

**NEW YORK CITY COUNCIL
COMMITTEE ON OVERSIGHT AND INVESTIGATIONS
JOINTLY WITH THE COMMITTEE ON CONTRACTS AND THE
COMMITTEE ON TECHNOLOGY**

**TESTIMONY OF MARK G. PETERS
COMMISSIONER, NEW YORK CITY DEPARTMENT OF INVESTIGATION**

**CONCERNING EXAMINING LESSONS LEARNED AND
RECOMMENDATIONS FOR IMPROVING NEW YORK CITY'S
MANAGEMENT OF LARGE INFORMATION TECHNOLOGY
CONTRACTS**

December 15, 2014

Good afternoon Chair Gentile and members of the Committee on Oversight and Investigations, Chair Rosenthal and members of the Committee on Contracts, and Chair Vacca and members of the Committee on Technology. I am Mark Peters, Commissioner of the New York City Department of Investigation. I am pleased to present testimony today on the lessons learned from prior investigations of New York City's large-scale information technology contracts.

This is an important issue for DOI in the wake of our extensive investigation into CityTime, that led last year to criminal convictions and a large monetary recovery for the City. As you will recall, the CityTime project was an Information Technology initiative designed to provide an automated system of timekeeping and payroll for municipal employees. While the original budget was set at \$63 million, the costs ultimately ballooned to approximately \$700 million.

DOI's investigation into CityTime uncovered a massive fraud, kickback and money laundering scheme involving New York City funds allocated for the project. Additionally, beyond the outright criminality, our investigation exposed a number of vulnerabilities inherent in the way in which the City manages large-scale IT contracts. Indeed, while criminal conduct was the clear primary cause for the delays and cost overruns on CityTime, a secondary cause existed: the City lacked proper internal controls and other management safeguards to detect and prevent either the fraud which occurred or the delays and cost overruns that were its inevitable result.

DOI discussed these systemic issues in detail in a report issued on July 25, 2014. Our findings noted deficiencies in oversight, in accountability, and in planning for management of the CityTime project. Specifically, DOI identified six key deficiencies:

First: Inadequate executive oversight of the project by City officials;

Second: Failure to appoint an integrity monitor;

Third: Failure to control the expansion of the scope and cost of the project;

Fourth: Failure to hold contractors accountable for their inability to provide deliverables on schedule, and within budget;

Fifth: Failure to properly vet contractors and subcontractors for conflicts of interest and potential fraud; and

Sixth: Failure to plan for future City control over management and maintenance of the completed projects.

In response to these deficiencies, DOI issued six recommendations to the City.

First: The City must establish an effective executive governance structure for the management of future large-scale technology projects, that should include the creation of an interagency working group to oversee the project and the assignment of an on-site City project manager with the requisite technical expertise.

Second: The City should assign to all large-scale information technology projects an integrity monitor selected by DOI. The assigned integrity monitor should perform regular audits of the time worked by consultants on a project and analyze the hiring of consultants based on project needs.

Third: The City should create a more robust due diligence and approval process regarding large-scale technology contracts, amendments, and change orders.

Fourth: The City should hold contractors accountable for failures to provide deliverables on time and on budget by explicitly stating penalties in all contracts and enforcing those penalties where appropriate.

Fifth: Consultants on large-scale technology projects should be required to undergo a conflicts of interest background check; and the City should require that contractors disclose any subcontractors that receive \$100,000 or more and the City should vet and approve those subcontractors.

Sixth: The City should develop a plan on all large-scale technology projects to transition maintenance and control to the City at the conclusion of a project.

Underscoring the need for reform in this area, on May 19, 2014, Mayor de Blasio ordered a halt to work on the City's Emergency Communications Transformation Program ("ECTP"), pending a comprehensive review by DOI, the Department of Information Technology and Telecommunications ("DoITT") and the New York City Comptroller's Office.

The City launched ECTP in 2004 as an initiative to modernize New York City's 911 emergency communications system. In ordering the temporary halt of ECTP, Mayor de Blasio cited the program's costs and delays, as well as "significant and long-standing technical design, systems integration, and project management risks and issues that necessitate immediate corrective action."

