

**Testimony of Commissioner Lorelei Salas  
New York City Department of Consumer and Worker Protection**

**Before the  
New York City Council Committee on Civil Service and Labor**

**Hearing on  
Introduction 800-A-2018**

**May 28, 2019**

Good morning Chairman Miller and members of the committee. My name is Lorelei Salas and I am the Commissioner of the New York City Department of Consumer Affairs, recently renamed the Department of Consumer and Worker Protection (DCWP). I would like to thank the committee for the opportunity to testify today about Introduction 800 (Intro. 800), a bill that would, for the first time, require employers to provide paid personal time to New York City workers. In January, Mayor de Blasio announced that New York City would become one of the first jurisdictions in the nation to require employers to provide two weeks of paid personal time. The bill before you today, which has been informed by discussions with workers, employers and other stakeholders, Public Advocate Jumaane Williams, and the Council, will make that commitment a reality. This proposal is another important piece of Mayor de Blasio's commitment to making New York the fairest big city in the nation by advancing worker rights and protections.

New Yorkers work hard. We may be called "the city that never sleeps," but that doesn't mean that hard-working New Yorkers should be forced to miss important family and life events – like parent-teacher conferences, weddings, funerals, or anniversaries – because they can't get time off work or afford to go without a paycheck. Workers in the greatest city on earth shouldn't be made to choose between keeping a job that supports their families and having enough time to rest, recharge, or handle family matters. Unfortunately, that is the reality for the up to one million New Yorkers who do not currently have *any* paid personal time.<sup>1</sup>

The lack of paid personal time affects workers in all industries and walks of life, but it is especially glaring among those workers who have the most precarious schedules and are paid the lowest wages.<sup>2</sup> Part-time workers are significantly more likely to lack access to paid personal time than full-time workers.<sup>3</sup> In addition, low and middle-income workers are less likely to receive paid personal time than their higher-income peers.<sup>4</sup> Time to rest and recharge should not be a privilege enjoyed mainly by the most stable and well-paid workers in our city. All New Yorkers – no matter what type of work they do or how much money they make – deserve a day off.

---

<sup>1</sup> Department of Consumer and Worker Protection estimates based on the following sources: Bureau of Labor Statistics, Quarterly Census of Employment and Wages; Bureau of Labor Statistics, National Compensation Survey; Census Bureau, County Business Patterns Dataset; Infogroup, U.S. Business Database; and Community Service Society, Unheard Third Survey.

<sup>2</sup> COMMUNITY SERVICE SOCIETY, POOR, PART-TIME, RETAIL AND TIPPED WORKERS AND THOSE EMPLOYED BY SMALL BUSINESSES ARE LEAST LIKELY TO HAVE PAID VACATION DAYS IN NYC 1 (2018), available at <https://secure.cssny.org/page/-/UHT%202018%20paid%20vacation%2011019.pdf>.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

The benefits of paid personal time – for workers, businesses, and the economy as a whole – are clear. Vacation and time off from work are associated with improved health, lower stress, lower likelihood of depression, and more happiness at home and at work.<sup>5</sup> Paid time off is associated with higher employee morale and retention, less burn-out, and higher worker productivity.<sup>6</sup> Experts like former Secretary of Labor Robert Reich agree that paid personal time is “good for workers, good for employers, and good for the economy.”<sup>7</sup>

Countries across the globe have recognized the importance of paid personal time by enshrining the right to time off in national and regional laws. According to a 2012 report by the International Labor Organization, an “overwhelming majority” of countries have established a right to a minimum period of annual leave by law.<sup>8</sup> A majority of countries in every region across the globe – from Asia, to Africa, the Middle East, Europe, and Latin America – guarantee a minimum amount of paid personal time for workers.<sup>9</sup> Germany, one of the strongest and most productive economies in Europe, currently mandates a minimum of four weeks paid vacation per year.<sup>10</sup>

Unlike these countries, the United States does not currently mandate paid personal time at the federal level. Nor does any state or city in the country. Today, we have the opportunity to change that and to send a message that workers deserve better. As Mayor de Blasio put it: “We as a nation need to get there, and New York City will lead the way.”

I will now discuss the specifics of the proposal before you. Intro. 800 builds on the framework established by New York City’s landmark paid safe and sick leave law. The bill requires employers with at least five employees or one domestic worker to provide at least up to 80 hours of paid personal time per year to their workers. The amount of time is a minimum labor standard; employers may, and are encouraged, to provide their workers with more generous paid personal time if they so choose. The universe of employees covered by this bill would be the same as those covered by paid safe and sick leave, easing the implementation burden on employers. Like the paid safe and sick leave law, this bill applies to both full and part-time workers. Paid personal time would accrue on an earned basis at the same rate as paid safe and sick leave: one hour of leave earned for every 30 hours worked. Employees would be entitled to use personal time for any reason.

Today, we expect to hear from workers, businesses, and advocates and we welcome their input on the proposed bill. The Administration conducted extensive outreach to affected communities to hear questions and concerns and inform the development of this proposal. Over the course of

---

<sup>5</sup> Tanya Mohn, *Take A Vacation: It's Good for Productivity and the Economy, According to a New Study*, FORBES (Feb. 28, 2014, 11:58 PM), [www.forbes.com/sites/tanyamohn/2014/02/28/take-a-vacation-its-good-for-productivity-and-the-economy-according-to-a-new-study/#46c9d1c75a33](http://www.forbes.com/sites/tanyamohn/2014/02/28/take-a-vacation-its-good-for-productivity-and-the-economy-according-to-a-new-study/#46c9d1c75a33).

<sup>6</sup> OXFORD ECONS., AN ASSESSMENT OF PAID TIME OFF IN THE U.S.: IMPLICATIONS FOR EMPLOYEES, COMPANIES, AND THE ECONOMY (2014), available at <https://www.oxfordeconomics.com/my-oxford/projects/280061>.

<sup>7</sup> Robert Reich, *Back from Three Weeks Vacation with a Modest Proposal* (Aug. 9, 2012), <http://robertreich.org/post/29087677974>.

<sup>8</sup> INT'L LABOUR ORG., WORKING CONDITIONS LAWS REPORT 16 (2012), available at [https://www.ilo.org/wcmsp5/groups/public/---ed\\_protect/---protrav/---travail/documents/publication/wcms\\_235155.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---travail/documents/publication/wcms_235155.pdf).

<sup>9</sup> *Id.* at 18.

<sup>10</sup> Reich, *supra* note 7.

several roundtable events, we received helpful feedback from large employers, small businesses, unions, community based organizations and policy groups, and of course workers themselves.

You may hear today that New York City employers simply cannot afford to give workers a break, or that the law will be too difficult for businesses to implement. Many of these same objections were raised when New York City became the largest jurisdiction in the country to provide workers with paid safe and sick leave. Time and experience have shown that an overwhelming majority of businesses were able to implement the law's requirements with City outreach and support and without a measurable loss in profits or productivity. A 2016 report co-authored by the Center for Economic and Policy Research and The Murphy Institute, entitled "No Big Deal: The Impact of New York City's Paid Sick Days Law on Employers," found that nearly 85% of employers reported no changes in costs due to the paid safe and sick leave law.<sup>11</sup> In fact, since paid safe and sick leave went into effect, New York City's economy has boomed and our city now has more private sector jobs than ever before in history.<sup>12</sup>

In addition, DCWP's experience helping businesses implement and comply with paid safe and sick leave will inform our approach to this process. DCWP will provide businesses with helpful aids like leave trackers, request forms, and notices of employee rights, just as we do now for paid safe and sick leave. This experience also includes our extensive engagement with industry stakeholders and worker communities. Since 2014, we have conducted almost 1,600 outreach events distributing more than two million pieces of literature to promote worker awareness and business education. We believe New York's businesses are the most dynamic and innovative in the country and that they will be able to implement a law that helps increase productivity and ensure their workers have time to not just survive, but to live fulfilled lives with their families and loved ones.

I am honored to be here today to urge the passage of this legislation. I would like to thank Public Advocate Jumaane Williams, Speaker Corey Johnson, Chairperson Miller and the employer and worker stakeholders who have been generous with their time in offering feedback. Today, New York City has the opportunity to send a message: workers deserve better. Working in our city should mean more than just making ends meet. It should mean time, and peace of mind, to be present for the moments that shape our lives and the lives of those we love: the marriage of a brother or sister or parents' anniversary, the funeral of an aunt, uncle, or close friend, time to visit family abroad, learn a new skill or prepare for an exam, or just enjoy time off to rest and recharge with friends and family. For some New Yorkers, paid personal time will mean the opportunity to keep an immigrant family together across borders or bring family and friends together to celebrate a religious holiday that they would not otherwise get off. This bill will give workers the time they deserve, whatever that means for their lives.

Thank you for the opportunity to testify and I am happy to answer any questions.

---

<sup>11</sup> EILEEN APPELBAUM & RUTH MILKMAN, CTR. FOR ECON. AND POLICY RESEARCH, NO BIG DEAL: THE IMPACT OF NEW YORK CITY'S PAID SICK DAYS LAW ON EMPLOYERS 3 (2016), available at <http://cepr.net/images/stories/reports/nyc-paid-sick-days-2016-09.pdf>.

<sup>12</sup> *Labor Statistics for the New York City Region*, N.Y. DEP'T OF LABOR, <https://www.labor.ny.gov/stats/nyc/> (last visited May 23, 2019).



### In opposition to Intro 800A – Requiring provision of paid personal time

Good morning. My name is Kathleen Reilly and I am the NYC Government Affairs Coordinator for the New York State Restaurant Association. We are a trade group that represents food and beverage establishments in New York City and State. We are the largest hospitality trade association in the State, and have advocated on behalf of our members for over 80 years. Our members are one of the largest and most impacted constituencies regulated by the City, as nearly every agency regulates some aspect of the restaurant industry.

Restaurants are crucial to the economic and cultural fabric of New York City – they employ hundreds of thousands of New Yorkers, they fuel tourism, and the many small, immigrant-owned, minority and women owned restaurants contribute to the vibrancy of our city. Restaurants provide important and sought-after jobs, and many of the New Yorkers who choose employment in the restaurant industry do so for the flexibility, which allows them to also pursue their passions or attend to other responsibilities in their lives – such as school, or parent or child care. To ensure the continued viability of the restaurant industry, New York City must prioritize regulations that enable these hardworking New Yorkers to continue earning their livelihoods, and remember to consider this crucial industry when crafting wide-reaching policy.

I am here today to express opposition and concern over Intro 800A, which has been introduced by Public Advocate Williams and co-sponsored by Council Members Rosenthal, Levin, Lander, Chin, and Rivera. This proposal would require all employers in the City with 5 or more employees to provide paid personal time, in addition to the paid sick and safe time which is already required. Employees would accrue this time, much like safe and sick time, and would be entitled to accrue 2 weeks (10 days) of personal time on top of 1 week (5 days) of sick and safe time. The New York State Restaurant Association is opposed to Int 800A, for reasons of both expense and scheduling burden.

On the issue of expense – it seems almost every time NYSRA comes to testify before City Council, we make a point to contextualize new, costly proposals in the current difficult climate for our industry in New York City. As the minimum wage has increased, and especially since the most recent wage hike at the new year, New York City is seeing its restaurant industry struggle. Employers are cutting jobs and decreasing hours, staffing as few people as it can manage while maintaining their standard of service, trying to cut costs and often raising prices. On top of wage increases, employers contend with high rents, and an ever-growing list of regulations which are costly to track and meet, and even costlier to inadvertently violate. In this environment, the City is looking to impose yet another mandated increase to employee compensation, and it isn't something the restaurant industry can afford.

For a small restaurant employing just 20 people, this proposal would cost the employer at a minimum, \$24,000 more each year. There isn't \$24,000 extra in the budget – a truth that City

Council itself has acknowledged in the past, when you passed the Awnings Act several months ago. If businesses didn't have \$5,000 for an awning fine, they certainly don't have \$24,000 to pay for vacations. Putting this legislation into effect will cost jobs. Passing this legislation will effectively pad the compensation packages of some workers at the expense of others' jobs. Arguably, these laid off folks may be able to find work elsewhere – but keep in mind that when employers are forced to make difficult choices about who they can afford to employ, it's going to be the young people, the students, the people with unpredictable schedules, the people who might most need an employer to take a chance on them (whether that be English language learners, new immigrants, formerly incarcerated people) who will likely bear the brunt of this.

Besides costs, our other major concern is scheduling burden. First of all, it's worth noting that the restaurant industry particularly attracts people seeking a flexible work schedule, because of its ability to accommodate different work schedules from week to week. The ability to be flexible is the purported goal of this legislation, and the restaurant industry already provides that. Unfortunately, what this legislation actually provides is an increase in the number of days that employees can call out last minute from 5 – safe and sick days already earmarked for this purpose – to 15. As it is written, an employee using their personal time can call out when it's "practicable" so long as the reason is "unforeseeable." In stark contrast to the way the safe and sick leave portion of the law is written, we do not get an enumerated list of what kinds of emergency would qualify – we don't even get an expectation that it be an emergency. In the safe and sick leave policy, there is an implicit understanding that calling out last minute is burdensome to an employer, so the reasons for doing so must be legitimate and serious. It appears that this understanding did not carry over to personal time, in which an employee would be allowed to "unforeseeably" accept a last-minute long weekend trip upstate, or just "unforeseeably" wake up and not feel like coming in that day.

The legislation would allow employers to maintain a rule requiring 14 days (but no more!) of notice before taking "foreseeable" personal time. There is no concrete differentiation laid out between foreseeable and unforeseeable leave in this policy, which severely weakens an employer's ability to enforce such rules. Beyond that, by creating a cap of 14 days' advance notice, this provision combined with the predictive scheduling law forces any affected restaurant to be double-punished by employees taking leave. As you may recall, predictive scheduling requires chain businesses to finalize schedules of their employees two weeks in advance. If any new shift is scheduled within two weeks, such as calling in a replacement when an employee calls out, that replacement is paid additional wages. If these businesses are prevented from asking for any more than 14 days' notice of planned leave, then they are automatically forced to work within the punitive framework of the predictive scheduling law, and will wind up paying the person out on leave, as well as paying extra to that person's replacement.

