuing Agency

Summonses have a life span of 8 years. Hence, summonses that are older than 8 years are considered expired and get to be excluded from the inventory. In Table 12, "FY07" and "Earlier than FY07" are considered expired, based on the above definition, and were excluded from the inventory.

FY08 through FY15 reflect summonses that were withdrawn and were excluded from the inventory as well.

Table 12: Total Number of Judgments Expired by FY

Fiscal Year of Docket Date	# of Summonses	\$ Amount Due
FY15	34	93,425
FY14	4	2,600
FY13	1	300
FY12	7	1,800
FY11	6	2,500
FY10	6	1,525
FY09	6	3,200
FY08	14	3,925
FY07	162,439	80,157,616
Earlier than FY07	11,845	4,889,944
Total	174,362	85,156,835

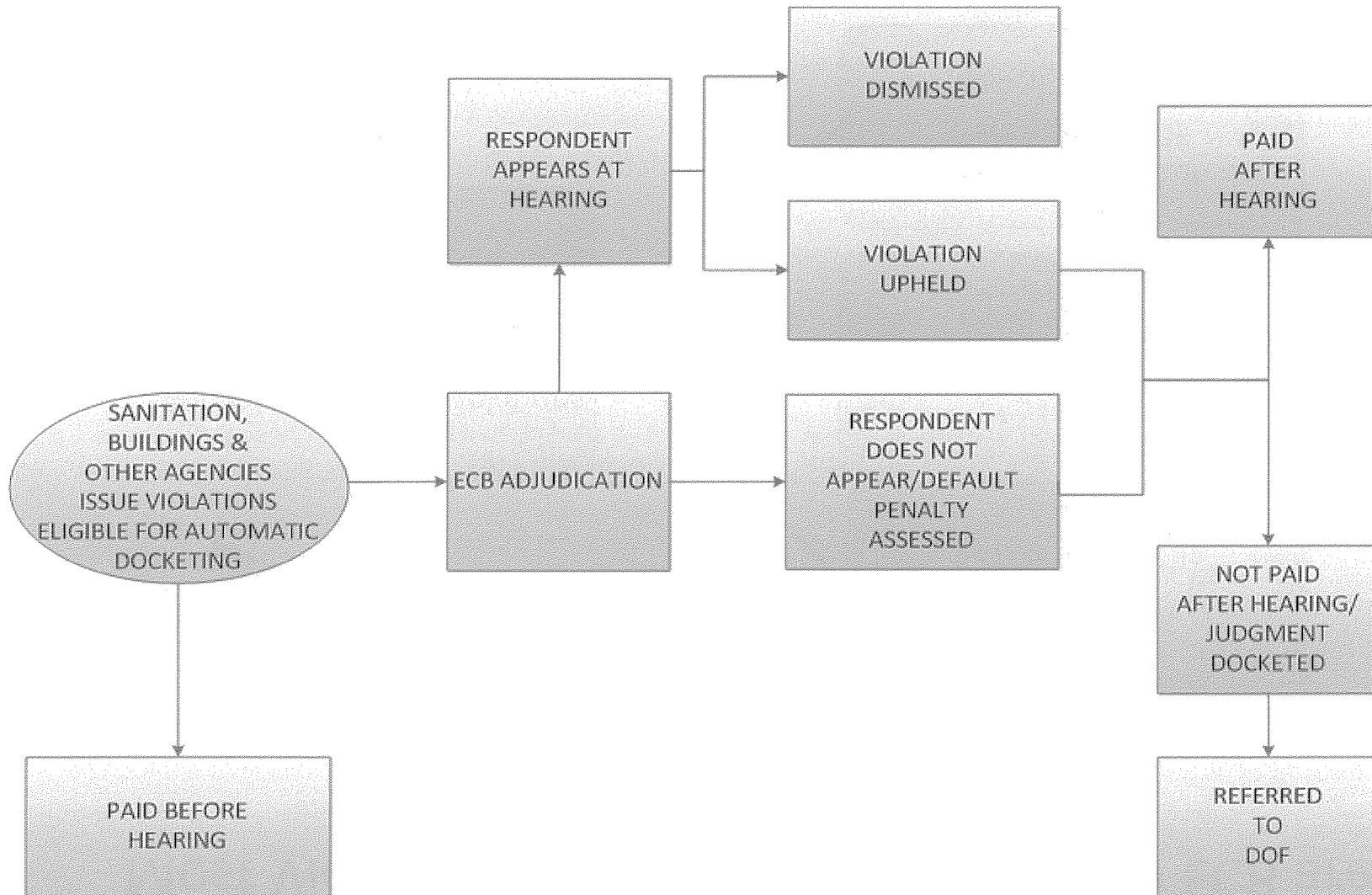
Table 13: Total Number of Judgments Expired by Issuing Agency

Agency Name	# of Summonses	\$ Amount Due
DSNY	150,138	\$40,078,789
DOB	7,756	\$21,907,091
DOT	5,214	\$9,167,868
FDNY	4,828	\$6,653,501
DEP	713	\$3,715,877
NYPD	1,616	\$1,722,881
Parks	3,627	\$1,533,146
BIC	97	\$131,034
Agency Missing	226	\$92,214
Landmarks	52	\$89,145
Hunts Point Development	60	\$54,185
Other	35	11,103
Total	174,362	85,156,835

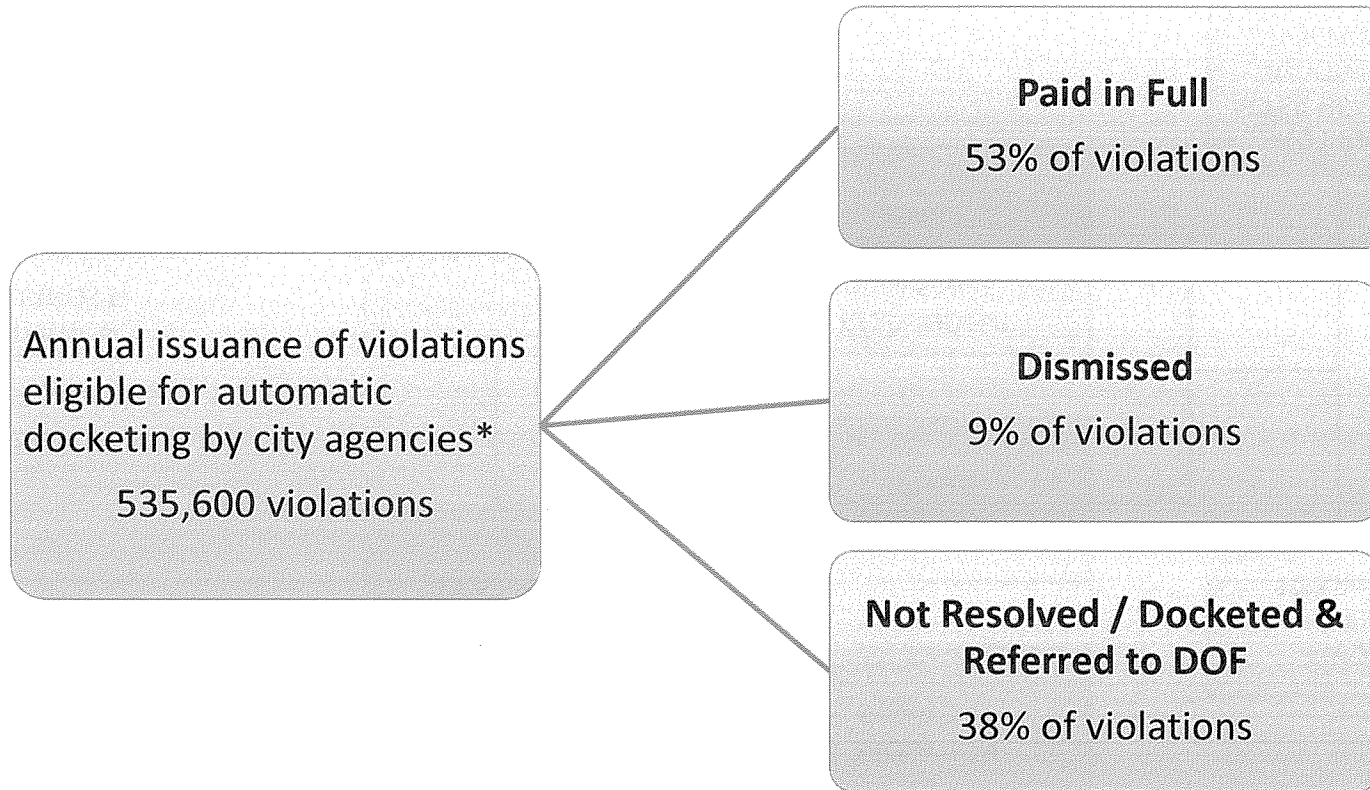
Local Law 11 of 2015 Report on DOF Collection of ECB-Adjudicated Judgments