As requested by the Mayor, DOI issued a preliminary investigatory report on August 6, 2014. While our investigation into ECTP is ongoing, it is clear that themes

examined in both our CityTime investigation and our preliminary ECTP report reveal a shortcoming in the way the City managed these contracts, and common themes between both of those projects. For example, our preliminary report on ECTP noted vague lines of authority and ineffective governance, a lack of advance planning with respect to specifications and objectives of the project, and a lack of an integrity monitor—all vulnerabilities uncovered in our earlier report on CityTime. We look forward to releasing our full report on ECTP at the conclusion of our investigation.

DOI is committed to the mandate we have to examine the policies and procedures of City agencies and to make recommendations, with the goal of better safeguarding taxpayer dollars and ensuring the most efficient and effective delivery of vital government services. To effectively fulfill that mandate, we must work closely with the relevant agency heads for each of our investigations. To that end, I note that DOI is currently working collaboratively with the Mayor's Office of Contract Services and DoITT to explore the best ways to address our concerns surrounding large-scale IT contracts in practice. Even as our current investigation into ECTP is ongoing, with the information already revealed, we are able to anticipate needed areas for reform and proactively address those needs.

I also support this body's historical and ongoing efforts in examining how the City can implement additional safeguards against cost overruns and fraud with respect to large-scale IT contracts, which, as I have described, by their nature have particular complexities distinct from other kinds of city contracts. I and members of my staff have had productive conversations with Chair Rosenthal, and we will continue that dialogue going forward.

I am happy to take any questions you may have at this time.

**DEPARTMENT OF INFORMATION TECHNOLOGY AND TELECOMMUNICATIONS TESTIMONY
BEFORE THE CITY COUNCIL COMMITTEES ON CONTRACTS, TECHNOLOGY, AND
OVERSIGHT & INVESTIGATIONS
RE: INTRO. 0498-2014 / CONFLICTS OF INTEREST IN CITY CONTRACTS
MONDAY, DECEMBER 15, 2014**

Good afternoon Chairs Rosenthal, Vacca, and Gentile members of the committees on Contracts, Technology, and Oversight and Investigations. My name is Anne Roest and I am the Commissioner of the Department of Information Technology and Telecommunications, or DoITT, and New York City Chief Information Officer. Thank you for the opportunity to testify today.

As the City's IT agency, DoITT supports the underlying technology and systems for many City agencies and entities, and provides assistance in facilitating implementation of programs where it can offer expertise and advice. While DoITT is not involved in all of the City's large-scale technology initiatives, it has played key roles in many. Our experience has led us to the firm belief that the better managed a project is, the less likely it is to be susceptible to fraud and waste. As Commissioner I intend to instate stronger governance practices for all DoITT-led projects and look forward to working with the City's technology leadership to define a larger, citywide approach to governance.

I will focus my remarks today on one such large tech initiative DoITT is currently actively engaged: the Emergency Communications Transformation Program, or ECTP. I have been tasked with assessing, restructuring, and managing ECTP since my appointment last spring, and offer this insight as an example of a rigorous evaluation of a multi-stakeholder, multi-year initiative that has significant impact on New Yorkers. There are also similarities between ECTP and other large technology initiatives the City has undertaken, and there are lessons to be gleaned across these programs.

In 2004, the City of New York began the ECTP, a five-year project to modernize and consolidate the City's 911 emergency communication system – the most complex and expansive system in the nation. As you may recall, eight years later, in December, 2011, as part of the ECTP, the NYPD and FDNY 911 operations were co-located into the first Public Safety Answering Center (PSAC). Since then, the City has been moving toward the development of the second PSAC, in the Bronx, to ensure fully-redundant 911 operations for the first time in its history.

By the end of 2013 the projected opening date for PSAC 2 was December 2015. During a May 2014 briefing for the City's First Deputy Mayor, however, it was communicated that the go-live date for PSAC 2 had slipped dramatically and would now be delayed to 2018. In addition to this delay, the cost was expected to increase significantly. Finding this to be unacceptable, and knowing the history of the program, the First Deputy Mayor ordered a full assessment of all facets of the program. DoITT was to focus its particular review on the technological components of ECTP and where processes and practices could be improved to ensure successful delivery of PSAC2 and all of its technology.