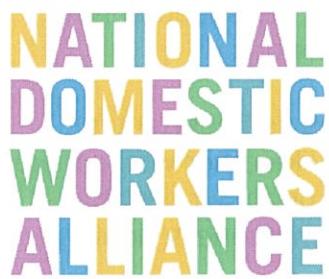
In conclusion, the New York State Restaurant Association must strongly oppose Intro 800A, because of the heavy costs to restaurants and the scheduling burden it would create. Restaurants are already struggling to keep afloat in this extremely difficult business environment, and mandating 2 weeks of paid personal time would exacerbate these issues and cost people their jobs. The restaurant industry, and the entire service industry, would also be particularly affected by the scheduling burden of Int 800A. If too many people call out from a restaurant on the same day, or around busy periods, the business can grid to a halt. This proposal does not allow restaurants to set blackout periods for time off, nor does it put any teeth on a rule for 2 weeks'

---

notice. It creates a gigantic loophole around “unforeseeable” usage, which has been a primary concern for the food service industry. As it is currently written, Int 800A would create a scheduling disaster for restaurants. We appreciate your attention to our concerns, and hope that you take them into consideration. We look forward to continued collaboration to create a fair and flourishing business environment for all New Yorkers.

Respectfully Submitted,

Kathleen Reilly  
NYC Government Affairs Coordinator  
New York State Restaurant Association  
315 W 36<sup>th</sup> St., 7<sup>th</sup> Floor  
New York, New York 10018



Jacqui Orie's testimony delivered to the  
New York City Council  
Regarding Proposed Int. No. 800-A  
EARNED SAFE, SICK AND PERSONAL TIME LAW ACT  
May 28, 2019

Good morning everyone. My name is Jacqui Orie and I am an organizer in New York City with the National Domestic Workers Alliance (NDWA). NDWA is home to the growing care and cleaning workforce that goes to work in American homes, supporting families. We are a powerful alliance of over 60 affiliate organizations and 3 local chapters, in 36 cities and 17 states. We are in regular contact with over 230,000 nannies, housecleaners, and caregivers for the elderly and people with disabilities.

For the past year I have outreached several hundred domestic workers and supported many to come forward to enforce their workers rights through our domestic worker rights clinic. I have also been a professional nanny for over 19 years for 4 families, and I currently still work as a part-time nanny. I am excited to share from my personal experience the importance of making Paid Personal Time a right for New York workers.

I immigrated to the U.S. from St. Lucia in 1999. In my very first job as a domestic worker I would get only 1 week of vacation time when my employers were traveling. I would be paid for part of the time they were away. I did not get paid sick days. With the families I worked with later, I started to negotiate and receive at least 2 weeks of vacation a year. I had one employer for whom I worked for 5 years, from 2001-2006 who traveled a lot. We negotiated paid time off that coincided with her travel. I would get an average of 6 weeks of vacation a year with her. In my next job from 2006-2013 we agreed on 5 sick days, 2 weeks of vacation, and 5 personal days each year - all paid. And currently in my part-time nannying job, I work 24 hours a week and we have agreed on 2 weeks of paid vacation and a minimum of 5 paid sick days a year, and more if needed.

I have had employers who have been fair, valued my work, and considered me important enough to have vacation and rest time. This made a difference in my life. I went back to the school and completed my college degree while also working as a nanny. I went to school full-time and worked full-time. The paid personal days and vacation days I had went a long way in ensuring I had the time to study for important exams and the ability to participate in enriching field trips that enhanced my learning.

In the future I plan to use my Paid Personal Time to further celebrate and explore my faith - there is a retreat in Kansas City I plan to attend later this year. I would like to take

Fridays off occasionally for self-care. And I want to deepen my involvement with NDWA. I have already in the past requested time off to lobby Congress for sexual harassment protections for domestic workers, lead actions speaking out against the separation of immigrant families, and attend national leadership development trainings.

Paid time off has allowed me the freedom to live my life fully. This is so important for domestic workers. We do very stressful work with long hours. Just like other workers we need time to care for ourselves and recover our energy in order to bring our best to our jobs. Paid Personal Time is also critical to our being mentally and emotionally healthy, and that is a human right.

# **Community Service Society**

Fighting Poverty  
Strengthening  
New York

**Testimony by**

**Irene Lew, Policy Analyst**

**Community Service Society of New York**

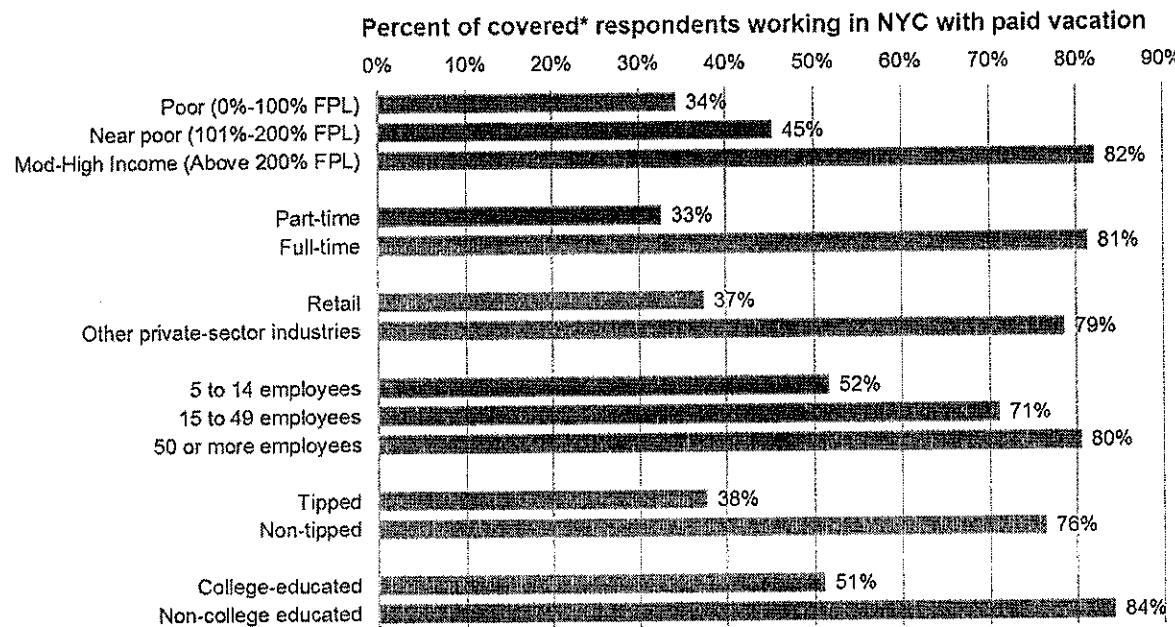
**May 28<sup>th</sup> hearing on Int 800A:**

**Requiring city employers to provide earned personal time to employees  
Before the New York City Council Civil Service and Labor Committee**

Thank you for the opportunity to testify today. My name is Irene Lew and I am a policy analyst at the Community Service Society of New York, a nonprofit organization that works to advance the upward mobility of low-income New Yorkers. We have supported the expansion of protections and benefits for low-wage workers, including a leading role in efforts to pass the paid sick days law in New York City. I am testifying in support of the proposed amendment to the city's paid sick time law requiring private-sector employers of five or more employees to provide an additional 10 days of paid personal time to their employees.

The drive for paid sick time was fueled by our research showing that lack of paid sick leave is a widespread problem among working New Yorkers, especially among low-income workers. National estimates, along with findings from our annual Unheard Third survey, show that low-income workers are also disproportionately impacted by the lack of paid vacation and would benefit from the proposed paid personal time bill. Nationwide, according to data from the Bureau of Labor Statistics, 41 percent of private-industry workers in the lowest 10 percent of wage earners had access to paid vacation, in contrast to 92 percent of those in the top 10 percent. Even when they do receive paid vacation days, low-wage workers receive far less than what is available to their higher-wage counterparts. After a year on the job, a worker in the lowest 10 percent of wage earners had just 5 days of paid vacation on average while a worker in the top 10 percent had twice that amount (11 days).

CSS's 2018 Unheard Third survey found that employees least likely to have paid vacation now are those with low incomes, working part-time, employed by small firms, working in the retail sector or relying on tips. These are the employees who would most benefit from the proposed law. Among New York City residents who would be covered by the proposed paid personal time provision, only 34 percent of the working poor and 45 percent of near-poor workers (between 100-200 percent of the FPL) had paid vacation from their employers compared to 82 percent of moderate to higher income employees with incomes above 200 percent of the federal poverty level.



Source: CSS, 2018 Unheard Third.

\*Covered workers refers to survey respondents working at private-sector firms in New York City with 5 or more employees. Excludes the self-employed, those working in the public sector, those working at firms with fewer than 5 employees and those working outside of New York City.

It is especially important, and laudable, that the bill will cover employees working for firms with five or more employees. According to our Unheard Third survey data, 52 percent of private sector employees in businesses with five to 14 employees reported having paid vacation, while 80 percent of those working for employers of 50 or more did. By covering employees at firms with at least five employees, paid vacation would also be easier to administer because the existing paid safe and sick time law covers the same group of employees. Part-time employees and retail workers will also benefit from the personal time bill because they are among those least likely to have any paid vacation days. Only a third of part-time employees who would be covered by the paid personal time bill have paid vacation compared to over 80 percent of full-time workers. And only 37 percent of retail workers said that they received paid vacation from their employers, in contrast to 79 percent of those working in other private-sector industries.

We support the paid personal time bill but have some concerns about the proposed legislation that we hope the City Council will address. There is a technical problem in how the accrual rate is crafted. As written, it does not enable workers to actually accrue 10 days of personal time. Even when working a full-time schedule of 40 hours a week year-round, a worker will not accrue 80 hours of personal time. At the accrual rate of one hour of personal time for every 30 hours worked, a full-time year-round worker will only earn a maximum of 69 hours of personal time. It would take a full-time, year-round worker more than a calendar year to accrue 10 days of personal time at the current rate proposed in the legislation. We urge the City Council to adjust the accrual rate in the bill so that covered workers will receive the full 10 days of paid personal time intended in a year. To make it easier for employees and employers to track accrued time, as well as streamline administration for employers, the City Council could consider establishing the same, faster accrual rate for both personal and sick time. For example, a worker could accrue one hour of paid personal time and one hour of paid sick time for every 25 hours

worked. The accrual balances for paid personal and sick time could also be listed on paystubs so that workers are aware of how many personal and sick days they have before requesting time off.

The second concern we have about the paid personal time bill is that it enables employers in the restaurant and other tipped industries to pay tipped workers the lower tipped minimum wage rather than the full minimum wage as required under the existing paid sick days law. CSS is on record with the New York State Department of Labor as a supporter of tipped workers receiving the full minimum wage with tips on top, given that tipped workers are much more likely than non-tipped employees covered under the full minimum wage to depend on public benefits and to suffer from material hardships. Our own polling data also shows that tipped workers disproportionately lack access to paid vacation days. We urge the City Council to correct the bill so that tipped workers are paid the full minimum wage for personal time and that the personal time pay rate for tipped workers is consistent with the sick time pay rate for these workers outlined under the existing paid sick time law.

CSS also urges the City Council to add a private right of action that would enable workers to vindicate their rights in court.

If enacted, New York would become the first U.S. state or city to require employers to provide paid vacation for their workers, although most of the world's wealthiest countries already do so. This is another opportunity for New York to move towards becoming a more equitable and progressive city. Low-wage workers are the ones who can least afford to go without paid leave but are those most likely to lack this benefit. All working New Yorkers need paid personal time to spend with their families, address necessary demands outside of work, and recharge from the daily grind. We urge the City Council to address the concerns we've highlighted here today and to approve the paid personal time off bill.



## FOOD INDUSTRY ALLIANCE OF NEW YORK STATE, INC.

130 Washington Avenue • Albany, NY 12210 • Tel (518) 434-1900 • Fax (518) 434-9962  
Government Relations (518) 434-8144

**Testimony by  
the Food Industry Alliance of New York State, Inc.  
in Opposition to  
Int. No. 800-A-2018**

Thank you for the opportunity to testify regarding Int. No. 800-A-2018. My name is Jay Peltz and I am the General Counsel and Senior Vice President of Government Relations for the Food Industry Alliance of New York State (FIA). FIA is a nonprofit trade association that advocates on behalf of grocery, drug and convenience stores throughout New York. Our members include chain and independent food retailers that account for a significant share of the city's retail food market and the grocery wholesalers that supply them.

Proposed language changes are highlighted in yellow.

Neighborhood grocers have never faced a more difficult operating environment. Food price inflation is minimal while operating expenses soar due partly to high rents and the \$15.00 minimum wage. Legislation that would authorize the issuance of up to 4,450 new food vending permits and mandate the establishment of twenty single carter zones for the collection of solid waste will, if passed and signed into law, reduce sales and increase costs further. Accordingly, regulatory burdens are squeezing neighborhood grocers while nontraditional retailers (that are largely nonunion operators) such as internet sellers, warehouse clubs, natural/organics retailers and dollar stores are taking market share from neighborhood grocers.

These circumstances are making it increasingly difficult for neighborhood grocers to net even a penny on the dollar. Traditional grocers have shut their doors while food deserts are present throughout the city. Unfortunately, the highly disruptive nature of this legislation will likely result in more, rather than fewer, food deserts in the city.

The costs of this bill will be substantial. The Washington Examiner has provided an analysis (copy attached) of the projected cost of the proposal: "De Blasio estimates his plan would affect 500,000 workers in the city. Government statistics say the average hourly salary is about \$42 for the mid-Atlantic region, and applying that figure to eight-hour shifts for 10 working days would yield a cost of \$1.67 billion (emphasis added)."

Clearly, the city's neighborhood grocers cannot afford such a mandate. Accordingly, to ensure that these small businesses remain viable and can make payroll, we respectfully request that businesses with fewer than fifty employees be exempt from the paid personal time off provisions of the bill.

In addition, grocery stores' busiest season is from mid-November through January 1. The significant use of paid personal time off during this season would undermine the viability of neighborhood grocery stores. However, the provisions of proposed section 20-914(c)(3) regarding the denial of a request for paid personal time off, combined with expanded provisions prohibiting retaliation, make it likely that a significant number of employees will take paid time off during the holidays, when people prefer to be home with their families or away on vacation rather than working. To avoid this outcome, we respectfully request that section 20-914(c)(3) be deleted in its entirety and be replaced with a negotiated framework that better balances the interests of employers and employees.

While employers can require notice under the circumstances described in section 20-914(c)(1)(2)(3), there are no provisions under the bill authorizing enforcement in the event workers violate their obligations under such section. As a result, compliance with such notice requirements will likely be minimal. Since this would be highly disruptive to employers and the benefits under the legislation should only be made available to employees who act in good faith, we respectfully request that the proposed local law be revised to authorize enforcement of violations by employees of the notice requirements in section 20-914(c)(1)(2)(3).