Part I: Context

Process Overview



Most Violations that Can be Docketed by ECB are Resolved Prior to DOF Referral



Source: NYC OpenData for FY2014

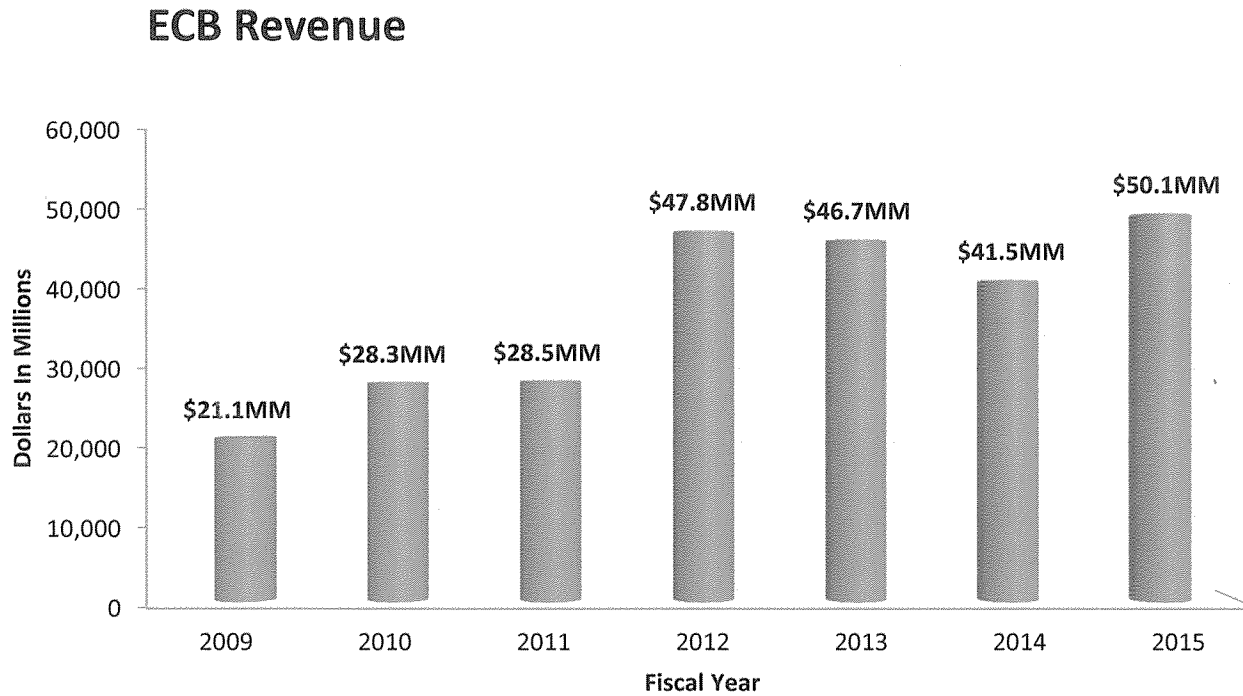
*Violations over \$25,000 and violations issued by the Department of Health and Mental Hygiene are excluded because they cannot be automatically docketed.

Assessment of Default Penalties and 8-Year Lifespan of Judgments Create a Large Inventory

Fiscal Year of Docket Date	# of Summonses	Base Fine \$	Penalty \$	Interest \$	Total Amount Outstanding \$
FY16 to Date	64,127	24,768,104	35,201,060	640,424	60,609,589
FY15	193,027	71,825,145	104,884,220	11,228,934	187,938,299
FY14	146,358	57,135,636	77,236,569	20,849,720	155,221,924
FY13	164,017	65,947,185	91,538,614	38,970,839	196,456,638
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FY10	217,536	59,251,338	88,241,158	75,330,673	222,823,170
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FY08	123,205	24,917,090	40,318,347	45,017,764	110,253,200
Grand Total	1,456,919	\$482,938,620	\$709,354,109	\$386,520,180	\$1,578,812,909

Source: NYC DOF Data Warehouse
Data as of 10/05/2015

DOF Collected \$50.1* Million in ECB Judgments in FY15 A Record



*Source: NYC Financial Management System (FMS)