DoITT's report, issued on August 6, 2014, was a full review of the technological aspects of ECTP including budget, schedule, and governance. In it, DoITT made several recommendations on how to correct any deficiencies in the overall management of the program going forward. I would like to review for the committees some of the recommendations the City has been implementing in an effort to improve the 911 emergency communication system.

Hopefully, our findings will lend themselves to offering guidance as the City assesses its processes for the management of future large-scale city contracts – IT or otherwise.

Governance Recommendations

On large projects – and especially large IT projects – we know we need a governance model that offers clear accountability or direction for stakeholder decision making and escalation. With regard to ECTP, that model should enable, and require, sustained participation from all stakeholder agencies for the duration of the program, and include executive-level oversight with active and committed participation from agency heads.

Accordingly, as part of our governance recommendations we created the ECTP Steering Committee, responsible for directing and advising the ECTP Program Management. Its role is to understand the key issues, risks and requested changes, approve or escalate budgetary-related changes, and to provide advice and decision making for escalated items. In short, the Steering Committee's role is to monitor program progress and carry back information about its decisions to the respective segments of the program.

We also took management control back from the systems integrator (SI),¹ making it clear that we are responsible for the successful outcome of the project. In short, we can outsource work, we can outsource management tasks, but we cannot outsource responsibility.

Schedule Recommendations

Our review indicated that large IT programs can be divided into multiple, smaller, and more manageable projects. Breaking up very large technology initiatives into smaller, more discrete and attainable parts can allow the City to adapt to advancing technologies as well as expand the pool of potential vendors able to successfully bid on a project.

Budget Recommendations

To exert greater direct control of ECTP, we recently reduced the number of consultants managing delivery of PSAC2 from nearly 140 to just over 30, and shifted much of their responsibility to City staff. Our review also found that the City could get the best value by developing a sourcing strategy for the remaining procurements. We eliminated “layered procurements” – and therefore layered markups – by buying directly from the source rather than buying through a systems integrator.

Vendor and Contract Management Recommendations

Our findings also indicated the value of appointing a Vendor and Contract Management lead, and providing staffing necessary to effectively oversee the numerous vendor engagements and contracts associated with the program. We are seeking to eliminate layers of vendors wherever possible, so that the vendor directly responsible for delivery is in turn directly communicating with stakeholders and City program management – not with other vendors.

The lessons we have learned from our ECTP review validate some related initiatives DoITT has underway, and which I would like to conclude with here.

¹ Systems Integration refers to the design, build, and implementation of applications, networks, systems, or IT infrastructure. In layman's terms, a Systems Integrator is the contractor responsible for ensuring that all the technological components of a program work together.

First, DoITT has recently launched new citywide SI contracts, the first ever standard technology contracts developed specifically for New York City projects. Open to agencies and entities citywide, these contracts offering competitive pricing, well-defined requirements, and performance standards, and are written in plain language for ease-of-use by technical and non-technical project managers and executives alike. These contracts also open up City technology initiatives to a wider range of companies by dividing projects into two classes – those up to \$5 million and those up to \$25 million.

Included in these contracts are greater accountability and protective measures for the City, such as a requirement for performance demonstration requirements, code reviews, and deliverable inspections at any time. If it becomes apparent that a project is not meeting deadlines or will launch late, the City is able to default the contractor without any delay.

As another example of our work to address challenges with contract delivery, DoITT developed the Project Management Office “Workshop Training Program.” In an effort to share knowledge and constantly improve the way we work, DoITT offers workshop training on Program/Project Management and Project Delivery topics. Over the past three years we have conducted more than 200 workshops for more than 1500 participants from 30 different City agencies. Sessions are typically two-hour long, high-level, informal discussions, on topics including “Project Management Work Planning,” “Project Management Risk Management,” and “Requirements Elicitation.”

Effective contract and project oversight is a critical function of any government, particularly for one as large and complex as ours. I hope DoITT’s experience in reviewing and administrating large-scale contracts can prove instructive as the City pursues future large-scale IT initiatives to improve the delivery of services to New Yorkers.

I thank the committee members for their time this morning, and happy to take any questions you may have

Thank you.