Finally, when the safe/sick time law was enacted in 2013 and amended in 2014, the effective date clause contained language intended to avoid disrupting workplaces subject to collective bargaining agreements. In addition, employers cannot adopt written policies concerning requests for paid personal time off until DCA adopts a rule and posts guidance. 120 days is not enough time for this to occur.

Accordingly, we respectfully request that the effective date bill section be revised as follows: "This local law takes effect 270 days after it becomes law, provided that in the case of employees covered by a valid collective bargaining agreement in effect on such date, this local law shall take effect on the date of the termination of such agreement, and provided further that prior to such date, the commissioner of the department of consumer affairs may take such measures as are necessary for its implementation, including the promulgation of rules, prior to such effective date."

We respectfully request that Int. No. 800-A-2018 be held in committee while the foregoing issues are discussed.

Respectfully submitted,

**Food Industry Alliance of New York State, Inc.**

**Jay M. Peltz**

**General Counsel and Vice President of Government Relations**

**Metro Office: 914-833-1002 | [jay@fiany.com](mailto:jay@fiany.com)**

**May 28, 2019**

# New York's paid vacation law could cost companies \$1.6 billion a year

by James Langford | March 05, 2019 05:23 PM

New York City's small businesses, hit by a \$15 minimum wage in 2018, are now being threatened with a proposal to guarantee workers 10 days of paid vacation that could cost up to \$1.6 billion per year.

Mayor Bill de Blasio's plan is meant as a quality-of-life measure for the hundreds of thousands of workers who aren't guaranteed paid time off. But companies say the cost of it would land on them, forcing reductions in work hours or even layoffs.

"The weight of all these burdens falls on small businesses," Kathryn Wylde, president of the nonprofit Partnership for New York City, told the *Washington Examiner*. "Very often, small business owners don't take vacations themselves because they can't afford to, so it's just grossly unfair."

De Blasio estimates his plan would affect 500,000 workers in the city. Government statistics say the average hourly salary is about \$42 for the mid-Atlantic region, and applying that figure to eight-hour shifts for 10 working days would yield a cost of \$1.67 billion.

To put the numbers in context, the vacation plan would cost a business with 10 employees making \$20 an hour an extra \$16,000 a year, said Rachel Greszler, a research fellow at the conservative Heritage Foundation. If the hypothetical company's profit margin were 2 percent, it would have to generate an extra \$800,000 a year just to pay off the cost of the new mandate, she said.

"It's probably nearly impossible to come up with that," she added. "I don't think the people who proposed this and are advocating it have really thought through, on a more personal level, about small employers and how this will actually impact them."

De Blasio's proposal, which will be sponsored in the 51-member City Council by council member Jumaane Williams, has yet to be introduced, though the Democratic mayor hopes to enact it as soon as possible. Modest by comparison with a [European Union law](#) guaranteeing at least four weeks of vacation and [British law](#) promising at

While New York's law would have little effect on large corporate employers and Wall Street firms, most of which already provide paid time off for workers, de Blasio said it cuts across a range of pay levels, from new hires to people earning \$100,000 a year or more.

"Almost one-third of all full-time workers and three-fourths of part-time workers don't have the kind of time we're talking about here," the mayor said in a news conference on his plan. "There are so many New Yorkers who have either no time off or not enough time off that they're barely keeping it together. They miss school plays, they miss weddings, they miss family occasions, they miss funerals, they miss all the things that make life whole."

Despite the opposition de Blasio expects from businesses arguing that mandatory personal time will damage the city's economy, the mayor said such legislation has worked well in other industrialized countries.

"Get used to the criticism; you're going to hear it a lot," he added. "We heard it when we did paid sick leave. We heard it when we did minimum wage, every time we raised the minimum wage."

The traction that such initiatives gained around the country may signal that paid-vacation initiatives will also spread — perhaps as high as the federal level, according to Wayne Outten, the founding partner of Outten & Golden and president of Workplace Fairness, a nonprofit group that advocates for employee rights.

"This would probably be just the start of something if New York City does go ahead and implement this," agreed the Heritage Foundation's Greszler. "They're an example for other cities, and there's almost a race-to-the-top competition when you look at cities like San Francisco and New York City to see who can provide what they would call stronger labor protections."

Given de Blasio's presidential ambitions, she added, "it's going to be something where others are going to pick up and say, 'If New York is doing this, then we have to do it, too.'"

Another pressure point may be that the U.S. lags behind most other industrialized Western nations on paid leave. Among the reasons is the relative weakness of the country's unions, Outten said. While organized labor won the passage of U.S. laws guaranteeing a 40-hour work week and a minimum wage during the early 20th century, its strength has dissipated in the decades since.

About one-third of U.S. workers were union members in 1955, when the American Federation of Labor and the Congress of Industrial Organizations merged, and the percentage shrank to 20 percent in 1983 and 10 percent as of last year, according to the U.S. Bureau of Labor Statistics.

"There's a greater sense in the U.S., unfortunately, that capital is more important than labor, that the owners of businesses should be able to call the shots and workers are more like cogs in the machine," Outten said.

The danger of the latest proposal to rebalance that relationship, however, is that city leaders fail to realize the cost of their plan is compounded by a variety of other requirements, explained Wylde, whose organization was formed in the 2002 merger of the New York City Chamber of Commerce and Industry and the New York City Partnership. The plan is likely to affect the smallest businesses the most, since they're the least likely to have the cash flow needed.

Businesses with just one owner who includes income on a personal filing may be hit particularly hard, since a GOP tax bill that cut the top rate for the largest U.S. companies also capped the amount of state and local taxes for which individuals can claim a deduction, Wylde added. New York residents pay a maximum rate of 3.8 percent to the city and 8.8 percent to the state, but were able to deduct the total amounts from taxable income reported to the U.S. Internal Revenue Service until 2018. Now, they can only deduct \$10,000.

"Unfortunately, the legislators never seem to add up their wish list in terms of what it's going to cost when you put it all together," she said. "Each item will be considered as, 'Well, it's a small item and they can certainly do it,'" without evaluating the "cumulative impact of the past five years of legislators competing to see who can extract the most from business."

Small business owners are unlikely to contest the city's action publicly, she added, especially given a hostile reaction from some local officials that prompted Amazon — one of the largest U.S. companies, with a market value approaching \$1 trillion — to abandon plans to locate an office complex employing 25,000 people in the city.

"It's disheartening for the business community, which has fought hard to bring New York back from the doldrums of the urban crisis of the '70s and '80s, to find there's really no appreciation for what it takes to build a business in this city at the city council level," Wylde said.



National Association of Theatre Owners • New York State

311 West 43rd Street, Suite 301, New York, NY 10036 • 212-493-4097

New York City Council Committee on Civil Service and Labor

INT-0800A-2018 – Requiring city employees to provide earned safe, sick, and personal time to employees

- Good afternoon, Chairman Miller and members of the committee. My name is Matthew Grelle, and I am an attorney and lobbyist, here on behalf of one of my clients, NATO, Theatre Owners of New York State.
- This is not the NATO that continues to defend the post war order in Europe, but rather the not-for-profit trade association representing movie theatres.
- In New York City, NATO represents 37 movie theatres, 312 screens, and 1,800 employees across the 5 boroughs.
- Despite the well-intentioned reasons behind INT-800-A, NATO opposes the bill because it provides yet another costly, and unfunded mandate upon businesses.
- The movie theatre business model is based on ensuring that theatre employees are safe, healthy and happy, because that is good for business.
- They remain employees, and do not require the expense of new training.
- If an employee is sick, or fears for their safety, they call their manager, and they stay home without fear of losing their job.
- Prior to the mandate of paid sick or safe time, the standard industry practice held that theatres did not fire an employee for being sick or facing a safety issue.
- Theatre employees are mostly comprised of part-time students, or retirees, because our flexible working schedule fits their needs.
- Approximately 80% of these employees are seasonal, as they work the summer blockbuster season or the winter holiday season.
- Theatres comply with the paid sick law by tracking each of the short-term employees from day one for accrual and usage purposes.
- Adding in additional tracking for paid vacation will likely require a system upgrade, which may not seem like much, but it is still an additional expense.

May 28, 2019

(917) 345-0005 | [matt@mattgreller.com](mailto:matt@mattgreller.com)  
[www.mattgreller.com](http://www.mattgreller.com)



National Association of Theatre Owners • New York State

311 West 43rd Street, Suite 301, New York, NY 10036 • 212-493-4097

- Theatres, other food service establishments, and businesses absorbed the additional cost of providing 40 hours of paid sick time in 2014.
- Some froze hiring, which led to greater adoption of automation. Others chose to increase prices. Some chose to cut salaries, hours or benefits for existing employees.
- They did not base decisions on the intentions behind, or necessity of, paid sick time.
- They were business decisions based upon the ability to absorb the additional costs.
- Now, just five years later, all of these businesses are being asked to continue to provide their 40 hours of paid sick or safe time, AND an additional 80 hours of paid time off.
- Essentially, every employee will receive a total of 120 hours of paid time off.
- Again, businesses will absorb the additional cost in one of three ways: higher prices, hiring freezes, or cutting salaries or benefits.
- We do not want to pursue any of these options.
- To be clear: we are not opposed to the concept of paid time off, but we are opposed to legislatively mandated paid time off.
- What about creating jobs, instead of creating administrative burdens and costly mandates for the jobs that are already here?
- Also, why aren't there any exemptions in this legislation?
- In other jurisdictions, some PTO policies exempt: students; independent contractors; certain health care workers; tipped employees; seasonal workers; temporary workers; employees paid by commission, and also provide a hardship exemption.
- This bill only exempts businesses with fewer than 5 employees, but even they must still provide 80 hours, or 10 unpaid vacation days to their employees.
- This is a big disincentive for businesses to hire that 6<sup>th</sup> employee.
- Furthermore, any existing policy must have the same accrual requirements, and provide leave for the same purposes and for the same conditions.

May 28, 2019

(917) 345-0005 | [matt@mattgreller.com](mailto:matt@mattgreller.com)  
[www.mattgreller.com](http://www.mattgreller.com)



National Association of Theatre Owners • New York State

311 West 43rd Street, Suite 301, New York, NY 10036 • 212-493-4097

- So, if a business gives a standard two-week bucket policy – of personal, vacation, safe and sick days – and it's not accrued the same way, or for the same reasons and conditions – the business would still have to add 5 more paid time off days.
- That's right. Employers that provide two-week bucket policies would still have to add a third week so that they can meet the 120 hours of paid leave.
- If the point is to provide paid vacation days to employees who don't have any, then there should not be interference with any existing leave policies that could be used for vacation days.
- This situation is made worse with the accrual starting on day 1, unlike San Francisco, which allows the paid sick leave accrual to begin on day 90.
- The first version of the enacted 2014 paid sick leave law allowed usage to begin on day 120, to help businesses that have many seasonal employees, but it is now 90 days.
- For the theatre industry, and others, college students returning home for the summer typically work between Memorial Day and Labor Day, and then return to college.
- They would begin to accrue PTO on day one in late May, and once back at campus in the Fall, after 90 days of working, they could then begin their two-week paid vacation.
- How is providing paid vacation time to employees who are no longer working good public policy?
- A better approach would start accrual on day 90, and allow usage on day 120.
- That would provide clarity and simplicity, follow other benefit policies, and prevent seasonal employees from using paid time off when they are no longer actively employed.
- Lastly, the amended penalties section is very broad and well beyond the penalties of the original paid sick and safe leave penalties.
- We respectfully urge the committee to carefully amend this legislation to promote small business growth, job protection and job creation.
- I thank you for the opportunity to testify, and look forward to answering your questions.

May 28, 2019

(917) 345-0005 | [matt@mattgreller.com](mailto:matt@mattgreller.com)  
[www.mattgreller.com](http://www.mattgreller.com)



## Testimony of Kyle Bragg

Secretary Treasurer, SEIU 32BJ

Committee on Civil Service and Labor

Int. 0800-2018: Requiring city employers to provide earned safe, sick and personal time to employees.

May 28, 2019

Good morning Chairperson Miller and Committee Members. My name is Kyle Bragg, I'm the Secretary Treasurer of SEIU 32BJ. Thank you for the opportunity to testify here today on behalf of the Union's 90,000 plus New York City members.

This groundbreaking policy will make a meaningful difference in the lives of half a million workers in New York City who currently do not have paid personal leave from their job.<sup>i</sup> 10 days personal leave will mean more workers having time to rest and recuperate, more workers having time to spend with, and care for, their family members, and more workers living happy and healthy lives.

This policy reflects the values our members fights for and the kind of City we want to live in. Workers in the industries we represent are among those who will benefit from this bill's passage.

Passing this bill will be another significant step forward for airport workers who have bravely fought over recent years to organize and raise standards on their jobs. Until recently workers like baggage and cargo handlers, cabin and terminal cleaners, security officers and wheel chair attendants were making the minimum wage or little more. These workers are employed by service contractors who compete against each other for work from airline and terminal clients. Without a level playing field, this competitive low-bid environment that leads to a race to bottom that undermines the quality of jobs.

We strongly support the creation of a minimum standard through this legislation that will ensure all workers have access to paid personal leave. To guarantee this bill is passed in the fairest and most effective way possible we urge the committee to address three crucial issues:

- A private right of action for workers to pursue violations of the law;
- Protections for tipped workers; and
- An accrual rate that enables workers to access the promised 10 days leave

A private right of action can play a hugely important role in the enforcement of workplace rights as it enables workers to pursue claims separate to the actions of the responsible government agency. While it is vital to have well-resourced and active agency enforcement, often their strategic priorities do not align with individual matters being acted upon with the timeliness and urgency they may require. Airport workers at JFK for example are currently fighting to enforce their sick pay rights. DCA is investigating a number of their complaints. A private right of action will provide an additional necessary tool for enforcement of the right to paid



SERVICE EMPLOYEES  
INTERNATIONAL UNION  
CTW, CLC

HÉCTOR J. FIGUEROA  
President

LARRY ENGELSTEIN  
Executive Vice President

KYLE BRAGG  
Secretary Treasurer

LENORE FRIEDLAENDER  
Assistant to the President

VICE PRESIDENTS

SHIRLEY ALDEBOL

KEVIN BROWN

JAIMIE CONTRERAS

JUAN HERNANDEZ

ROB HILL

ALISON HIRSH

DENIS JOHNSTON

GABE MORGAN

MANNY PASTREICH

ROXANA RIVERA

JOHN SANTOS

JOHN THACKER

Capital Area District

Washington 202.387.3211

Baltimore 410.244.6299

Virginia 202.387.3211

Connecticut District

Hartford 860.560.8674

Stamford 203.674.9965

District 1201

215.923.5488

Florida District

305.672.7071

Hudson Valley District

914.328.3492

Mid-Atlantic District

215.226.3600

National Conference of

Firemen and Oilers

606.324.3445

New England District 615

617.523.6150

New Jersey District

973.824.3225

Western Pennsylvania District

412.471.0690

[www.seiu32bj.org](http://www.seiu32bj.org)

leave. Other laws enforced by the Department of Consumer and Worker Protection, including the Fair Workweek Law, the Freelance Isn't Free Act and Displaced Worker Protection, enable a private right of action. We ask that the Earned Safe and Sick Time Act, which is to be amended by this bill to include personal time, is updated to remove this anomaly.