Part II: Local Law No. 11 Report

Issued to Council on November 2, 2015

Available at: <http://www1.nyc.gov/site/finance/about/news-and-press.page>

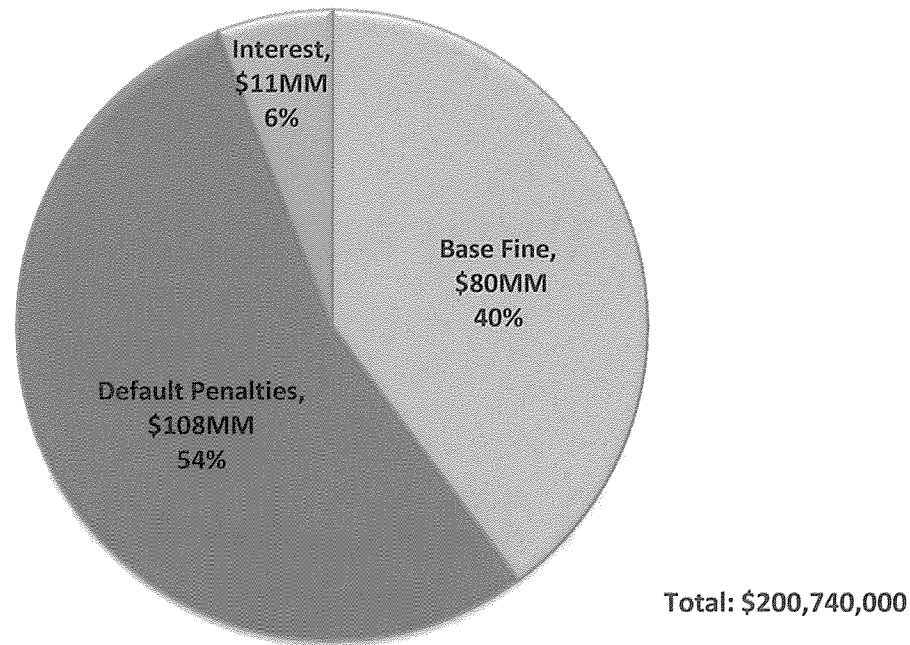
Inventory by Agency

Agency	Total Amount Outstanding (in MM)	% of Total	Total Penalty (in MM)	% of Total
Buildings (DOB)	\$875	55%	\$445	63%
Sanitation (DSNY)	\$383	24%	\$156	22%
Fire (FDNY)	\$119	8%	\$40	6%
Transportation (DOT)	\$65	4%	\$28	4%
Police (NYPD)	\$54	3%	\$9	1%
Environmental Protection (DEP)	\$43	3%	\$20	3%
Other Agencies	\$40	3%	\$11	2%
Grand Total	\$1,579	100%	\$709	100%

Source: NYC DOF Data Warehouse
Data as of 10/05/2015

FY15 Referrals to DOF

DOF received 218,000 judgment violations from ECB for a total of more than \$200 million, including penalties.



Source: NYC DOF Data Warehouse
Data as of 10/05/2015

FY15 Length of Time to Transfer Judgment Debt to DOF

The average elapsed time from docketing to DOF referral was 1.27 days*

*Source: NYC DOF (all violations docketed in April, May and June 2015. Does not include elapsed time from issuance of violation to docketing of unresolved violation)

Collection Rate Analysis

Collections Increase Over Time but Slow as Judgment Debt Ages

- 15-month collection rate on FY15 judgments is 8.8%. See Local Law 11 Report.
- 24-month collection rate on FY14 judgments is 11%.
- Eight-year collection rate is projected at 24% for newly referred judgments*.

*Projection done by extrapolation of FY15 collections disaggregated by age of paid judgments - See Appendix A

FY15 Collection Efforts

- Per Local Law 11, DOF and collection agencies sent out a total of 154,000 collection letters.

Other FY15 Initiatives:

- ❑ Increased use of Sheriff executions; 430 executions & \$315,000 collected
- ❑ New execution program with City Marshals; 52 Executions & \$85,000 collected
- ❑ Debt rotation among collection agencies produced at least \$4.4 million in revenue

Expired Judgments by Agency*

Agency Name	# of Violations	Amount
DSNY	150,138	\$ 40,078,789
DOB	7,756	\$ 21,907,091
DOT	5,214	\$ 9,167,868
FDNY	4,828	\$ 6,653,501
DEP	713	\$ 3,715,877
All Other	5,713	\$ 3,633,709
Total	174,362	\$ 85,156,835

*A docketed judgment is in force for eight years

Part III: Further Analysis

Collection Success Varies By Issuing Agency

Issuing Agency	Collection Rate on FY14 Judgments (as of 6/30/15)
DOT	30%
FDNY	18%
Other Agencies	15%
NYPD	14%
DSNY	9%
DOB	7%
Average 2–Year Collection Rate*	11%

*Weighted average by amount of debt per agency

Challenges to Further Increasing Collections

(Categories overlap and should not be added)

Challenges

Amount

- | | |
|---|-----------|
| • Older debt worked by two collection agencies and still outstanding | • \$900MM |
| • 75% of penalties uncollectable based upon historic DOF policy to offer settlements upon request | • \$530MM |
| • Inventory attributed to limited liability companies (LLCs)* - - FY15 enforcement referrals resulted in very low collection rate | • \$175MM |

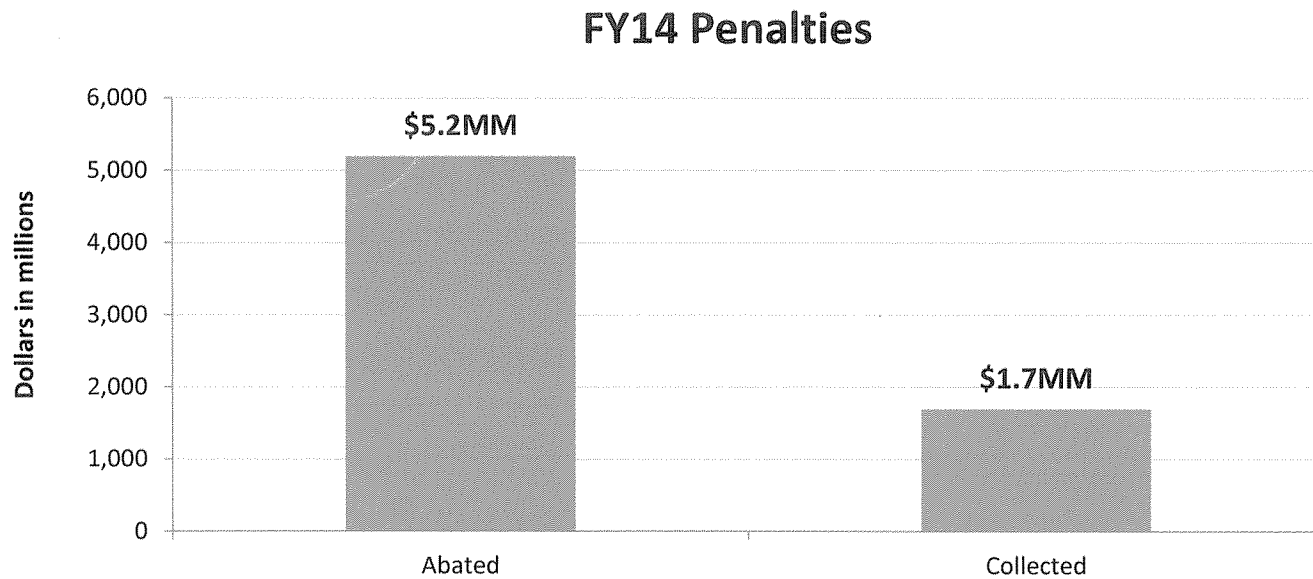
*Estimated (based on FY2014 incidence)

Debt Rotation

Nearly \$900MM of Open Inventory Has Been Worked by Two Different Collection Agencies

- In late 2014, DOF rotated \$500mm of the oldest ECB judgment debt between two outside collection agencies
- At the end of June 2015, DOF performed a second debt rotation of nearly \$400mm
- DOF is looking at the potential of writing off debt rotation assignments due to age of debt and the inability of two different agencies to collect outstanding debt

DOF Abates \$3 of Penalties for Every \$1 of Penalties Collected



Source: DOF data Warehouse. Review of all FY14 docketed violations paid during FY14

Other Issues Under Review

- Property change of ownership since issuance of violation to respondent (harder to find debtor)
- Respondent out of business, moved out of City, passed away
- Violation issued against respondent who is not a property owner (e.g., littering or failure of dog clean-up)

Next Steps

- New Amnesty Program
 - Improve communication and outreach
 - Incentivize participation - DOF proposes that post-amnesty settlements only abate 50% of penalties
 - Tougher post-amnesty enforcement