**Testimony of Lisette Camilo,
City Chief Procurement Officer and
Director of the Mayor's Office of Contract Services**

**Before the New York City Council Committees on Contracts, Oversight and Investigations
and Technology**

December 15, 2014

Good morning Chairs Rosenthal, Gentile, Vacca and members of the City Council Committees on Contracts, Oversight and Investigations and Technology in Government. I am Lisette Camilo, City Chief Procurement Officer (CCPO) and Director of the Mayor's Office of Contract Services (MOCS). Thank you for the opportunity to testify today regarding lessons learned and recommendations for improving New York City's management of large information technology contracts and Int. 498 of 2014 relating to conflicts of interest in City contracts.

Information technology plays an essential role in almost every service that the City provides. From education and public safety to human services and the maintenance of our streets and roads, IT helps New York City be more accessible, equitable, transparent and effective for all of our residents. These values are all central hallmarks of Mayor de Blasio's administration.

Maintaining the public's trust in government actions is also of the highest importance to this administration, particularly in preserving the integrity of the City's procurement processes. The basic legal framework of the procurement process is to assure the prudent and economical use of public money for the benefit of all City residents and to guard against fraud, corruption and favoritism. New York City is one of the largest procuring government jurisdictions in the nation. In Fiscal 2014, the City spent \$17.7 billion in procuring goods and services for New Yorkers via over 43,000 contract transactions. MOCS works to ensure that agencies comply with all applicable laws and rules associated with procurement. We accomplish this by reviewing solicitation and award documentation to confirm that all requirements were adhered to and

providing technical assistance to agencies and vendors to ensure that both the spirit and letter of those requirements were followed. We work very closely with our partners, including the Department of Investigations in particular, to ensure the integrity of the system.

Int. 498

Int. 498 would require the CCPO to create standards and procedures for contractors to determine the existence of any conflict of interest, as defined in Chapter 68 of the City Charter, which may exist between a City employee and the contractor, subcontractor, or an independent contractor of the contractor. Contractors entering into any agreement with an agency, elected official, or the City Council that has a value of \$10 million or more (alone or in the aggregate) during the preceding 12 months must certify that they complied with the standards and procedures set forth in the bill, and that no conflict of interest exists.

This Administration supports safeguarding against conflicts of interest in city contracting. While we believe that the City can do more to further this goal and avert the waste or fraud that can arise on the rare occasion as a result of conflicts, we do not believe that Int. 498 would provide tools for improving the City's ability to detect potential conflicts of interest before a contract is awarded. Despite its admirable intentions, we do not believe that the bill achieves such goals for two main reasons: 1. there are substantive issues with the bill; and 2. the bill raises practical concerns.

1. Substantive issues with Int. 498

Int. 498 purports to incorporate the provisions of Charter Chapter 68 to prevent conflicts of interest "between a city employee and the contractor or a subcontractor or independent contractor of the contractor." However, Chapter 68 governs conflicts of interest between City officers and employees and the City of New York. Perhaps more fundamentally, Chapter 68

applies to current (and former) City officers and employees, and not to contractors. It is therefore difficult to find a basis for requiring a contractor to certify that City employees (who are not within the control or oversight of the contractor) have no conflicts of interest under Chapter 68.

Additionally, this bill would infringe upon the authority of the COIB as set forth by the Charter to promulgate rules necessary to implement and interpret the provisions of Chapter 68 regarding conflicts of interest. By requiring the CCPO to establish standards and procedures for contractors to determine the existence of any conflict of interest, the bill incorrectly grants authority to the CCPO to interpret Chapter 68 of the Charter. The COIB is the only agency vested with this power under the Charter, and by requiring the CCPO to share this authority, the bill could easily create a number of problematic, though unintended, consequences. One such consequence may be the issuance of standards and procedures that may not be consistent with the COIB interpretation of Chapter 68 which may result in inaccurate guidance to vendors.

In the case of such incorrect guidance, the COIB may nevertheless prosecute the City employee in question for a violation of the conflicts of interest law because it is only advice from the COIB itself that will provide immunity from prosecution. Determining whether or not there is a conflict of interest related to a particular City contract requires the expertise of the COIB, which neither the CCPO nor vendors have, and requiring such certification as a pre-requisite to entering into a City contract may result in conflicting guidance and a risk of prosecution.