Last fall, airport workers won a minimum wage policy issued by the Port Authority of New York and New Jersey, which will put them on a path to \$19 an hour by 2023. Some airport workers – specifically sky caps and wheelchair workers – are tipped workers. In order for the right to paid leave to be meaningful, tipped workers must be entitled to receive paid leave at no less than their regular rate of compensation. In any event, that must be no less than the full applicable hourly minimum wage – without allowances for tips. While the current Earned Sick and Safe Time Act includes specific language ensuring that all workers – tipped and non-tipped – receive no less than the full State statutory minimum wage rate, that clarification is missing from the proposed amended language. We ask that the language of the bill be amended to address this concern and ensure that tipped workers are paid no less than the highest applicable rate, without allowances for tips, under applicable federal, state or local law, or policy established by the Port Authority, for both safe/sick time and personal time.

Finally, we ask that this bill be amended to see that it delivers on the promise of providing two weeks or 10 days of paid personal leave. This was the bar that was set when 32BJ members filled the stair case of this building in January support of the policy being announced.<sup>ii</sup> 10 days is far behind standards set in other countries<sup>iii</sup> and less than what is enjoyed by many workers in the City; but it is strong start for what will be a first in nation bill. We cannot settle for less. The current accrual rate of one hour per 30 hours worked will leave a full time worker with less than 70 hours of personal time after 52 weeks. This is a both a matter of math and a matter of fairness. The accrual rate for personal time needs to be amended to 1 hour for every 26 hours worked in order to deliver on the bill's promise.

I wish to again thank Committee Members for your time this morning and for your consideration of these matters, and to the City Council for its leadership on worker rights issues. On behalf of the Union I offer our full assistance to resolve the outstanding matters in the proposed language and we look forward to celebrating New York City taking another step towards ensuring all workers can live with the dignity and respect they deserve.

---

<sup>i</sup> Coverage of Half a Million Workers, see <https://www.politico.com/states/new-york/albany/story/2019/01/09/de-blasio-city-will-mandate-paid-time-off-for-all-workers-782443>

<sup>ii</sup> Commitment to 10 days, see above link.

<sup>iii</sup> International standards, see [https://www.ilo.org/wcmsp5/groups/public/---ed\\_protect/---protrav/---travail/documents/publication/wcms\\_235155.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---travail/documents/publication/wcms_235155.pdf) (page 16)



TESTIMONY

**Testimony of Paul K. Sonn**  
National Employment Law Project

**In Support of Int. 800-A  
Guaranteeing Paid Time Off for  
All Working New Yorkers**

---

**Hearing before the New York City Council**  
Committees on Civil Service and Labor  
City Hall  
New York, New York

May 28, 2019

---

**Paul K. Sonn**  
State Policy Program Director

---

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

(646) 693-8215  
[psonn@nelp.org](mailto:psonn@nelp.org)

Good morning, and thank you to the Committee and to the Public Advocate for the opportunity to testify on Intro 800-A, which would amend New York City's Earned Safe & Sick Time law to give all New York's workers the right to earn paid personal or vacation time off from work. My name is Paul Sonn, and I am the state policy program director at the National Employment Law Project (NELP). NELP is a national research and advocacy organization, headquartered in New York City, that works with federal, state and local policymakers on a wide variety of workforce issues. We have been pleased to work with New York City on a variety of initiatives in recent years ranging from fair chance employment to living wages.

NELP applauds the City Council, the Public Advocate and Mayor de Blasio for their leadership on this important issue of paid time off. We testify in enthusiastic support of Int. 800-A. If adopted, Int. 800-A would make New York City the first city in the nation to guarantee that all workers have access to paid time off to meet some of the basic needs that all of us face in our daily lives. It would reflect a long overdue first step toward bringing the U.S. into line with other industrialized nations, virtually all of which guarantee workers paid time off.

At the same time, there are a few very significant shortcomings with the bill as currently proposed that we would respectfully urge be remedied before it is adopted. Most significantly, it is crucial that the bill – and New York City's Earned Safe & Sick Time Act off of which it builds – be amended to add a private right of action. The omission of the private right of action in the Safe & Sick Time Act has impeded efficient enforcement of the existing law, and is far out of step with other more recent New York City workers' rights measures, and with paid sick time laws adopted by most other U.S. cities. We would urge the Council to add this crucial missing element, and the other fixes that we identify in this testimony, and then proceed to adopt this historic legislation.

### **I. Too Many Workers in New York and Nationally Don't Receive Any Paid Time Off; Int. 800-A Would Fix That and Set a New Standard for Other Cities and States**

U.S. workers are more productive than ever – but aren't seeing the benefits. Instead they're working longer hours and too many can't afford to take time off for basic life and family needs. Among comparable industrialized countries, the U.S. is virtually alone in not guaranteeing all employees paid time off for vacation or family needs. At least 20 comparable countries -- including less affluent countries such as Greece, Ireland and New Zealand – already mandate that private firms offer at least ten days of paid vacation (and, in fact, the overwhelming majority require twenty or more days), making America a rare outlier in having no standards in this area.<sup>1</sup>

As a result, according to data from the City's Department of Consumer and Worker Protection, 60% of low-income workers in New York City such as fast food workers do not receive any paid personal or vacation days. Even among middle-income workers a surprising portion – 33% – do not receive paid time off. And 67% of part-time workers – a vast segment of the workforce – do not receive it.<sup>2</sup>

The human and financial cost for these workers is profound. Without paid time off, thousands of working New Yorkers are forced to choose between missing badly needed days or hours of pay and being able to make time for personal needs and life events – everything from a child's parent-teacher conference to the funeral of a loved one to a family vacation or religious observance.

The historic push reflected in Int. 800-A would finally ensure that all New Yorkers are able to earn paid time off – as workers in virtually every other industrialized country do. Building off of the familiar framework of the city's Earned Safe & Sick Time law, Int. 800-A would enable full time workers to accrue ten days of paid time off each year – and crucially would include part-time

workers, although they would appropriately accrue it at a slower rate in proportion to their shorter hours.

You will no doubt hear this morning from segments of the employer community arguing that it is just too much to ask them to provide paid time off. Some will likely cite the economic squeeze facing small businesses in the city as commercial rents and other operating costs rise. Others will cite the other important city and state labor standards that have adopted in recent years as a reason for the city council to go slow on paid time off.

However, the reality is that providing ten paid days off each year is a very modest, reasonable standard. The fact that businesses employing 81% of full-time workers and 33% of part-time workers in the city already provide paid time off shows that it is economically realistic to do so, even for employers of low-wage and part-time workers.<sup>3</sup>

## **II. However, Several Key Problems with Int. 800-A Need to Be Addressed**

While NELP enthusiastically supports Int. 800-A, there are several key problems with the current bill that we would strongly urge the Committee and Public Advocate to remedy. Without these fixes, we are deeply concerned that the bill will not achieve our shared goal of making paid time off a reality for working New Yorkers.

Specifically, the bill should be amended (1) to include a private right of action so that workers can vindicate their rights in court; (2) to make clear that workers should be compensated for paid time off at their regular rate of pay and in any event no less than the highest applicable minimum – including applicable minimum wages that are higher than New York State's minimum wage, such as the Port Authority's higher minimum wage for airport workers; (3) to guarantee that tipped workers receive no less than the full minimum wage – not the lower tipped minimum wage – when taking paid time off; and (4) to revise the accrual rate for personal time to ensure that, at the very least, full time workers can in fact accrue 80 hours of personal time each year. Specifically, we strongly urge the City Council to adopt the proposed language changes detailed in the testimony offered by A Better Balance to correct these serious problems with the bill.

### **A. Int. 800-A Must Include a Private Right of Action.**

The first very serious omission is the absence of a private right of action to give workers whose employers refuse to follow the law the option of vindicating their rights in court. The absence of a private right of action means that the law can be enforced only by the Department of Consumer and Worker Protection through its Office of Labor Policy & Standards.

The absence of a private right of action under Int. 800-A stems from the fact that the city's Earned Safe and Sick Time law included no private right of action, and Int. 800-A is structured as an expansion of the earlier law. As capable and effective as the Office of Labor Policy & Standards is, it cannot do the job alone. It simply does not have the bandwidth to comprehensively enforce the Earned Safe and Sick Times Law and Int. 800-A across New York City's vast work force.

Government labor standards enforcement capacity has always been limited and underfunded. That's why our enforcement system at the federal, state and local levels has always depended critically on a public-private combination where government enforcement is complemented by private enforcement in the courts brought by workers themselves represented by legal aid lawyers or the workers' employment bar.

As NELP's Patricia Smith – who served as the U.S. Solicitor of Labor in the Obama Administration, and before that as New York State Labor Commissioner and Chief of the New York State Attorney General's Labor Bureau – has explained:

I can speak firsthand from my work leading multiple government labor standards enforcement agencies that as committed and talented as the staff are, they are overburdened and underfunded, and by themselves simply cannot meet the enforcement challenge. In fact, our enforcement system has always depended on workers being able to step in to enforce their own rights and many of these laws provide for attorneys' fees to incentivize this type of worker enforcement. As a result, historically workers have initiated the vast majority of employment related lawsuits without the government's involvement.

Thus, a labor standards law that does not include a private right of action to permit private enforcement will inherently be weak and suffer from under-enforcement and poor compliance. Moreover, the failure to provide a private right of action prevents workers who have been cheated under multiple labor laws such as the minimum wage, Earned Sick Time and Int. 800-A from efficiently adjudicating all of those issues in a single enforcement action. Instead, they are forced to bring multiple enforcement actions in multiple fora, driving up the cost, exacerbating delays, and making enforcement less realistic.

The omission of the private right of action from New York City's Earned Safe and Sick Time law is out of step with the city's contemporary practice and the practices of other comparable cities. Over two-thirds of the nearly three-dozen paid sick time laws in the U.S. include a private right of action, including Westchester County's law. Similarly, most of the labor standards laws enacted in recent years by the City Council – for example, the city's Fair Workweek Law, its Fast Food Deductions Law and its ban on asking job applicants about their salary history – all include private rights of action.

The omission of the private right of action from the Earned Safe and Sick Time law was an artifact of a more conservative era in New York City politics. When activists including A Better Balance, SEIU 32BJ, Make the Road New York, and Working Families campaigned for its enactment in 2013, Michael Bloomberg was Mayor and Christine Quinn was City Council Speaker. Mayor Bloomberg made clear his intent to veto the measure. And Speaker Quinn, who was running for mayor at the time as a business-friendly candidate, insisted on stripping out the private right of action as a condition of passing the law and overriding Mayor Bloomberg's veto.

If the Earned Safe and Sick Time Law were being proposed for the first time today, it is inconceivable that it would not include a private right of action. Enacting Int. 800-A without remedying that glaring omission would be deeply unfortunate.

#### **B. Int. 800-A Must Ensure That Workers Covered by Higher Labor Standards Are Paid at That Level for Their Personal Time**

Since the passage of the city's Earned Safe and Sick Time law, not only has New York State's minimum wage increased to \$15 an hour in New York city, but other new wage standards have been adopted such as the Port Authority's higher minimum wage for employees who work at Port Authority airports. Int. 800-A should be amended to make clear that workers should be compensated for paid time off at their regular rate of pay and in any event no less than the highest applicable minimum – including minimum wages that are higher than New York State's minimum wage, such as the Port Authority's airport worker minimum wage. And this standard that workers should be compensated at their regular rate of pay, and no less than the highest applicable

minimum wage, should apply equally to both paid sick time and paid personal time under Int. 800-A.

**C. Int. 800-A Rolls Back the Rights of Tipped Workers & Does Not Make Clear That They Must Be Paid at Least the Full Minimum Wage for Their Personal Time**

Another problem is that the proposed legislation rolls back the rights of tipped workers—including restaurant workers, car wash workers, nail salon workers and airport workers—by requiring that employers pay tipped workers only the tipped minimum wage rather than the full minimum wage as the existing Earned Safe and Sick Time law has always provided, and as other jurisdictions' sick and safe time laws around the country provide.

Specifically, the bill *removes existing language* in the city's Earned Safe and Sick Time law providing that "in no case shall the paid safe/sick time hourly rate be less than the hourly rate provided in subdivision of section 652 of the labor law [the full minimum wage]."<sup>4</sup> This language was intended to ensure that tipped workers receive the full minimum wage when they take sick or safe leave because the tipped minimum wage is appropriate only if the worker gets tips; the need to take sick or safe leave necessarily means the worker will not be making tips. Without the right to earn at least the full minimum wage, tipped workers may be discouraged from taking sick or safe leave when they need to and come to work sick, or come to work rather than seeking safety.

This rollback, which we assume is unintentional, is deeply inappropriate. It would weaken the city's existing Earned Safe and Sick Time Law and make Int. 800-A's new paid personal time protections so meager for tipped workers that many could not realistically afford to use the paid days.

Already, tipped workers taking Earned Safe and Sick Time or soon personal days face losing their tip income for those days – a significant financial loss. Allowing them to be paid the subminimum wage on top of that would make these protections meaningless and as a practical matter would prevent many tipped workers from availing themselves of these authorized personal days.

We therefore strongly urge that the language proposed for deletion be restored in order to ensure that employers pay tipped workers at least the full minimum wage for their personal days and earned safe and Sick Time.