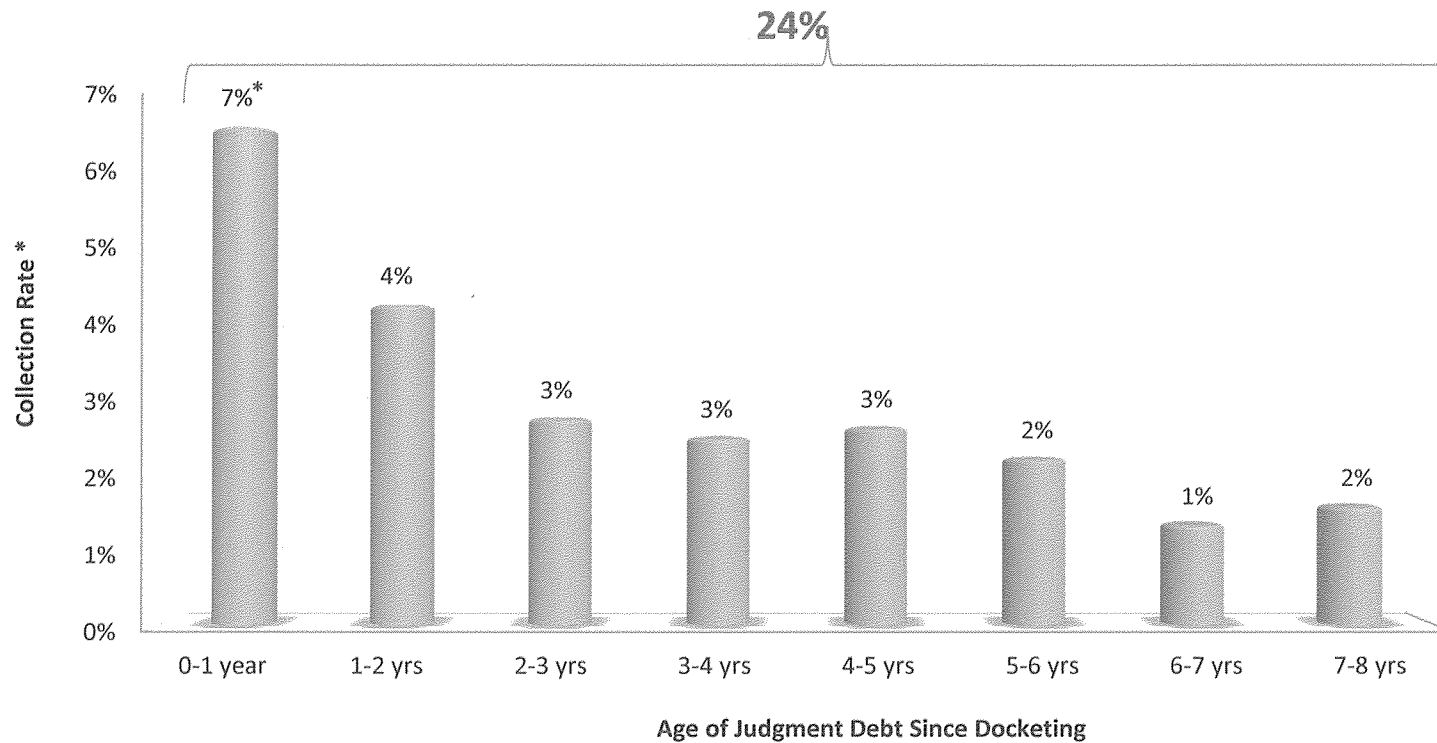
- Address High Penalty Amounts
 - ECB to cut DOB default penalties in half if respondent fixes underlying condition that generated infraction - to be implemented after amnesty

- Write-Offs
 - Accurately reflect collectible portion of inventory
 - Written off judgments remain in force until 8-year statute expires
 - Will start with the review of \$900 million of older debt worked by two different collection agencies

- Restructure DOF Internal Collection Efforts
 - Increase annual revenue
 - Accelerate collections so revenue comes in faster after DOF referral
 - Perform more debt segmentation analysis

Appendix A

Collection Rate By Age of Judgment Debt



Source: FY15 ECB Revenue by Age of Judgment Debt (\$50.1 million collected in FY15)

*Rate climbs to 8.8% after 15 months



DEBT RESULTING FROM ECB JUDGMENTS: --- AN OVERVIEW

June 2014

Executive Summary



- The Environmental Control Board (ECB) sends some of their outstanding debt to the Department of Finance for collection. The current amount of this debt is \$1.48 billion and represents 1.5 million in outstanding violations, of which 24%, or \$350 million, is interest.
- The judgments sent to Finance includes both compliance and non-compliance debt.
- 83%, or \$1.2 billion, of the debt is more than 24 months old. The older the debt, the more difficult it is to collect.
- There are a number of reasons why this debt is difficult to collect including age of violation, incorrect name or no name at all on summons, lack of unique identifier such as SSN, EIN, BIN or Borough Block and Lot, etc...

What is ECB?



- The Environmental Control Board (ECB) is a part of the Office of Administrative Trials and Hearings (OATH). It is an independent administrative court and is not part of the state court system. ECB judges hear cases on alleged violations of the City's laws that protect the City's quality of life. Violations that are filed at ECB can be issued by 13 different City enforcement agencies.

Types of Violations Sent to ECB

- These violations come from 13 different agencies and include, but are not limited to:
 - Dirty sidewalks
 - Littering
 - Failure to remove snow and ice
 - Posting of posters or signs where they are not permitted
 - Work without a permit from the Department of Buildings (DOB)
 - Failure to comply with DOB building code
 - Failure to file a Certificate of Correction with DOB
 - Failure to comply with a DOB order

Types of ECB Judgments

- There are two types of Violations Sent to ECB:
 - Compliance – the issuing agency requires a correction to be made to rectify the violation.
 - Non-compliance – the issuing agency does not require corrective action.

Agencies That Send Violations to ECB



- ❖ Business Integrity Commission
- ❖ Department of Buildings
- ❖ Department of Consumer Affairs
- ❖ Department of Environmental Protection
- ❖ Fire Department
- ❖ Department of Health & Mental Hygiene
- ❖ Department of Information Technology and Telecommunications
- ❖ Landmarks Preservation Commission
- ❖ Department of Parks & Recreation
- ❖ Police Department
- ❖ Department of Sanitation
- ❖ Department of Small Business Services
- ❖ Department of Transportation