Finally, under the Charter, the Procurement Policy Board (PPB) was designated as the body to promulgate rules regarding the procurement process. The PPB has already enacted a number of provisions that address conflicts of interest in City contracting which I will discuss a

bit more thoroughly below. Int. 498 would seemingly impede on the powers vested in the PPB by City Charter section 311 to set such rules regarding City procurement.

2. The bill raises practical concerns

In addition to the substantive concerns related to this bill, I would be remiss if I did not mention the practical effect of the certification requirement on the procurement process generally. The procurement process in New York City is long and complex. Throughout the years, a number of requirements have been added to the process. These additional requirements furthering very important policies (including policies that support the basic legal framework of procurement and those that further other important ones) have resulted in a very long and complicated process that is difficult to navigate by both agencies and vendors alike. It can take agencies over a year to get through a single procurement due to all of the requirements placed on agencies and vendors. A complicated and drawn out process discourages good vendors from submitting bids or proposals, which means that the City may not be getting the best goods or services in some circumstances. The additional mandate that Int. 498 requires, one whose policies may result in conflicting guidance to vendors and would further complicate the process, would not be effective.

Conclusion

The City has a number of tools already in place that address conflicts of interest related to City contracts: Chapter 68 of the City Charter, as administered and interpreted by the COIB; PPB Rules; the VENDEX questionnaires; and standard City contracts themselves all contain provisions that govern or address potential conflicts of interest of public servants in City contracting. The PPB rules, which govern the procurement of goods and services by the City of New York, include express language regarding the ethical conduct of public employees and

vendors. For example, the rules mandate that vendors and their representatives deal ethically with the City and its employees and are required to give the City complete and accurate information, avoid conduct that would limit competition, and not ask that public servants take actions that would violate the law, the PPB rules, or rules' ethical standards.

Conflicts of interest provisions are also specifically included in the City's standard contracts. For example, Appendix A, (General Provisions Governing Contracts for Consultants, Professional, Technical, Human and Client Services) includes language prohibiting the contractor from employing "a person or permit[ing] a person to serve as a member of the Board of Directors or as an officer of the Contractor if such employment or service would violate Chapter 68 of the Charter."

The City also requires disclosures in VENDEX questionnaires from vendors, prior to receiving contract awards, and subcontractors, prior to approvals, of information relating to possible conflicts of interest with City employees. Agencies are required to examine these disclosures when evaluating them. Any disclosure that results in the suspicion of a conflict must be referred, as required by the PPB rules, by the contracting agency to the COIB for further guidance.

These foregoing rules, policies, standard contracts and VENDEX requirements create a solid framework within which we work to prevent conflicts of interest in City contracts. Though we have a solid framework, we should work together within that framework to prevent the rare occasion where conflicts exist in City contracting. We would like to work with our partners in government towards a solution that achieves that goal without impinging on the duties of COIB and PPB and without adding delay to the procurement process.

Thank you for the opportunity to provide comments on this legislation. I welcome your questions and comments.



CITIZENS UNION OF THE CITY OF NEW YORK
Testimony to the NYC Council Contracts,
Oversight & Investigations and Technology Committees
On the City's Technology Contracts and Conflicts of Interest (Intro. 498)
December 15, 2014

Good morning Chairs Rosenthal, Gentile and Vacca, and other members of the Council Contracts, Oversight & Investigations, and Technology Committees. My name is Rachael Fauss, and I am the Director for Public Policy for Citizens Union of the City of New York. Citizens Union is a nonpartisan good government group dedicated to making democracy work for all New Yorkers. Citizens Union serves as a civic watchdog, combating corruption and fighting for political reform.

Thank you for holding this hearing today. We applaud the Council for exercising its important oversight role to ensure that protocols are in place to protect taxpayers and ensure public trust in city government. While the city has put in place some reforms after the CityTime scandal, continued diligence on contracts – particularly large technology projects – is essential. Technology is the backbone of how government operates in the 21st century; its potential to reduce costs, improve service delivery and open up government to the public should not be underestimated, or squandered in contracts that do not deliver as promised.