**D. Int. 800-A Must Be Amended to Ensure the Accrual Rate Guarantees Workers Can Earn 80 Hours of Paid Personal Time Per Year**

The stated purpose of Int. 800-A is to ensure that full-time workers can accrue ten days or 80 hours of paid personal time per year. However, as drafted, the legislation would not achieve that aim. Int. 800-A provides that workers will earn one hour of personal time for every 30 hours worked. Full time workers who take ten personal days a year can be expected to work approximately 2,000 hours. They would thus need to accrue an hour of personal time for every 25 hours worked – not 30 hours – in order to be able to reach that 80 hour/ten day level each year. We therefore strongly urged that the accrual formula be adjusted to reflect one hour of paid time off for each 25 hours worked.

### **III. Conclusion**

Int. 800-A is a path-breaking measure. New York City can and should be a leader in the movement to ensure all workers have the time they need to both thrive in the workplace and at home, and this bill would achieve that aim. That said, we must ensure that in this pursuit, the Council and Public Advocate do not simultaneously roll back or limit the rights of workers, especially low-wage workers, and their ability to fully exercise their rights under the law. We respectfully urge the Council and Public Advocate to incorporate the amendments outlined in this testimony and that of A Better Balance and SEIU 32BJ, and to then move swiftly to adopt this important measure. Thank you very much for the opportunity to submit this testimony.

---

<sup>1</sup> Rebecca Ray, Milla Sanes & John Schmitt, No-Vacation Nation Revisited, Center for Economic and Policy Research (2013), available at <http://cepr.net/publications/reports/no-vacation-nation-2013>

<sup>2</sup> New York City Dep't of Consumer and Worker Protection / Office of Labor Policy and Standards estimate (May 2019).

<sup>3</sup> Ibid.

<sup>4</sup> See proposed Int. 800-A, § 20-912 (definition of “Paid safe/sick time”).



Rosa Squillacote's testimony delivered to the  
New York City Council  
Regarding Proposed Int. No. 800-A  
**EARNED SAFE, SICK AND PERSONAL  
TIME LAW ACT**

May 28, 2019

Good morning, my name is Rosa Squillacote and I am currently a domestic employer and here to share my enthusiastic support for the Paid Personal Time legislation being proposed. I especially want to share how important it is that domestic workers are extended this benefit. I have employed Luisa, a member of the worker-owned Nanny Bee Childcare Cooperative to care for my twin babies since September 2018. Luisa provides calm to the chaos. As a working mother this is invaluable to me.

I am also a member of Hand in Hand: The Domestic Employer Network (HiH). HiH is a national network of employers of nannies, house cleaners and home attendants, our families and allies. We believe that dignified and respectful working conditions benefit worker and employer alike. We envision a future where people live in caring communities that recognize all of our interdependence. To get there, we support employers to improve their employment practices, and to collaborate with workers to change cultural norms and public policies.

My wife and I gave birth to our babies very close in time. We were very lucky to take 6 months of maternity leave between both of our jobs, but once we had to go back to work we were faced with deciding what type of childcare would work best for our family. Regular daycare for two babies at the same time was simply unaffordable, and we found hiring a part-time nanny for 20-hours a week made much more sense for our needs. It also felt important to us that the childcare arrangement would allow for the provider to really get to know our twins, build a deep relationship with them, and take care of them in our home where they are most comfortable.

Nanny Bee Childcare Cooperative has been a great resource. The Cooperative has systems set up that ease the administrative burden on the employer, but also it ensures the worker-member is able to co-create the terms of the work agreements. In the beginning I worked with Luisa, and also the coordinator of the cooperative to put together a contract. It helped clearly lay out work duties, clarified the scope of cleaning

responsibilities (only for the babies and not general housecleaning), time off, and much more.

Luisa ensures that our babies are cared for physically and emotionally. Her work entails feeding them, putting them down for naps, watching them, and interacting with them to promote their development. Luisa has been an excellent employee and has developed a very caring relationship with our children. As a mom I don't understand why anyone would want to mistreat, underpay, or not extend benefits to someone caring for their children. In fact, nannies should be afforded a level of pay and benefits that ensure they can take care of themselves and their loved ones, which in turn means they are able to bring their best to caring for our children.

When it came to paid time off, Luisa and our family agreed on a set of federal holidays, 1 week of vacation, and dialogue as needed about negotiating time off between when our family is on vacation and when Luisa prefers her vacation. It feels powerful to me that we are able to have these conversations where the dynamic is more equalized -- I don't feel I am coercing Luisa and she is empowered to make decisions that work for her. I believe Luisa's membership in Nanny Bee and participation in the domestic worker movement makes this possible. If Paid Personal Time were to become law more domestic workers and employers could also come to these conversations grounded in a fair standard backed up by the city.

I want my domestic employment relationship to reflect my value in treating people respectfully no matter what. I know firsthand what it feels like to not be respected as a worker. I worked as a nanny in college for employers who were not respectful of my time, or didn't think of my work as real work. And even now, I work as an adjunct professor and I am drastically underpaid for the labor I provide to the academic institution. It would be irresponsible and hypocritical of me to not fully recognize the value of Luisa's work and treat her with the fairness and dignity she deserves.

Fairness and dignity means the conditions that allow us to be fully human beings, to be able to do things besides work and be sick. Luisa has family both here and in the Dominican Republic, and she is also continuing her education. I want her to be able to balance her job with showing up and honoring the other aspects of her life. She should have some time she can count on for decompressing and settling in to herself as well. When she is more fully herself, my family benefits too.



C. Lynch's testimony delivered to the

New York City Council

Regarding Proposed Int. No. 800-A

## EARNED SAFE, SICK AND PERSONAL TIME LAW ACT

May 28, 2019

Good morning. I live on the Upper West Side and, like most people in my orbit, rely on domestic workers to keep my home clean and take care of my young children. It is in that capacity - as a domestic employer - that I am here today to speak in support of paid personal time off for the women who work for my family.

But of course, I am not just an employer; I am a worker, too. I know that I do better work when I have the freedom to manage my time, to re-charge, to take care of my children when they are sick, and to attend important appointments. Paid personal time off is something I, with my college education and white-collar background, take for granted. How could I possibly deny it to those whose work makes my working possible?

Moreover, the women who work for my family ensure the wellbeing of my children. If my home feels happy, safe, and clean, it's because of them. If I can come home and play rather than folding laundry, it's because of them. **I owe the quality of my life to their care, and I want them to have the same quality of life, because our lives and families are equally valuable.**

Our workers currently get the equivalent of two weeks off, plus all major holidays. On a practical level, we work together to plan vacations, and our time off usually overlaps. It simply takes communication. But sometimes things come up: a gas leak; a death in the family; or, most recently, a wedding and subsequent honeymoon. Is it sometimes "inconvenient" to have to re-order my life to suit someone else's? Sure! But they do exactly the same for me *every other day*.

Most important, in valuing domestic work you are valuing women's work. By saying that domestic workers like nannies deserve personal time off, you are saying that the care work they do is real, it is hard, and it is as worthy of paid time off as any office job. As a mom, I say it's about time. When we start accepting that caregiving is legitimate, we start to make things more equitable for all. Thank you.

I am also a member leader of Hand in Hand, a national network of employers of nannies, house cleaners and home attendants, our families and allies. We believe that dignified and respectful working conditions benefit worker and employer alike. We envision a future where people live in caring communities that recognize all of our interdepen-

dence. To get there, we support employers to improve their employment practices, and to collaborate with workers to change cultural norms and public policies.

May 28<sup>th</sup>, 2019

NYC Council, Committee on Civil Service and Labor  
Comments of the NYC Hospitality Alliance  
Int. 800-A

My name is Andrew Rigue and I am the executive director of the New York City Hospitality Alliance, a not-for-profit association representing thousands of restaurants and nightlife establishments throughout the five boroughs that would be severely affected by Int. 800-A.'s mandate that employers provide up to two-weeks paid time off to all employees, in addition to the one-week paid leave they must already provide by law.

So, three weeks paid time off sounds great, but how is it being paid for? Is the City ponying up? Is the city enacting any long-needed, meaningful regulatory reforms to help small businesses offset the cost? No, it is small business owners and consumers who are being taxed by the city yet again.

The truth is that during a time when the restaurant industry is under a constant barrage of new costly mandates, with no meaningful financial offsets given, sweeping proposals like this put too many small business owners in an impossible position. Their margins are too small to again absorb the increased costs and their customers are too price sensitive for them to raise prices even more in response to each new mandate.

So where is the money coming from this time? Often, the very workers you are trying to help. A recent survey found that 77% of full-service restaurant respondents reduced employee hours, and 36% eliminated jobs in 2018. 75% of limited-service restaurant respondents report they will reduce employee hours, and 53% will eliminate jobs in 2019 as a result of mandates that have increased operating costs. Last year the city's full-service restaurant industry shed about 6,000 jobs and the troubling decline in jobs has continued in 2019. Others have just given up and closed their doors. All of this contributes to all the empty storefronts you see in your neighborhood. Now is clearly not the time for another expensive employer mandate.

This proposal will cost the hospitality industry double what it will cost to offer the benefit to most office workers. This is because unlike many office jobs where a person's work is waiting for them when they get back from paid time off, a restaurant must replace a line cook or waiter to work that shift. This proposal also poses particular challenges for restaurants, bars and clubs because they're at their busiest during nights, weekends and holidays, precisely the times when many workers will demand their paid vacation. The proposal will also interfere with the paid time off policies many businesses already offer and create more red tape to comply with the complicated record keeping requirements.

Those familiar with New York government know that espousing the virtues of small business is good politics, but unfortunately it rarely results in good policy for the businesses. New York City needs to take a vacation from implementing burdensome policies and should get to work passing policies that help businesses succeed and create good jobs.

Respectfully,

Andrew Rigue  
Executive Director  
[arigue@thenycalliance.org](mailto:arigue@thenycalliance.org)

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013  
**tel:** 212.430.5982  
[info@abetterbalance.org](mailto:info@abetterbalance.org)  
[abetterbalance.org](http://abetterbalance.org)

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
**tel:** 615.915.2417

**Testimony of A Better Balance: The Work & Family Legal Center  
Before the Committee on Civil Service on Labor on Proposed Intro 800-A**

May 28, 2019

Submitted By:

Sherry Leiwant, Co-Founder & Co-President  
Sarah Brafman, Staff Attorney  
Marcella Kocolatos, Staff Attorney

Good morning, and thank you to the Committee and to the Public Advocate for the opportunity to testify on Intro 800-A, which would amend the Earned Safe & Sick Leave Act to give workers the right to earn paid personal time off work, among other changes to the law. My name is Marcella Kocolatos, and I am a Staff Attorney at A Better Balance, a national non-profit legal advocacy organization based in New York City and dedicated to promoting fairness in the workplace and helping workers meet the conflicting demands of work and family.

Our organization was at the forefront of drafting and advocating for the New York City Earned Sick Time Act as well as the recent expansion of the law to include safe time and to broaden the definition of family members. Since the law's initial passage in 2013, we have conducted hundreds of trainings to educate New Yorkers about their rights under the law. Since the law's inception, we have also represented dozens of low-income workers who were denied sick time or retaliated against for asking for or using sick time, including over two dozen complaints before the Department of Consumer Affairs.

A Better Balance also provides legal and policy support to earned sick leave campaigns in cities and states throughout the nation and in Congress. We have drafted the majority of the nation's paid sick leave laws and helped draft the recently passed paid time off law in Maine, which is expected to be signed into law today.

## I. Providing Paid Personal Time Will Set a New Standard in the U.S.

Intro 800-A is by far the most groundbreaking expansion to the sick leave law proposed thus far. Before today, no jurisdiction in the United States—federal, state, or local—guaranteed workers any amount of personal time off work, paid or unpaid. Two weeks ago, Maine passed the first paid time off law giving workers the right to take time off for any personal reason. But Maine does not have a sick time law so the 40 hours of personal time off granted to workers for any reason must encompass any time they may need to address their own health needs or those of their family members, which may leave them with little time left, if any, to address non-medical needs. Under the proposed Intro 800-A, however, workers would have the right to earn and use paid personal time off work *in addition to* their right under the existing law to earn and use paid sick or safe time. Workers in New York City will therefore have dedicated time they can use for personal or family reasons within their own discretion. With the introduction of this bill, the Council has shown once again that New York City is a national leader in the movement to advance the rights and wellbeing of working families.

### A. The U.S. Is Lagging Behind Other Advanced Economies

In the global context, the United States is an outlier. We are the only advanced economy in the world that does not guarantee its workers any amount of paid vacation.<sup>1</sup> Without legal requirements, many employers fail to provide their employees with this basic benefit, even though doing so leads to higher productivity, stronger workplace morale, greater employee retention, and significant health benefits that benefit workers and employers alike.<sup>2</sup>

According to a 2013 report by the Center for Economic and Policy Research (CEPR), nearly one in four Americans has no paid vacation and no paid holidays.<sup>3</sup> According to government survey data analyzed by the CEPR, the average American worker in the

---

<sup>1</sup> REBECCA RAY, MILLA SANES & JOHN SCHMITT, CTR. FOR ECONOMIC AND POL'Y RESEARCH, NO-VACATION NATION REVISITED 1 (2013) [hereinafter NO-VACATION NATION], <http://cepr.net/documents/no-vacation-update-2014-04.pdf>.

<sup>2</sup> Tanya Mohn, *Take A Vacation: It's Good For Productivity And The Economy, According To A New Study*, FORBES (Feb. 28, 2014), <https://www.forbes.com/sites/tanyamohn/2014/02/28/take-a-vacation-its-good-for-productivity-and-the-economy-according-to-a-new-study/#349d9dc25a33>.

<sup>3</sup> NO-VACATION NATION at 1.

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013  
tel: 212.430.5982

info@abetterbalance.org  
abetterbalance.org

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
tel: 615.915.2417

private sector receives only about 10 days of paid vacation from his or her employer and about 6 paid holidays per year.<sup>4</sup> Neither the paid vacation time for those workers lucky enough to have it nor the paid holidays are guaranteed by law, however.<sup>5</sup> Because there is no legal entitlement to that time, there is no protection if an employer wishes to retaliate against the worker for using it. Furthermore, this average amount of vacation time is less than the minimum legal standard set in the rest of the world's most prosperous economies (other than Japan, which guarantees exactly 10 paid vacation days).<sup>6</sup>

Indeed, of the 21 wealthy countries studied in the report, only Canada guarantees as few as 10 paid vacation days.<sup>7</sup> Unlike Japan, however, Canada also mandates an additional 9 paid holidays.<sup>8</sup> The remaining 19 countries studied provide at least 20 paid vacation days and most also provide additional paid holidays.<sup>9</sup> Member countries of the European Union are required to provide at least 20 paid vacation days, but some exceed that floor, including France, which provides 30 paid vacation days, and the United Kingdom, which provides 28.<sup>10</sup>

It is clear that the United States is woefully out of step with *all* of its peers with respect to this issue. Unsurprisingly, the paid vacation and paid holidays that U.S. employers *do* make available voluntarily are distributed unequally.<sup>11</sup> Most low-wage and part-time employees do not have access to these benefits. Only 49 percent of low-wage workers, defined as the bottom fourth of earners, have paid vacation, compared to 90 percent of high-wage workers, defined as the top fourth of earners.<sup>12</sup> Only 35 percent of part-time workers have paid vacation compared to 91 percent of full-time workers.<sup>13</sup> Small-business employees are also less likely to have paid vacation time than employees of medium-size or large establishments. Only 69 percent of small-business employees—

---

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at 45.