ECB Debt by Agency



Agency Code	Agency Name	Compliance		Non-Compliance		TOTALS	
		Count	TOTAL	Count	TOTAL	Count	TOTAL
ASB	ASBESTOS CONTROL PROGRAM	1,610	\$ 14,746,455	0	\$0	1,610	\$14,746,455
BAR	AIR AND NOISE	2,788	\$ 4,818,759	0	\$0	2,788	\$4,818,759
DOB	DEPARTMENT OF BUILDINGS	122,897	\$ 769,644,779	0	\$0	122,897	\$769,644,779
FIR	FIRE DEPARTMENT	48,863	\$ 101,636,496	0	\$0	48,863	\$101,636,496
LPC	LANDMARKS PRESERVATION	351	\$ 792,249	0	\$0	351	\$792,249
055	NYPD INTELLIGENCE DIVISION	0	\$ -	5,160	\$14,031,409	5,160	\$14,031,409
056	POLICE DEPARTMENT	3	\$ 5,021	41,066	\$37,518,280	41,069	\$37,523,301
774	BUILDINGS DEPARTMENT	0	\$ -	1	\$134	1	\$134
775	POLICE DEPARTMENT	0	\$ -	7	\$7,698	7	\$7,698
802	HPD	0	\$ -	3	\$2,022	3	\$2,022
803	DEP HAZARDOUS MATERIALS	0	\$ -	1,143	\$6,872,858	1,143	\$6,872,858
804	DEP RIGHT TO KNOW	0	\$ -	129	\$1,440,916	129	\$1,440,916
810	DEPARTMENT OF BUILDINGS	0	\$ -	25	\$168,988	25	\$168,988
816	DOH/MENTAL HEALTH	0	\$ -	20,990	\$16,720,300	20,990	\$16,720,300
823	FIRE DEPARTMENT	0	\$ -	14	\$23,167	14	\$23,167
824	DEP IWC	0	\$ -	1,933	\$13,028,832	1,933	\$13,028,832
825	DEP BUREAU OF CUST. SERVICE	0	\$ -	55	\$32,765	55	\$32,765
826	DEP BUREAU OF ENV. COMPLIANC	0	\$ -	213	\$436,311	213	\$436,311
827	DOS ENFORCEMENT AGENTS	0	\$ -	688,819	\$223,295,851	688,819	\$223,295,851
828	SANITATION POLICE	0	\$ -	63,141	\$28,254,844	63,141	\$28,254,844
829	SANITATION OTHERS	0	\$ -	357,986	\$124,665,925	357,986	\$124,665,925
830	SANITATION PIU	0	\$ -	1,495	\$2,293,314	1,495	\$2,293,314
831	SANITATION RECYCLING	0	\$ -	81,201	\$32,060,018	81,201	\$32,060,018
832	SANITATION ENVIRON. POLICE	0	\$ -	505	\$1,084,617	505	\$1,084,617
841	DEPT OF TRANSPORTATION	0	\$ -	30,986	\$75,466,601	30,986	\$75,466,601
842	DCAS	0	\$ -	2	\$19,517	2	\$19,517
845	ENVIRONMENTAL PROTECTION (DEP)	0	\$ -	1	\$230	1	\$230
846	PARKS DEPARTMENT	0	\$ -	28,181	\$14,882,670	28,181	\$14,882,670
850	BIC	0	\$ -	960	\$1,895,384	960	\$1,895,384
858	DOITT	0	\$ -	3	\$1,280	3	\$1,280
866	DEPT OF CONSUMER AFFAIRS	0	\$ -	22	\$11,771	22	\$11,771
901	ANIMAL CARE AND CONTROL	0	\$ -	3	\$1,117	3	\$1,117
980	HUNTS POINT DEVELOPMENT	0	\$ -	86	\$119,186	86	\$119,186
985	SEAGATE POLICE	0	\$ -	176	\$76,910	176	\$76,910
989	DEPOLICE	0	\$ -	332	\$338,773	332	\$338,773
999	MISCELLANEOUS AGENCIES	0	\$ -	1,902	\$1,272,220	1,902	\$1,272,220
Total		176,512	\$ 891,643,759	1,326,540	\$596,023,908	1,503,052	\$1,487,667,667

Compliance Vs Non Compliance Debt



Compliance				
Age Range	Total # of Summonses	Interest Amount	Amount Due	TOTAL
0-3M				
4-6M	1,337	\$47,226	\$6,495,064	\$6,542,290
7-9M	4,757	\$508,708	\$23,856,139	\$24,364,847
10-12M	5,801	\$1,035,251	\$25,091,313	\$26,126,564
13-24M	20,935	\$10,450,072	\$107,735,744	\$118,185,816
25-36M	24,045	\$22,797,472	\$123,645,154	\$146,442,626
37-48M	25,162	\$35,205,952	\$132,292,907	\$167,498,859
49-84M	63,616	\$82,536,547	\$207,626,956	\$290,163,503
>7Yrs	30,859	\$42,424,127	\$69,895,125	\$112,319,252
Total	176,512	\$195,005,357	\$696,638,402	\$891,643,759

Non-Compliance				
Age Range	Total # of Summonses	Interest Amount	Amount Due	TOTAL
0-3M	3	\$789	\$1,100	\$1,889
4-6M	14,321	\$37,187	\$3,950,302	\$3,987,489
7-9M	36,905	\$272,698	\$11,845,877	\$12,118,575
10-12M	37,393	\$565,726	\$13,040,070	\$13,605,796
13-24M	121,693	\$4,326,704	\$43,727,320	\$48,054,024
25-36M	154,031	\$9,529,387	\$51,231,752	\$60,761,139
37-48M	167,161	\$16,203,732	\$57,621,709	\$73,825,441
49-84M	513,529	\$69,623,889	\$160,898,097	\$230,521,986
>7Yrs	281,504	\$59,641,563	\$93,506,006	\$153,147,569
Total	1,326,540	\$160,201,675	\$435,822,233	\$596,023,908

Total				
Age Range	Total # of Summonses	Interest Amount	Amount Due	TOTAL
0-3M	3	\$789	\$1,100	\$1,889
4-6M	15,658	\$84,414	\$10,445,366	\$10,529,780
7-9M	41,662	\$781,405	\$35,702,016	\$36,483,421
10-12M	43,194	\$1,600,977	\$38,131,383	\$39,732,360
13-24M	142,628	\$14,776,776	\$151,463,064	\$166,239,840
25-36M	178,076	\$32,326,859	\$174,876,906	\$207,203,765
37-48M	192,323	\$51,409,684	\$189,914,616	\$241,324,300
49-84M	577,145	\$152,160,437	\$368,525,053	\$520,685,490
>7Yrs	312,363	\$102,065,691	\$163,401,131	\$265,466,822
Total	1,503,052	\$355,207,032	\$1,132,460,635	\$1,487,667,667

Hearings for Violations Sent to ECB



- For both Compliance or Non- Compliance violations, ECB holds a hearing.
 - If the respondent attends the hearing and is found guilty:
 - The judgment amount is the base fine.
- Default means the respondent did not attend a hearing at ECB.
 - If respondent failed to appear for a hearing:
 - ECB imposes a default penalty.
 - Judgment amount is either the base fine or the default penalty.
- Docketed means the judgment has been docketed in the NYC Civil Court.
 - Interest begins to accrue on the judgment amount once a violation is docketed.

Type of ECB Deb Collected By DOF

- ECB sends only docketed judgments to Finance. It also sends un-docketed judgments to the Law Department for collection.
- There are two types of docketed judgments:
 - Default – the respondent did not appear for ECB hearing (default penalty).
 - In violation – respondent had ECB hearing and was found guilty (base penalty).
- 90% of the debt referred to Finance is due to a default judgment.