In addition to management issues regarding contracts, the Department of Investigations (DOI) report on CityTime¹ made it clear that conflicts are not appropriately vetted in the contracting process, particularly for subcontractors. Under the kick-back scheme utilized in the CityTime scandal, subcontractors were used which were controlled by family members of the main project consultant, pointing to the need for greater vetting of such conflicts.

Specifically regarding Intro 498, we support its intent to vet contacts for conflicts of interest. The city has already made some progress in shedding light on subcontractors; in 2013, the City Comptroller's Checkbook web platform began listing payments to subcontractors.² Intro 498 would continue this important progress in ensuring the accountability of subcontractors. In reviewing the legislation, we have some comments for the committee to consider:

- The legislation as drafted refers to Chapter 68 of the City Charter, which establishes the conflicts of interest law for city employees. While much will be applicable to contractors, it may be preferable to enumerate the conflicts that will be vetted or to be considered by the city's chief procurement officer in establishing standards and procedures, as there may be elements that do not apply in Chapter 68, or additional areas that should be covered unique to contractors and subcontractors. Chapter 68

¹ New York City Department of Investigation CityTime Investigation: Lessons Learned & Recommendations to Improve New York City's Management of Large Information Technology Contracts. July 25, 2014. http://www.nyc.gov/html/doi/downloads/pdf/2014/July-2014/pr13citytime_72514.pdf

² Office of the NYC Comptroller. "Comptroller Liu And Mayor Bloomberg Announce Sweeping Reforms To City Subcontracting Requirements," March 19, 2013. Available at: <https://comptroller.nyc.gov/wp-content/uploads/2013/07/PR13-03-044.pdf>

does not specifically address the conflict risks that arise in contractor-subcontractor transactions. In formulating standards and procedures, the chief procurement officer should perhaps be directed to be sure to address those risks. Citizens Union is in the process of consulting with experts in this area, and will provide more specific feedback on how to implement this recommendation in the coming days.

- Second, the Conflicts of Interest Board and the City Comptroller could play an advisory role to the city chief procurement officer in the development of the regulations to implement the law, given their respective areas of expertise.
- We would also like to note that DOI cautions that the conflicts of interest background checks “should be carefully crafted to avoid creating undue delays and costs to the process.” We agree with this sentiment, knowing that regulatory checks should be balanced with the desire to ensure that more vendors, particularly smaller minority and women-owned businesses, are able to compete for contracts and not be held up due to overly burdensome reporting requirements.

Regarding the other findings of the DOI report, we encourage the Council to probe deeply and determine what other steps should be taken – legislatively and administratively – to ensure that we learn from the mistakes of the past.

Citizens Union has not fully vetted the proposals, but supports their intent to ensure that conflicts of interest are addressed, and that the city is utilizing proper financial controls and cross-agency coordination. The assignment of an outside integrity monitor to monitor large information technology (IT) contracts in particular should be thoughtfully examined further given the past pattern of abuses, and continued problems.

For example, a similar pattern of cost overruns occurred with the 911 contract, which is currently under investigation by the DOI and was audited by the City Comptroller’s Office earlier this year. We are encouraged by the City Comptroller’s Directive 31³, which addresses some of the issues highlighted by the CityTime scandal and 911 contract, particularly regarding controls regarding consultants authorizing payments on timesheets rather than city personnel, but agree that more needs to be done.

Lastly, Citizens Union would encourage the council committees to examine the potential role for city’s Technology Development Corporation⁴ in overseeing technology projects, which was newly formed in 2013 in recognition of the city’s lack of expertise in managing IT projects. Some of its current projects include developing a system to intake, validate and issue Municipal IDs, and developing an outreach system for enrollment in Pre-K, including quality control and project monitoring.

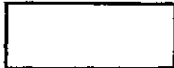
Thank you again for providing the opportunity for Citizens Union to provide its thoughts on the city’s contracting process. I am happy to answer any questions you might have.

³ <http://comptroller.nyc.gov/wp-content/uploads/2014/05/Directive31.pdf>

⁴ <http://www.nyctdc.org/html/about/about.shtml>

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I represent: Citizens Union

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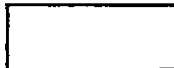
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I represent: Conflicts of Interest Board

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I represent: MOCs

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