<sup>6</sup> *Id.* at 1.

<sup>7</sup> *Id.* at 2.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at 1.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013  
tel: 212.430.5982

info@abetterbalance.org  
abetterbalance.org

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
tel: 615.915.2417

defined as employees in establishments with 1-99 workers—have paid vacation compared to 86% of workers in larger businesses.<sup>14</sup>

### **B. Intro 800-A Will Begin to Bring New York City Into Line With Our Global Counterparts**

Intro 800-A accounts for the unequal distribution of paid vacation time by ensuring that *all* employees, whether full-time or part-time, have the ability to earn personal time off from work separate from earned sick and safe time. The bill also requires that all but the smallest employers provide *paid* personal time off to their employees. This is essential because without pay, low-wage workers in particular, who depend on every dollar they earn to make ends meet, could not afford to take the time they earn. The bill also makes clear that retaliating against employees because they use or request to use earned personal time is illegal. This is another essential component of the legislation that we applaud. Many workers are afraid to request time off from work, even for medical or other emergencies, due to fear of retaliation. This law will give recourse to workers who are terminated or experience other adverse actions as a result of exercising their rights.

### **C. Intro 800-A Will Promote the Health and Wellbeing of New Yorkers, As Well As the Strength of Our Economy**

By passing this bill, the Council will undoubtedly improve the lives and wellbeing of millions of New Yorkers. Presently, New Yorkers enjoy the rights to paid sick and safe leave and to paid family leave. New York City workers also have a limited right to a temporary schedule change for certain qualifying personal events.<sup>15</sup> As crucial as these protections are, they do not account for many other personal or family needs that may arise for which workers currently have no protection.

For example, parents of special needs children are often required to have their children evaluated for special education-related services during business hours. Because these

---

<sup>14</sup> *Id.* at 1 & 4.

<sup>15</sup> N.Y.C. Admin. Code § 20-1261 (defining “personal event” as: (i) the need for a caregiver to provide care to a minor child or care recipient; (ii) an employee’s need to attend a legal proceeding or hearing for subsistence benefits to which the employee, a family member or the employee’s care recipient is a party; or (iii) any circumstance that would constitute a basis for permissible use of safe time or sick time).

needs are not necessarily medical, the law does not clearly protect them. The same is true of parent-teacher conferences. In addition, graduations, retirements, and other important life events and milestones are unprotected. The proposed legislation would allow workers to use earned personal time at their discretion for both foreseeable and unforeseeable events, whether it is an appointment scheduled weeks in advance or the unexpected death of a loved one.

Workers without family responsibilities will also benefit from this legislation. Only the luckiest of renters here in New York have managed to evade an apartment-related emergency such as a leaking ceiling or a backed up bathtub. As it stands, a worker could be legally fired for failing to report to work because their house is on fire. This law would change that.

That said, it should not take a catastrophic event to justify taking time off from work. The positive value of taking time off simply to relieve stress or to enjoy a day to one's self or with one's family, absent an emergency, should not be understated. In fact, studies have shown that taking personal time can improve one's health and longevity, including "a direct positive effect on mortality."<sup>16</sup> A Harvard Business Review study also found that personal time can improve employees' productivity, reporting that "employees in countries that take more vacation do have a strong desire to get a lot done as well as a tendency to move faster."<sup>17</sup>

Taking personal time therefore benefits workers' health and the economy. In addition to ensuring that workers are able to take time off work when unexpected personal or family needs arise, this bill would also give them the ability to recharge and return to work refreshed. One study has shown that when workers are able to take vacation, it betters

---

<sup>16</sup> BROOKS B. GUMP & KAREN A. MATTHEWS, PSYCHOSOMATIC MEDICINE, ARE VACATIONS GOOD FOR YOUR HEALTH? THE 9-YEAR MORTALITY EXPERIENCE AFTER THE MULTIPLE RISK FACTOR INTERVENTION TRIAL (2000),

<https://pdfs.semanticscholar.org/58e0/daefe57373f63f56d7a9ad55701ddee1fd2e.pdf>.

<sup>17</sup> Jack Zenger & Joseph Folkman, *Are We More Productive When We Have More Time Off*, HARVARD BUSINESS REVIEW (June 17, 2015), <https://hbr.org/2015/06/are-we-more-productive-when-we-have-more-time-off>.

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013

**tel:** 212.430.5982

[info@abetterbalance.org](mailto:info@abetterbalance.org)  
[abetterbalance.org](http://abetterbalance.org)

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
**tel:** 615.915.2417

their quality of sleep which results in an “80 percent improvement” in their reaction times, meaning people are sharper and more acute after taking time off.<sup>18</sup>

We are very proud that the Mayor and Council have recognized how important paid personal time is for the health and welfare of our City and are taking this monumental step forward toward improving the lives and wellbeing of workers and their families.

## **II. Intro 800-A Does Need to Be Amended in Several Key Ways**

There are, however, several concerns about the bill as presently drafted that we feel, as workers’ advocates, it is imperative we raise, and that the Committee and Public Advocate must remedy. The bill should be amended to 1) contain a private right of action so that workers can vindicate their rights in court, and restore the existing requirement that the enforcing agency attempt to mediate worker complaints; 2) guarantee that tipped workers receive the full minimum wage when taking sick/safe or personal time, and guarantee appropriate pay for all workers who take personal time; and 3) revise the accrual rate for personal time to ensure that, at the very least, full time workers can in fact accrue 80 hours of personal time each year.

### **A. Intro No. 800-A Must Include a Private Right of Action**

The proposed legislation does not contain a private right of action that would enable workers to vindicate their rights in court. New York City’s enforcement is lagging behind the enforcement of other jurisdictions with sick leave laws. **Over two-thirds of the nearly three-dozen paid sick leave laws in the U.S. include a private right of action, including Westchester.**

As we have seen firsthand through our work representing New York City workers whose rights were violated under the City’s sick time law, without a private right of action, workers lack assurance that their rights can be meaningfully enforced. Moreover, the proposed legislation removes the existing requirement that the enforcing agency attempt

---

<sup>18</sup> Alina Tugend, *Take a vacation, for your health's sake*, THE NEW YORK TIMES (June 8, 2008), [https://www.nytimes.com/2008/06/08/business/worldbusiness/08iht-07shortcuts.html?pagewanted=all&\\_r=1&\\_](https://www.nytimes.com/2008/06/08/business/worldbusiness/08iht-07shortcuts.html?pagewanted=all&_r=1&_).

to resolve the complaint through mediation<sup>19</sup>—which was included as a compromise in the law’s original administrative enforcement scheme as a guarantee that the worker would have some right to a voice in the administrative process which was the worker’s only vehicle for complaint. Deletion of the mediation requirement without including a private right of action leaves workers completely disempowered.

The existing administrative complaint process under the current paid safe and sick leave law is an important but inadequate means of enforcing the law as to individuals who have been harmed as a result of attempting to exercise their rights. That process must be supplemented with a private right of action in order to ensure that each worker in New York City can vindicate his or her rights.

Exclusive agency enforcement harms workers in several significant ways:

- 1. Cases languish and workers are left paying the price.** Administrative complaints can languish for years with no other recourse for aggrieved workers to obtain relief. One ABB client who filed an administrative complaint alleging sick leave violations was subject to egregious retaliation by her employer after she filed her sick time complaint, including a threat to her life. More than four years later, her case is still pending. Workers subject to retaliation for filing an administrative complaint or for otherwise asserting their rights under the law are left particularly vulnerable during the agency’s often-lengthy investigation process. In addition, the enforcing agency may prolong an investigation because it wants to pursue a company-wide investigation. While it is important to rout out pervasive abuses, it often leaves complainants waiting far longer for resolution than they would have had they been able to go to court.
- 2. The agency’s and the complaining worker’s priorities do not always align, leaving workers confused, disempowered, and without full relief.** Complainants are not parties in the administrative action—nor do they have the right to intervene as parties, as they do under the human rights law—which is problematic for workers because the agency’s interests do not always align with those of complainants. Workers are bound by all decisions the agency makes with

---

<sup>19</sup> See proposed § 20-924(c).

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013  
tel: 212.430.5982

info@abetterbalance.org  
abetterbalance.org

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
tel: 615.915.2417

respect to their case. For instance, the complainant does not have the right to accept or reject settlement offers. This is unfair, confusing, and disempowering to workers. Workers must accept any amount of money the agency negotiates on their behalf, which often means accepting less than 100% full relief even as the City pursues civil penalties or full relief for other non-complaining workers. Without complainants, there would be no recovery for anyone. Having a private right of action would ensure that workers, especially those who choose to speak out, can pursue full relief with respect to their own claims.

3. **Workers lack a single venue to vindicate their rights.** Workers who experience other labor abuses such as minimum wage violations or discrimination lack the ability to consolidate all of their claims in a single venue. This is both extremely burdensome for workers and an inefficient use of New York City resources. ABB represents multiple clients who had no other option but to file separate administrative complaints to vindicate their rights under both the sick leave law and the human rights law. If the sick leave law had a private right of action like the human rights law, these workers could have brought all of their claims in a single court complaint. In addition, we have found that agencies will delay investigating a complaint as they wait for resolution from another agency, leaving workers waiting additional years for resolution.
4. **Agency resources are not guaranteed in perpetuity.** Workers' already-limited ability to obtain relief through the administrative complaint process is dependent on the agency's resources. A future administration may not be inclined to fund enforcement of this law. Moreover, other laws enforced by the Department of Consumer and Worker Protection have private rights of action, including the Fair Workweek Law, Freelance Isn't Free Act, and Temporary Schedule Change Law. The Earned Safe and Sick Time Act is an outlier and needs to be updated.
5. **Adding a private right of action would also provide an opportunity to amend the law to expand the type of relief a worker can recover for violations of the law.** Right now, workers can recover damages only for back pay and fixed penalties for specific violations, but they cannot recover compensation for emotional distress, punitive damages, or attorneys' fees. For low-wage workers especially, the current enforcement scheme fails to make workers whole. Workers

often suffer immense emotional harm as a result of violations of the sick and safe leave law—they are penalized at a particularly vulnerable time when they or a loved one may have been ill or injured and should be able to recover emotional distress damages as well as punitive damages and attorneys’ fees.

**6. Failing to include a private right of action in the proposed legislation may also harm state efforts to pass a robust statewide paid sick and safe leave law with a private right of action.**

While the proposed legislation authorizes the Corporation Counsel to bring civil actions for violations of the law,<sup>20</sup> that by no means is an adequate substitute for a private right of action. First, the Corporation Counsel represents the City, not the worker. While a worker may obtain some relief from the Corporation Counsel’s litigation, this mechanism still leaves the worker with no ability to vindicate their own rights as a party.

Moreover, one of the main goals of the Corporation Counsel’s office is to increase revenue for the City. For instance, in its Fiscal 2020 Preliminary Budget Plan the Law Department highlighted: “Since Fiscal 2019 Adoption, the Law Department has recognized an additional \$14.5 million in affirmative litigation revenue for Fiscal 2019, bolstering projected revenue generation for the Department to \$36.7 million for the current fiscal year.” While it is an important aim for the City to raise revenue from affirmative litigation, this does not center workers’ needs and recovery.

The Corporation Counsel’s affirmative litigation unit is also ill-equipped to handle litigation under this law. In its FY 2020 Preliminary Plan, the office budgeted 28 positions for affirmative litigation (with a budget of \$2.8 million). Adding enforcement of this law to the Corporation Counsel’s already-tight budget is an inefficient use of New York City’s resources. A private right of action is both a better use of resources and more responsive to workers’ needs.

**In sum, we urge the Council to add a provision to the proposed bill authorizing workers to bring a civil action in a court of competent jurisdiction in order to enforce their right to paid sick, safe, or personal time, to remedy retaliation in**

---

<sup>20</sup> See proposed § 20-924.1.

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013  
**tel:** 212.430.5982

[info@abetterbalance.org](mailto:info@abetterbalance.org)  
[abetterbalance.org](http://abetterbalance.org)

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
**tel:** 615.915.2417

**violation of the law, or to remedy any other violation of the ordinance that harms the worker.** Administrative filing should *not* be a prerequisite to the filing of a civil action, and attorneys' fees, injunctive relief, back pay, and compensatory and punitive damages should be authorized for prevailing workers.

### **B. Intro 800-A Rolls Back the Rights of Tipped Workers & Does Not Make Clear the Pay Rate At Which Workers Must Receive Personal Time**

The proposed legislation rolls back the rights of tipped workers—including restaurant workers, car wash workers, and nail salon workers—by requiring that employers pay tipped workers only the tipped minimum wage rather than the full minimum wage as the existing paid safe and sick leave law has always provided, and as other jurisdictions' sick and safe leave laws around the country provide.

Specifically, the bill *removes existing language* providing that “in no case shall the paid safe/sick time hourly rate be less than the hourly rate provided in subdivision of section 652 of the labor law [the full minimum wage].”<sup>21</sup> This language was intended to ensure that tipped workers receive the full minimum wage when they take sick or safe leave because the tipped minimum wage is appropriate only if the worker gets tips; the need to take sick or safe leave necessarily means the worker will not be making tips. Without the right to earn at least the full minimum wage, tipped workers may be discouraged from taking sick or safe leave when they need to and come to work sick, or come to work rather than seeking safety.

At minimum, then, workers must receive full minimum wage for time off pursuant to paid sick and safe leave in order to promote the public health purposes of the law. However, workers should also receive the full minimum wage for personal time off. Unless the worker is entitled to reasonable compensation for the hours taken, low-wage workers will not be able to take that time.

Furthermore, although the definition of paid safe/sick time in the proposed bill still provides that the employee must be “compensated at the same rate as the employee earns from his or her employment at the time the employee uses such time,” that languages

<sup>21</sup> See proposed § 20-912 (defining “Paid safe/sick time”).