Current ECB Debt at DOF

- Outstanding Violations - 1.5 million
- Total Debt - \$1.48 billion
- Interest - \$350 million or 24%

ECB Debt: Difficult to Collect



- Many of the judgments referred to Finance for collection are in default because the debtor did not appear at a hearing.
 - It is possible the debtor did not appear because they did not receive notice even though a violation was served.
- Violations that are filed at ECB for hearings are difficult to collect because:
 - Enforcement agencies write summonses to names and addresses.
 - Businesses often go out of business and owners reincorporate in a new name to avoid judgments.
 - Violations are written to “owner of” making legal enforcement impossible.
 - Violations are written to incorrect name or to an entity that has no legal connection to the property.
 - Often violation is handwritten and data entered manually.
 - Human error – name misspellings or typos
 - There is no unique identifier for the violations such as:
 - ❖ EIN or SSN for the respondent
 - ❖ Borough, Block, and Lot (BBL) for the property
 - ❖ BIN for the property

ECB Debt: Difficult to Collect



- The older the debt, the more difficult it is to collect.
- Currently there is outstanding ECB debt that is older than 7 years .
- \$1.23 billion out of \$1.48 billion, or approximately 83%, is older than 24 months.

Aged Debt > 24 Months Total				
Age Range	Total # of Summonses	Interest Amount	Amount Due	TOTAL
25-36M	178,076	\$ 32,326,859	\$ 174,876,906	\$ 207,203,765
37-48M	192,323	\$ 51,409,684	\$ 189,914,616	\$ 241,324,300
49-84M	577,145	\$ 152,160,437	\$ 368,525,053	\$ 520,685,490
>7Yrs	312,363	\$ 102,065,691	\$ 163,401,131	\$ 265,466,822
Total	1,259,907	\$ 337,962,671	\$ 896,717,706	\$ 1,234,680,377

ECB Debt Collection Efforts



- Starting in July 2012, DOF contracted with 3 Outside Collection Agencies (OCAs) to assist with ECB debt collection.
- With more advanced debt collection tools, OCAs are experts at collecting debt.

ECB Collections by OCA

Fiscal Year	ECB Collected by OCA	All Other Collections	Total ECB \$ Collected
2011	\$164,848	\$19,515,218	\$19,680,066
2012	\$7,237,832	\$21,684,001	\$28,921,833
2013	\$20,082,386	\$6,660,463	\$26,742,849
2014*	\$23,762,115	\$182,710	\$23,944,825
Grand Total	\$51,247,181	\$48,042,392	\$99,289,573

OCA ECB Revenue Summary				Assignments
Fiscal Year	Revenue	Commission	Netback	
2011	\$164,848	\$12,858	\$151,989	\$87,000,000
2012	\$7,237,832	\$1,317,299	\$5,920,533	\$848,316,261
2013	\$20,082,386	\$2,670,948	\$17,411,439	\$468,401,971
2014*	\$23,762,115	\$2,823,437	\$20,938,678	\$97,995,669
Total	\$51,247,181	\$6,824,543	\$44,422,638	\$1,501,713,901

*FY'14 data through May 2014

ECB Debt Collection by Type

Fiscal Year	2011	2012	2013	2014	Total
Sanitation/Non-Compliance	\$8,879,917	\$12,667,941	\$9,704,915	\$8,702,129	\$39,954,902
Air & Noise	\$0	\$103,400	\$206,907	\$222,016	\$532,323
Asbestos	\$246,200	\$360,115	\$683,012	\$260,160	\$1,549,487
Buildings	\$8,870,473	\$12,670,105	\$12,303,837	\$10,615,744	\$44,460,159
Fire	\$1,666,452	\$3,084,278	\$3,814,565	\$4,118,176	\$12,683,471
Landmarks	\$17,024	\$35,994	\$29,613	\$26,600	\$109,231
Grand Total	\$19,680,066	\$28,921,833	\$26,742,849	\$23,944,825	\$99,289,573

Improving ECB Debt Collection



- While Finance has contracted with OCAs to assist in the resolution of ECB debt, we need to address the factors that make it so difficult to collect. These include how violations are issued, and developing a more uniform approach across City agencies. In order to address these challenges, we make the following recommendations.

Recommendations



- We recommend creating an inter-agency working group with all of the agencies that issue ECB violations to determine best practices and ensure that violations are enforceable and that fines are collectible.

The group will consider the following issues:

- Whether all violations could be written to an entity that has a unique identifier.
- The possibility of allowing issuing agencies to be able to suspend or rescind permits and licenses for entities with unresolved judgments.
- Adding enforcement tools for violations sent to ECB that are in judgment.
- Giving Finance more latitude to offer settlements for judgments when appropriate (for example when the respondent goes out of business or can prove the violation was written in error.)
- Examining the current write-off policy for debt and benchmarking best practices for debt write-off.



Statement by Fidel Del Valle, Commissioner & Chief Administrative Law Judge at the NYC Office of Administrative Trials and Hearings, to the City Council in Connection with the Department of Finance's Annual Report on Outstanding New York City Debt resulting from Adjudications at OATH

November 19, 2015

This statement is being submitted to Chairpersons Kallos and Ferreras-Copeland and the members of their respective committees in relation to Int. 811 & Int. 812.

OATH's Commitment to Transparency & Equity

The New York City Office of Administrative Trials and Hearings ("OATH") is one of the largest independent administrative law courts in the United States. OATH's Hearing Division adjudicates a wide variety of summonses. In calendar year 2014, this division held over 300,000 hearings. The OATH Trials Division was previously referred to as OATH Tribunal and adjudicates the more complex administrative law matters that include city contract cases, human rights violations, employee disciplinary cases, and loft board cases. As an independent administrative law court, OATH's primary mission is to provide impartial, fair and timely trials and hearings to everyone who appears before our administrative law judges and hearing officers. OATH keeps

both the public and the enforcement agencies informed of its commitment. OATH regularly provides to issuing agencies statistical data concerning dispositions on summonses returnable to the OATH Hearings Division including dismissal rates. To inform the public, OATH posts quarterly reports containing this data on its website. Pursuant to Local Law No. 64, OATH now provides the Council, Public Advocate, and Enforcement Agencies with a monthly dismissal report concerning For Hire & Taxi Hearings, Health & Restaurant Hearings, and ECB Hearings. OATH's dismissal report provides the numbers of and reasons for dismissals. The reasons for these dismissals might include, but are not limited to improper service, defective summons, and dismissals on the merits.

In reference to Int. 811:

OATH is committed to its mission to act as an impartial forum where equity and fairness are the goals. The proposed legislation requiring agencies to amend summonses if they are aware of deficiencies therein will make the process more difficult since it places limitations and adds time constraints. Currently, if the enforcement agency contacts OATH, OATH will correct errors prior to the hearing date, subject to due process requirements. The summons may also be amended on motion at a hearing if there is no negative impact on the respondent's due process

rights, for instance, where the summons reversed the first and last names of the respondent, but the respondent appeared.

In reference to Int. 812:

The proposed legislation requiring enforcement agencies to include unique identifiers including the block, lot, and property registration number does not have any impact on OATH. However, there exist property lots that include multiple properties, making it exceedingly difficult if not impossible to identify the property by block and lot. For example, some communities have several lots that contain large numbers of residential properties. In addition, it should be made clear that the property identifier is only necessary where the alleged violation actually involves the property and not where the address is listed only for the purpose of identifying where the violation took place, for example, a pooper scooper violation.

Conclusion

Thank you for providing me the opportunity to testify and for your ongoing support of OATH. I would be happy to answer any questions you may have.