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013  
**tel:** 212.430.5982

[info@abetterbalance.org](mailto:info@abetterbalance.org)  
[abetterbalance.org](http://abetterbalance.org)

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
**tel:** 615.915.2417

applies only to safe/sick time, not personal time.<sup>22</sup> The provision on pay for personal time provides only that the employer is not required to pay *more* than the employee's regular rate of pay—not that the employer is required to pay *at least* that much.<sup>23</sup> Not only does this language signal that the full minimum wage does not apply for tipped workers, but it also indicates that the employer is not required to offer the same compensation as the worker normally earns for paid personal time off.

Intro 800-A also adds confusing language suggesting that an employer may choose whether to pay a worker the federal, state, or local minimum wage.<sup>24</sup> This should be revised to make clear that an employer must pay the *highest* applicable minimum wage. Since the passage of the original paid sick time law, the general minimum wage has been raised in the state of New York and some workers such as employees who work for the Port Authority are entitled to a higher minimum wage than that included in the minimum wage law cited in the ordinance. The full applicable minimum wage should be used as a minimum amount for workers when they are out sick, seeking safety, or taking personal time guaranteed under the law.

**We urge the Council to do the following:**

1. Restore the removed language defining “paid sick time” that assured no one would earn less than the full minimum wage, and add language indicating any applicable minimum wage that is higher should apply so that the last sentence of the § 20-912 definition of “earned sick time” will read:

*In no case shall an employer be required to pay more for paid safe/sick time than the employee's regular rate of pay at the time the employee uses such safe/sick time, except that in no case shall the paid safe/sick time hourly rate be less than the (1) the hourly rate provided in subdivision 1 of section 652 of the labor law, or (2) any other applicable state, federal or local law or (3) the minimum amount required to be paid to non-tipped*

<sup>22</sup> *Id.*

<sup>23</sup> See proposed § 20-913(5) (“An employer shall not be required to pay more to an employee for paid safe/sick time or paid personal time than the employee's regular rate of pay at the time the employee uses such paid time, except that in no case shall the paid hourly rate be less than the hourly rate applicable to the employee under federal, state, or local law.”).

<sup>24</sup> *See id.*

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013  
**tel:** 212.430.5982

[info@abetterbalance.org](mailto:info@abetterbalance.org)  
[abetterbalance.org](http://abetterbalance.org)

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
**tel:** 615.915.2417

*employees under any policy or rule of the Port Authority of New York and New Jersey, whichever is greater.*

2. Add a definition of “Paid personal time” that mirrors the above definition and eliminate the proposed 20-913(a)(5) or, alternatively, amend the proposed § 20-913(a)(5) to read:

*No employee shall be paid less for paid sick/safe time or paid personal time taken under this chapter than the employee’s regular rate of pay at the time the employee uses such paid time, except in no case shall the paid hourly rate be less than the hourly rate provided in subdivision 1 of section 652 of the labor law or (2) any other applicable state, federal or local law or (3) the minimum amount required to be paid to non-tipped employees under any policy or rule of the Port Authority of New York and New Jersey, whichever is greater.*

**C. Intro 800-A Must Be Amended to Ensure the Accrual Rate Guarantees Workers Can Earn 80 Hours of Paid Personal Time Per Year**

The Mayor has indicated that it is the aim of this legislation to guarantee workers 80 hours of paid personal time per year. However, as drafted, the legislation would not achieve that aim. Intro 800-A provides that workers will earn one hour of personal time for every 30 hours worked. Under that scheme, even full time workers—who work approximately 2,080 hours per year—would accrue no more than 69.3 hours of paid personal time in a year, or 10.7 hours less than the intended 80 hours.

Furthermore, the law’s carry-forward provision would enable a worker to take 80 annual hours of personal time under only some, very limited circumstance. Consider the following: a worker who earns the maximum 69.3 hours in one year and actually uses that time would have no time remaining to carry forward to the next year. Therefore, the maximum amount of time that worker could earn and use in the subsequent year would again be only 69.3 hours. The worker would reach 80 hours in a subsequent year only if they were able to carry over 10.7 unused hours. But if the worker then used 80 hours of leave in that subsequent year and had no personal time left to carry forward to the next, they would again have only 69.3 hours in the year after that.

**Headquarters**

40 Worth Street, 10th Floor  
New York, NY 10013  
**tel:** 212.430.5982

[info@abetterbalance.org](mailto:info@abetterbalance.org)  
[abetterbalance.org](http://abetterbalance.org)

**Southern Office**

301 21st Ave. South, Suite 355  
Nashville, TN 37212  
**tel:** 615.915.2417

Under the present accrual rate, then, it is simply not accurate to characterize the law as giving a worker 80 annual hours of personal time off work. The accrual rate should be amended to mathematically guarantee that at least a full-time worker could earn 80 hours in a one-year period. The solution is to amend the bill to allow accrual of one hour of personal time for at least every 26 hours worked, rather than for every 30 hours worked. This would give full-time workers who work a 40-hour work week the ability to earn 80 hours of personal time in one year, while workers who work 30 hours per week would be able to earn 60 hours of personal time in one year.

**Given the bill's misalignment with the Mayor and Council's stated goals of this measure, we recommend that the accrual rate for personal time be changed to one hour of personal time for every 26 hours worked.**

### **III. Conclusion**

Intro 800-A is a pathbreaking measure. New York City can and should be a leader in the movement to ensure all workers have the time they need to both thrive in the workplace and at home, and this bill would achieve that aim. That said, we must ensure that in this pursuit, the Council and Public Advocate do not simultaneously roll back or limit the rights of workers, especially low-wage workers, and their ability to fully exercise their rights under the law. We implore the Council to address our concerns with the bill and act swiftly to make our proposed changes.



## Testimony of the Partnership for New York City

### New York City Council Committee on Civil Service and Labor

**Proposed Int. No. 800-A,  
requiring city employers to provide earned safe, sick, and personal time to employees.**

**May 28, 2019**

---

Thank you Chair Miller and members of the committee for the opportunity to testify on providing paid vacation time to private employees. The Partnership for New York City represents employers of a million private sector workers in the city.

The Partnership opposes Proposed Int. 800-A as an imposition on the decision of what benefits private sector employers will provide their employees. Adding ten vacation days to the five mandated paid sick days would triple the amount of paid time off for New York City employees. It would require little or no notice to employers and would substantially add to the administrative and cost burdens that the city and state have placed on employers.

These burdens are particularly difficult for small businesses to bear. They do not have legal departments to interpret new laws or human resource professionals to manage the compliance and recordkeeping for new mandates. Empty storefronts, which the Council is concerned with, are a symbol of the impact of a less-friendly business climate in the city. This is in part a result of the growing cost of new mandates, ranging from increased minimum wage to new scheduling restrictions and new training requirements that employers must comply with.

Most large employers provide paid time off, often more than would be mandated under the proposed legislation. But every company has different practices with respect to how and when this leave is taken, depending on their individual business requirements. For example, many employers incentivize employees to take time away from work by requiring them to take all of their leave time each year. Other employers allow carry over of a limited amount of unused leave time, but policies vary widely in the amount and type of time that can be rolled over. Most large employers have operations outside the city and their leave policies are difficult to change in response to local law.

There is no clear reason why the City Council should impose a single paid time off policy on all New York City employers. Certainly the specific prescriptions in this bill leave little room for policies that reflect the needs of individual businesses or the extent of the hardship that this may impose on some employers. We recognize the political impetus for the legislation and urge that, if you are moving forward, the law exempt businesses with fewer than twenty employees and all those employers who certify that they are already providing at least fifteen days of paid time off pursuant to collective bargaining agreements or their own benefit arrangements. This would at least mitigate the negative impact of the bill.



**BROOKLYN**  
CHAMBER OF COMMERCE

The  
**Brooklyn**  
Alliance

**BROOKLYN**  
ALLIANCE  
**CAPITAL**

May 28, 2019

**Testimony submitted to the New York City Council regarding Introduction 800-A in relation to requiring city employers to provide earned safe, sick, and personal time to employees**

Good morning Chair Miller and members of the Committee on Civil Service and Labor. I am Samara Karasyk, Chief Policy Officer at the Brooklyn Chamber of Commerce. The Brooklyn Chamber of Commerce is among the largest and most influential business advocacy organizations in New York, having spent the last hundred years developing and promoting policies that drive economic development and advance its members interests. The Chamber is the voice of Brooklyn's business community, offering the resources, programs, tools and direct support businesses need to continue creating jobs and opportunities in their communities.

The Brooklyn Chamber supports strengthening worker protections. Our businesses care about their workers having good work/life balance and earning a living that supports their families. They fundamentally believe in the concept of paid time off for employees. However, we cannot support this bill. Our member businesses are currently facing so many regulatory and economic challenges that it is threatening their ability to survive. The proposed legislation would mandate that employers with five or more employees be required to provide employees with up to 10 days of paid personal time off annually. Small businesses feel every additional cost keenly because they do not have a cushion to absorb it. This new mandate would have a devastating impact on the small businesses that are the backbone of our city.

On top of recently passed legislation increasing minimum wage, requiring paid sick leave, rising rents, and the cost and complexity of regulatory violations, our members cannot take one more cost on top of their already thin profit margins. Member businesses have relayed to us their concerns that this legislation will make it difficult to maintain current staffing levels. They may be forced to eliminate positions, as some already have, and will not be able to offer robust training programs under these conditions. We are concerned that this legislation will push many businesses to circumstances where they will be unable to function, and to ultimately shut down or move their production outside of New York City. This bill needs to look at the overall picture of all the bills and regulations that have recently gone into effect and consider the additional burden this would cause.

The Brooklyn Chamber is very focused on job creation that enables our communities, residents and businesses to all thrive. This bill would prevent our economy from continuing to grow good paying jobs and much needed training opportunities for our local workers. We cannot require 10 days of paid time off for workers without tying it to relief for small businesses so that they can maintain their businesses and continue to grow both their bottom lines and the number of jobs they create.

Thank you for the opportunity to comment on Introduction 800-A. I would be happy to take any questions that you may have.

## **Testimony of Whitney Moore**

Good morning.

I would like to thank the Council for holding this important hearing.

My name is Whitney Moore and I've been working as a checkpoint agent for Eulen at JFK in Terminal 8 since October 2018.

At the airport, I work in a stressful, highly intense environment. It wears on you.

Sometimes, you just want a day off.

The proposed paid time off will help workers like me a great deal because not only will I be able to get time off when I need without having to sacrifice my paycheck, I can help my mom and my grandmother out or just spend time with them.

I want to be able to take time off without worrying whether my job will be there when I get back.

One of my concerns is about our sick days at work, which my employer, Eulen America, calls "paid time off." We get a total of five days or 40 hours. There is a New York City paid-sick leave law that also grants five days or 40 hours if we're sick or need to care for loved ones. It seems a little different from what my employer provides, which a catch-all where you could take it as sick leave or vacation, once you accrue enough time to use it.

I want to make sure that when the paid time off law passes, that it would be in addition to the city's sick leave law so that employers don't violate either law and shortchange us workers with something less than the two laws provide.

I appreciate the opportunity to address this hearing because this is very important to my co-workers and I.

It will help so many workers like me have some safety and stability in our lives.

We work hard every day to keep New York running and now, when this law passes, we will be able to take care of ourselves as well.



**Testimony before the New York City Council  
Committee on Civil Service and Labor**

Int. 800A

May 28, 2019

Good Morning Chair Miller and other members of the committee. My name is Nelson Eusebio and I'm the Director of Government Relations for the National Supermarket Association (NSA). NSA is a trade association that represents the interest of independent supermarket owners in New York and other urban cities throughout the East coast, Mid-Atlantic region and Florida. In the five boroughs alone, we represent over 400 stores that employ over 15,000 New Yorkers.

Our members work hard every day to run their businesses, support their families and provide jobs and healthy food options to their communities.

I'm here today to testify on Introduction 800A – A law requiring city employers to provide earned safe, sick, and personal time to employees.

While we support the intent of the bill, we have some concerns surrounding the cost and parameters for implementation. Many NSA members provide paid personal time for full time employees however, our members don't necessarily provide the same for part-time employees. Part-time work is inherently flexible in nature and in many cases the employer is scheduling around the employees' needs. The reality is that many of our part time employees are kids who apply for part-time work to make some extra money to help their families, save for their future, and have some spending cash.

Requiring paid vacation for part-time employees will only serve to steer employers away from hiring part-time workers, which will undoubtedly impact young high school and college students.

We hope that the council will consider exempting small businesses, with 50 employees or less from having to provide paid personal time to part-time staff.

Thank you for your consideration and I'm happy to answer any questions.

# FISCAL POLICY INSTITUTE

11 Park Place, Suite 701, New York, NY 10007 • 212-721-5624

Testimony of  
Jonas J.N. Shaende, PhD  
Chief Economist

Before the  
Committee on Civil Service and Labor  
New York City Council

Hearing on  
Proposed Introduction No. 800-A, sponsored by The Public Advocate  
May 28, 2018

I am pleased to be invited to testify today in connection to the proposed amendments to the administrative code of the city of New York, in relation to requiring city employers to provide earned safe, sick, and personal time to employees. My name is Jonas Shaende. I am the Chief Economist at the Fiscal Policy Institute, a nonpartisan nonprofit think-tank that produces research on New York economic, tax, budget, migration, and other policy issues.

The Fiscal Policy Institute views Int. 800-A as a meaningful step in the direction of developing a comprehensive leave policy framework for NYC workers. The United States is one of the very few countries in the world, and an exception among advanced economies, without a national paid leave policy. This makes the role of state and local governments like New York's in paid leave policy innovation crucial. The federal law is, in many respects, insufficient for modern workplace and New York has made real progress in the past decade in advancing its labor standards. Enhancing worker protections adds value to the buoyant economy and directly benefits workers who are otherwise excluded from access to such benefits. Those would disproportionately be lower-income<sup>1</sup> and less educated workers.<sup>2</sup> While some US workers are eligible for 12 weeks of unpaid leave through the Family and Medical Leave Act of 1993, because of the law's eligibility requirements, only 60 percent of workers and about 20 percent of new mothers have access to

---

<sup>1</sup> Council of Economic Advisers (CEA). 2014, June. "The Economics of Paid and Unpaid Leave." Council of Economic Advisers, White House, Washington, DC.