FOR THE RECORD



MARSHAL'S ASSOCIATION

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New York City Council

Finance Committee & Governmental Operations Committee

Oversight Hearing: The Department of Finance's Annual Report on Outstanding Environmental Control Board Judgments

November 19, 2015

ALFRED E. LOCASCIO
President

MARTIN A. BIENSTOCK
Vice President

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Secretary

STEVEN POWELL
Sgt. at Arms

RUTH BURKO
Ex-Officio

KENNETH D. LITWACK
General Counsel

WILSON, ELSEY,
MOSKOWITZ,
EDELMAAN & DICKER

On behalf of the Marshals Association of the City of New York, thank you for the opportunity to submit testimony at today's oversight hearing on the Department of Finance's Annual Report on Outstanding Environmental Control Board Judgments. The Marshals Association represents all City Marshals that are appointed by the Mayor (recommendations made by the Mayor's Committee on City Marshals) and overseen by the Department of Investigation.

City Marshals are permitted to collect outstanding Environmental Control Board debt on behalf of the Department of Finance if assigned work by the Department. Except for the statutory fee that a Marshal will earn for his or her work in collecting on a judgment, all debt (i.e. base fine, penalties and interest) is returned to the Department of Finance. When a Marshal is assigned a judgment to collect, all expenses associated with collecting the debt is assumed by the individual Marshal even if that debt is deemed to be uncollectable.

The Marshals Association thanks Council Members Julissa Ferreras-Copeland, Chair of the Finance Committee and Ben Kallos, Chair of the Government Operations Committee for highlighting the topic of outstanding debt and the measures the City is taking to address the issue. We would also like to thank Chair Ferreras-Copeland for her leadership in enacting Local Law 11 (2015) that now permits Marshals to collect judgments arising out of the Department of Sanitation, which according to the Annual Report, is the agency with the greatest number of summonses issued.

The Marshals have had a relationship with the Department of Finance with the booting of vehicles (formally the towing of vehicles) due to unpaid parking fines. The booting program results in approximately \$50 million returned to the City annually. Due to the City Council's heightened attention to the outstanding debt issue and the implementation of Local Law 11 the Marshals proactively worked with the Department of Finance to establish a program for Marshals to collect outstanding ECB debt. Deputy Commissioner

Jeffrey Shear and his staff have been instrumental in working with the Marshals Association over the past few months to establish the collections program. We compliment the Department of Finance in answering questions and addressing the concerns of Marshals as the program continues to develop.

Although there is a vast amount of outstanding debt, a significant amount of the existing debt is uncollectable for various reasons. For example, a construction company that was fined for various Department of Buildings violations may now be dissolved or a residential building that was fined by the Department of Sanitation may have changed owners numerous times over the years. The Marshals have every incentive to find and collect debt from those who don't pay, but many times it is impossible to find a responsible individual or entity from which to collect the outstanding funds. Since Marshals have started to work with the Department of Finance there have been mixed results in the field in regards to debt being actually collectable.

We compliment the Department of Finance for putting together a program involving the City Marshals in order to collect this debt. We understand the daunting task of both the Council and the Department of really understanding what debt is outstanding and how to effectively collect it from those who declined to pay. The Marshals expect to continue to increase work with the Department of Finance as the program develops over the next few months. We will continue to keep both the Department and the City Council informed of our experiences in collecting this debt.

The Marshals Association thanks the City Council for the opportunity to submit this testimony today. We are all happy to work with the City Council and the Department of Finance on this important issue. If there are any questions or need for follow-up information please do not hesitate to contact the Marshals Association.

Alfred Locascio, President

Martin Bienstock, Vice President

New York City Department of Finance

Testimony to the City Council

on Legislation Related to Violations

Adjudicated by the Environmental Control Board

Good afternoon Chairwoman Ferreras-Copeland and Chairman Kallos, and members of the Committee on Finance and Governmental Operations. I am Jeffrey Shear, Deputy Commissioner for Treasury, Payments and Operations for the Department of Finance (DOF). Thank you again for the opportunity to present our report on the collection of debt resulting from violations adjudicated by the Environmental Control Board (ECB), which is part of the Office of Administrative Trials and Hearings (OATH).

These summonses are issued by many City agencies for safety and environmental violations, such as building code and sanitation infractions. The primary purpose of the violations is to change behavior so that we may all live in a safer, cleaner city. Collecting past due debt on these violations provides incentives for this behavior and has the additional benefit of generating revenue for essential City services. As you know, DOF testified on this topic last year. At that time, we indicated that while this debt is more challenging to collect than other types of City-issued debt, there was much more that we could do to better understand and collect it. We agreed with the Council that DOF could better analyze the debt, take more enforcement action, and generate more revenue. This year, I am here to say that we have made good progress.

We supported Council-sponsored legislation to improve the quality and transparency of information on ECB-adjudicated debt. This legislation became Local Law 11, which requires us to submit a report to the Council and the public each November that focuses on the overall inventory of debt as well as information pertaining to judgments DOF received in the previous fiscal year. We presented the first report on November 2nd and will review it today. We also supported the provisions of Local Law 11 that authorized Department of Sanitation-issued judgments to be referred to City Marshals. The law has contributed to a significant increase in referrals to both the City Sheriff and City Marshals. Referrals to enforcement agents went from single digits during the past several years to nearly 500 during fiscal year 2015. This and other initiatives have contributed to an improvement in debt collection in the 2015 fiscal year to a record \$50.1 million, a 21-percent increase over the \$41.5 million collected in fiscal year 2014.

I will start my testimony today with a presentation relating to our Local Law 11 report. It begins with some background information, highlights the findings of the Local Law 11 report, includes

some additional analysis, and concludes with next steps. After the presentation, I will turn to the legislation before the committee today — Introduction Numbers 806-A, 807, and 810. OATH will address Introduction Numbers 811 and 812.

Int. No. 806-A

As indicated during our presentation, the Department supports this legislation, on which we have worked closely with the Council Finance chair and staff. It will establish an amnesty program to provide incentives to citizens with ECB-adjudicated debt to come forth and pay their open judgments. The bill does the following:

- Authorizes the Commissioner of Finance to establish a 90-day amnesty program during fiscal year 16 for ECB-adjudicated judgments.
- Waives interest charges on all judgments resolved under the amnesty program. Furthermore, for judgments that had a hearing at the ECB, respondents will also receive a 25% reduction off the base fine. Judgments in default (that did not have a hearing) will still owe 100% of the base fine but will have default penalties waived.
- Requires amnesty participants with violations requiring a corrective action to fix the underlying condition within six months.
- Excludes from the amnesty program judgments that already included in settlement agreements with DOF or the Law Department. A respondent with a criminal investigation related to his or her judgment will also be excluded.
- Waives at most half the default penalty on violations eligible for amnesty if respondents choose to enter into a settlement agreement with DOF after the amnesty program. (Settlement agreements for judgments issued after amnesty will allow for all penalties to be waived).
- Requires the Commissioner of Finance to publicize the amnesty program to maximize public awareness and participation.

Beyond what is mandated in the amnesty legislation, the Department of Finance will also administratively obtain Employer Identification Number information for City vendors and match that against the vendors' ECB judgments to stop vendor payments to respondents with judgment debt. We plan to put this in motion and believe we can complete this by the time the amnesty period ends. We believe the amnesty program, combined with these new enforcement efforts, will improve how quickly we obtain money owed to the City so that the funds can be used for essential programs and services.

Int. 807 (Ferrerias-Copeland)

Agencies that issue violations returnable to the Environmental Control Board sometimes issue those notices to a generic "owner of" a specified entity or address when the issuing agency is unable to identify the name of the entity or property owner. This bill clarifies that ECB should

treat a generic notice in the same manner as if the notice had cited the owner of the specified entity or premises by name. This bill also requires an agency that issues a generic notice to make best efforts to learn the respondent's true name after issuing the notice. Finally, the bill provides that when a default decision is rendered on a generic notice and the judgment is given to the Department of Finance for collection, the Commissioner of Finance must make best efforts to learn the respondent's true name.

The Department generally supports this legislation, although it largely impacts agencies which issue violations and may have additional operational concerns. While the number of these violations is not insignificant, with 3,284 judgment violations totaling \$8 million in our inventory issued to "Owner of" properties, it is very small relative to the overall inventory of 1.4 million violations totaling nearly \$1.6 billion. We do not support the provision requiring DOF to mail a copy of the default decision in these cases. This is already done by ECB, and we issue our own collection letters.

Int. 810 (Kallos)

This bill allows a city agency that issues violations returnable to ECB to suspend or revoke licenses and permits issued by that agency, or deny applicants for such licenses or permits, where the licensee, permittee or applicant has failed to pay penalties previously imposed by ECB. Suspension, revocation or denial may take place in three situations: where the permittee, licensee or applicant has \$50,000 in unpaid ECB debt after two years or \$25,000 in unpaid ECB debt after four years; or where the licensee, permittee or applicant had \$10,000 in unpaid ECB debt, was party to a payment plan and has missed three or more consecutive payments. This bill authorizes agencies to suspend licenses and permits of entities with ECB judgments. It is an option rather than a mandate.

DOF supports the concept that agencies should suspend, revoke, and deny licenses and permits for certain reasons. However for some agencies, particularly those that ensure safety conditions, suspending or revoking a permit or license **could** complicate the regulatory process, and it is important to ensure that their views are taken into account as we continue conversations about this legislation. One example where an agency has been successful in striking the right balance is the Department of Transportation. It has a successful permit suspension program. However, the bill as currently envisioned may potentially result in fewer actions against licenses and permits because of the high-dollar and lengthy time triggers in section eight. These need to be reworked with issuing agencies and DOF or left to DOF rulemaking. Another option the Council may wish to consider is requiring licensing and permitting agencies to report to the Council on the extent to which they are currently checking licensees, permittees or applicants to determine if they have outstanding judgments.

Thank you for the opportunity to testify today. The Department appreciates the attention the Council has brought to this issue and our ongoing work to improve our collection efforts. I welcome any questions you may have.

Testimony of Robert Bookman, Esq.
before Joint Hearing of the Committees on Finance and Governmental
Operations, November 19, 2015
Partner, Pesetsky and Bookman
Counsel, NYC Hospitality Alliance
Counsel, NYC Newsstand Operators Association

I am VERY concerned about the negative impact these package of bills may have on the small business community and am very surprised that this Council is pursuing these bills as it moves in the opposite direction than you have been in trying to help small businesses. To me, these bills just seem like an avenue to collect more fines from small businesses.

One of the long standing and persistent problems with administrative summonses is inadequate legal service of them resulting in thousands of defaults. Violations are left on doors, handed to anyone present at the time in a store, not made out to a person in charge or to a business's legal name.. so of course they result in defaults.

But not only do these bills not address this problem in any meaningful way, they make it easier to collect fines on defaults. Even when the Intros requires more identifying information, it then goes on to say it is not a defense if that information is not there or uses vague language like "where possible" "best efforts" ...loop holes for the issuing agencies wide enough to drive a truck through.

There needs to be meaningful default reform and we would be happy to work with you on that.

But the Intro that concerns me the most is 810, as that goes a step farther than ever before by allowing agencies that regulate small businesses to put someone out of business by suspending or revoking their required

operating licenses, or prevent a new business from opening all because there allegedly are unpaid fines. The language of this bill is scary for what it does say and what it does not say. For example:

The fines come from a business that is closed for years. I was part owner of that failed business. I want to open a new business in another location. Are those fines mine personally even though I was never personally cited or served?

The fines resulted from a default I knew nothing about? It says I am entitled to a hearing, but about what? The default or the underlying charges??

I can go on with troubling examples and the implications for how this may violate NYS Business Corporation Laws which shield individuals owners from personal liability of their corporation. And I can just imagine the complaints Council members will receive when the neighborhood pizza place or fruit and vegetable store are closed due to default fines from years ago. And let us not forget, many of these fines come from an era where you all agreed the City had gone overboard issuing nitpicky violations. So now you are going to make it easier for the City to close these businesses for not paying these fines?

Of course, the City is entitled to collect on legitimate fines that resulted from a hearing where both sides were present, where service meets due process standards we would all want if we were the respondent and with businesses that remain open and operating. But these bills go way beyond that. Let's work together to fix them and at the same time provide meaningful relief to our thousands of small businesses that form the backbone of our neighborhoods and who for too long were seen as ATM machines by City government.

**Testimony before the Committee on Governmental Operations
of the New York City Council
By Ryan J. S. Baxter, Assistant Vice President
Real Estate Board of New York
November 19, 2015**

Good afternoon Chairperson Kallos and members of the committee on Governmental Operations. The Real Estate Board of New York, representing over 17,000 owners, developers, managers, and brokers of real property in New York City, thanks you for the opportunity to testify on the proposal relating to the environmental control board's notices of violation citing owners of specific entities or premises by name.

REBNY and its members support the goals of Introduction 807, and have always been advocates for achieving the greatest level of transparency possible with regard to civil penalties, violations, and those who should be held responsible for paying them. We believe that this bill can play an important role in that process, and greatly diminish the confusion that can – and sometimes does – ensue when a generic notice does not accurately name the respondent in question.

For this legislation to be as effective as possible, REBNY recommends that it be amended to also apply to occupants of premises in addition to owners of those entities. As currently written, this bill does not adequately state that liable parties will be held responsible for their violations, but implies that the control board will simply name owners on resulting notices, regardless of their level of involvement in the violation, if any.

As stated in our testimony regarding Introductions 823 and 826 - greater transparency in enforcement against illegal conversions of dwelling units and civil penalties for illegal conversions of dwelling units, respectively – our priority is that bills of this nature be constructed to ensure that the entities responsible for actually committing these violations be held responsible for paying the ensuing penalties, and we view Intro. 807 as an encouraging step in that direction. As it currently stands, if a tenant illegally converts his or her apartment through a service such as Airbnb, Intro. 807 would simply require the name of the owner be placed on the notice, while the tenant would still not legally be required to shoulder any of the penalties.

With modifications to address the aforementioned concerns, REBNY would support Int. No. 807. Thank you again for the opportunity to comment, and we look forward to continuing our conversations with the Council to continue improving these introduction.

**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: Jeff Shear

Address: _____

I represent: NYC DOF

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 910, 078 Res. No. _____

in favor in opposition

Date: 11/15/15

(PLEASE PRINT)

Name: Robert Bookman

Address: 325 Broadway, NYC

I represent: NYC Hospitality Alliance

Address: same

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 811 Res. No. 812

in favor in opposition

Date: 11/19/15

(PLEASE PRINT)

Name: Commissioner Fidel Del Valle

Address: 100 Church Street NY NY 10007

I represent: OATH

Address: _____

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