<sup>2</sup> U.S. Department of Labor. 2015 "Wage and Hour Division (WHD): Chapter 3. Use of the FMLA." U.S. Department of Labor, Washington, DC. <https://www.dol.gov/whd/fmla/chapter3.htm>.

legally mandated unpaid leave. Research indicates that even workers who are eligible for unpaid time off, often do not take it.<sup>3</sup>

Access to paid time off is generally even more limited. In 2018 only 17 percent of the private sector workforce and 5 percent of workers in the bottom ten percent of the wage distribution received paid family leave, while only 45 percent of the private sector workforce and 14 percent of workers in the bottom ten percent of the wage distribution received paid personal leave through their employer.<sup>4</sup>

Overwork and schedule inflexibility along with irregular work schedules present a challenge for a growing number of workers as they struggle to find work-life balance. Besides needless hardship, the lack of flexibility also takes a toll on the local economy and businesses through increased turnover. About one-third of those who leave their current jobs and almost two thirds of those who cut their hours to part-time cited long, inflexible work schedules as the main reason.<sup>5</sup>

According to the Pew Research Center, while most Americans say they have taken or are very likely to take family or medical leave at some point, many lower-income workers, say they are not able to take time off from work when they need to.<sup>6</sup> About one-third of those in households with incomes under \$30,000 wanted to but were unable to take time off from work following the birth or adoption of their child, to care for a family member with a serious health condition or to deal with their own serious health condition. Personal time off as such is out of reach for many workers in this income group.

This legislation (Int. 800-A) would expand NYC's Earned Safe and Sick Time law by adding up to 80 hours of accrued personal time off per year. Additionally, Int. 800-A furthers worker protections under the city law with respect to leave policies. All NYC employers with at least five employees and all employers of one or more domestic workers would be required to provide one hour of personal time (which could be used for absences from work "for any reason" and rolled over from one year to the next) for every 30 hours worked, up to a maximum of 80 hours. The legislature expands protections to employees as the language relating to the employers who engage "in retaliation or threaten retaliation" is broadened to "any adverse action that penalizes an employee for, or is reasonably likely to deter an employee from" exercising or attempting to exercise their rights under the law. Additionally, the legislation would change the current

---

<sup>3</sup> U.S. Department of Labor. 2015, September. "The Cost of Doing Nothing: The Price We All Pay without Paid Leave Policies to Support America's 21st Century Working Families." U.S. Department of Labor, Washington, DC. <https://www.dol.gov/wb/resources/cost-of-doing-nothing.pdf>.

<sup>4</sup> Bureau of Labor Statistics. 2018 "National Compensation Survey: Employee Benefits in the United States, March 2016." Table 32a. Bureau of Labor Statistics, U.S. Department of Labor, Washington, DC. <https://www.bls.gov/ncs/ebs/benefits/2018/employee-benefits-in-the-united-states-march-2018.pdf>.

<sup>5</sup> Stone, Pamela, and Lisa Ackerly Hernandez. 2013. "The All-or Nothing Workplace: Flexibility Stigma and Opting Out' among Professional-Managerial Women." *Journal of Social Issues* 69 (2): 235–56.

<sup>6</sup> Horowitz, Juliana Menasce, Kim Parker, Nikki Graf, and Gretchen Livingston. 2017 "Americans Widely Support Paid Family and Medical Leave, but Differ over Specific Policies: Personal experiences with leave vary sharply by income." <https://www.pewsocialtrends.org/2017/03/23/americans-widely-support-paid-family-and-medical-leave-but-differ-over-specific-policies/>

exclusively complaint-based system by authorizing the city's corporation counsel to pursue enforcement and initiate civil actions against employers for violations.

Many of the city's workers, especially those with lower incomes and less education, would be positively impacted by these changes.

Thank you for your attention, and I am happy to answer your questions.



### Jordany Bueno Testimony

Good afternoon,

My name is Jordany Bueno and thank you for giving me the opportunity to address you today on an issue that is so vital to all working New Yorkers.

I have worked at LaGuardia Airport for the past eight years as a wheelchair agent. It is hard, back-breaking work that is often stressful.

You should be there to see the scramble when an international flight disgorges scores of people, tired from their journey, some of them sick, all of them anxious to get home or their destinations in the city.

It is the job of my co-workers and I to care of these travelers and make sure their passages through our airports are safe.

The last time I took time off, I went to the Dominican Republic for the first time in ten years. I saw my younger cousins who I didn't even recognize anymore.

Though I'd been fortunate to retain my job, the loss of income meant it took time to catch up with my bills. I had to do without some things so that I could pay rent to keep a roof over my head.

The Dominican Republic still feels like home to me, and I wish I had paid time off to be able to go back more.

A law like this will be such a Godsend for me and my family.

I'm grateful the City Council passed a law that gives us five paid sick days, but we need more.

My co-workers and I will very much appreciate the safety and stability in our lives that this law will provide.

Thank you.



### Saeed Bacchus Testimony

Hello everyone,

My name is Saeed Bacchus and I appreciate the opportunity to talk with you all today about an issue that is very important to the quality of life for New Yorkers.

Having time off from work without worrying about losing income that I need to protect me and my family is a huge deal for working people like me in New York City.

I have worked at JFK airport for the past 11 years as a security officer.

I have 3 children who all live in different states and four grandchildren. Everyone needs time off to see their family.

When my mother died last year, I had to beg my boss for time off.

We also need time off to simply rest your body! We need to be able to recuperate, so we can be productive when we're on the job.

I'm grateful the City Council passed a law that gives us five paid sick days, but workers need more.

So, I am here to pledge my support for this legislation because it will help so many workers like me have some safety and stability in our lives.

We work hard every day to keep New York running and hopefully now we will be able to take care of ourselves as well.



**Pedro Gaboa-Bermudez Testimony**

Hello everyone,

My name is Pedro Gaboa-Bermudez. Thank you for the opportunity to testify today.

I have worked at JFK airport for the past nine years as a baggage handler.

I have a 93 year old mother who lives in Guatemala. When she gets sick, I want to be able to go and take care of her. If I do decide to take the unpaid time off, I don't know how I'll pay the bills when I return.

When I come back, I have to juggle my bills, pay some and hold the others to the next months until I am able to catch up. Living paycheck to paycheck, I never know if I'm going to come back and be homeless.

For the most part, taking days off haven't been worth the risk of becoming homeless or go without food.

I know so many others who are in this situation, and it shouldn't be like this.

I applaud everyone for working on this law and doing what is right for workers. This will help millions of people in New York City.

We appreciate that a lot of you have been with us as we fought for higher wages and more protections in the airport. I'm grateful the City Council passed a law that gives us five paid sick days, but we need more.

My co-workers and I need the safety and stability in our lives that this law will provide.

Thank you.



FOR THE RECORD

#### Testimony of Elizabeta Salinovic

Hi, my name is Elizabeta Salinovic. I am commercial cleaner and a member of 32BJ SEIU.

I am grateful to have paid time off, but my husband does not. We can't go on vacation together, and he can't take off time when he needs to. This would make a huge difference in both of our lives.

Because I know how valuable paid time off is, I am supporting the bill to give 10 days of paid time off to nearly all workers in the City.



FOR THE RECORD

### Testimony of Mark Espinoza

Hi, my name is Mark Espinoza. I am a school cleaner and a member of 32BJ SEIU.

Because I have paid time off, I can conserve sick time for when I am actually sick. Life can sometimes get a little complicated, and NYC can be a stress-inducing environment. All of my time is usually spent either doing chores and other responsibilities with home and family, going or coming from work, eating, and sleeping. Paid time off allows me to either catch up with responsibilities, or spend more quality time with my family. Being able to take time off when I need it allows me to be the best version of myself.

Because I know how valuable paid time off is, I am supporting the bill to give 10 days of paid time off to nearly all workers in the City.



FOR THE RECORD

### Testimony of Clementine James

Hi, my name is Clementine James. I am a security officer and a member of 32BJ SEIU.

Having time off from work allows me to recharge so that I can be better equipped to take care of myself, family, and do my job to the best of my ability.

Because I know how valuable paid time off is, I am supporting the bill to give 10 days of paid time off to nearly all workers in the City.

*FOR THE RECORD*



### **Testimony of Saul Hernandez**

Hi, my name is Saul Hernandez. I am a commercial worker and a member of 32BJ SEIU.

By passing this law, there will be more healthy and rested workers on the job. It is the right thing to do for the people of our City.

Because I know how valuable paid time off is, I am supporting the bill to give 10 days of paid time off to nearly all workers in the City.



Hello everyone,

My name is Vladimir Clairjeune and I am so happy to be talking to you today. I have worked at JFK airport for the past 12 years, as a passenger service representative.

Today, I am here speaking on behalf of thousands of airport workers, who do not have access to adequate paid time off.

Throughout the years, I have seen my fellow colleagues miss out on weddings, forego various family celebrations, or just take the opportunity to take a break for a week, knowing that a pay check will be there when they return. Millions of people travel through our terminals each year, wouldn't be nice for my airport colleges get the opportunity to be a passenger in the terminals in which they maintain?

City Council members, I would like to present to you these copies of a petition that have been circulated at both JFK & LGA airport. Over 2,000 airport workers have signed on to this petition, urging City Council to pass this paid time off legislation. As we continue to gain more signatures, I ask you, City Council members, to vote yes and give us airport workers access to paid time off.

Thank you again for your time and for this hearing.



Hello everyone:

My name is Juniya Montomery and I appreciate the opportunity to talk with you all today.

We are facing an issue that is very important to the quality of life for most New Yorkers: Paid time off. For myself, having time off from work without worrying about losing income, in which I need to protect my family, is a huge deal for working people, like myself in New York City.

I have worked at JFK airport for the past two years as a Wheelchair Agent. We do not receive any paid vacation. This year, I had the flu, which caused an absence of seven work days. I had already exhausted my five paid sick days, due to a different ailment. So I had to take a financial burden of no paycheck for my family for two weeks. In my time here, I have yet to be able to disconnect from work for any rest, relaxation or to meet and hold my three new grandchildren in my home country of Jamaica. I ask you City Council members to vote yes and pass this legislation.

Thank you again for your time and for this hearing.

Good Afternoon. My name is Rosa  
Riveras I'm 53 years old  
~~Gilberto~~ and I am a fast food  
worker.

I want to thank Mayor Bill de Blasio,  
Public Advocate Jumaane Williams and  
the NYC City Council. A law like this  
will be a great help for hardworking  
New Yorkers. We deserve a break.

I have lots off family in El Salvador the  
I have not seen in many years, especially  
my mother. If you pass this law, I will  
be able to see her again. Thank  
you so much for thinking of  
us.

in 6 years  
My name is Violetha Luis and I am  
a fast food worker.

I want to thank the mayor, ~~and~~ public  
Advocate and members of the City Council  
for thinking about us and for writing  
a law like this.

For me, as a worker, this law will help  
a great deal because I will be able to  
use that time to visit my family in the  
Dominican Republic without worrying  
about losing income that I need to  
pay my bills and support my  
family. Thank you so much

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Christopher Irish  
[irish.christopher@gmail.com](mailto:irish.christopher@gmail.com)

Clinton avenue  
Brooklyn, NY 11238  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Justin Savage  
[justin@twoboots.com](mailto:justin@twoboots.com)

Grayley Place  
Huntington Station, NY 11746  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,

Andrew Fox

[ajf@carolines.com](mailto:ajf@carolines.com)

Broadway  
New York, NY 10019  
Constituent

Re: Support Small Biz Oppose Int 800A- URGENT

Dear Hearings,

Please OPPOSE Int 800A. This is such an important issue to small business survival. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Kelly Fitzpatrick

[kelly@blueparkrestaurants.com](mailto:kelly@blueparkrestaurants.com)

Pine Street  
New York, NY 10005  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Adrienne Guttieri  
[aguttieri7@gmail.com](mailto:aguttieri7@gmail.com)

e 85th street  
New York, NY 10028  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. **COMING ON TOP OF THE DOUBLING OF THE MINIMUM WAGE, THIS BILL IF PASSED WILL FORCE ME TO CLOSE MY RESTAURANT, AND IN DOING SO MY 45 EMPLOYEES WILL LOSE THEIR JOBS.** THIS WILL BE THE STRAW THAT BREAKS THIS CAMEL'S BACK. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Greg Hunt  
[greghuntabc@gmail.com](mailto:greghuntabc@gmail.com)

Central Park West  
New York, NY 10023  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Thomas Connolly  
[bb627nyc@gmail.com](mailto:bb627nyc@gmail.com)

2nd avenue  
New York, NY 10016  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Stephen Hansman  
[stephen@bayhousebar.com](mailto:stephen@bayhousebar.com)

Bayview Ave  
Rosedale, NY 11422  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,

EJ Marotta

[emarotta@sweethospitalitygroup.com](mailto:emarotta@sweethospitalitygroup.com)

Broadway, Suite  
New York, NY 10019  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Karlin Ames  
[karin.ames@ldry.com](mailto:karin.ames@ldry.com)

3rd ave  
New York, NY 10128  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
mitch cynamon  
[mitch@initiatecare.com](mailto:mitch@initiatecare.com)

Fort Greene Place  
Brooklyn, NY 11217  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Elise Rosenberg  
[elise@colonienyc.com](mailto:elise@colonienyc.com)

Atlantic Avenue  
Brooklyn, NY 11201  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Ksenia Kulynych  
[ksenia@addisongroupnyc.com](mailto:ksenia@addisongroupnyc.com)

71 W 35th Street 18th Floor  
New York, NY 10001  
Constituent

Re: Int 800A = Hardship for Small Businesses

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees.

When I moved to New York City to start open a restaurant, I viewed NYC as a business-friendly environment that would allow my small business to flourish. Initiatives like 800A are dangerous to small businesses like mine, especially in a city with rising rents and other costs of doing business.

I would prefer that I be allowed to offer paid leave as a benefit to long-term and outstanding employees, instead of as a mandatory benefit for every hourly worker hired. I am all for good quality of life for hourly employees, and feel strongly that it is the place of the small business owner--NOT the government--to make the decision to offer benefits like this to its workers.

If this law must be passed at all, please consider limiting it only to businesses with more than \$10M a year in revenue. It's simply not feasible for smaller operators with fewer locations and less revenue, like myself.

Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Delores Tronco

Greenwich Avenue  
New York, NY 10011  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Jeffrey Nathan  
[jeff@abigaels.com](mailto:jeff@abigaels.com)

1407 Broadway  
New York, NY 10018  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Lindita Paloka-Iasilli

Barclay Street  
New York, NY 10007  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Joshua Cohen  
[bluedogcohen@gmail.com](mailto:bluedogcohen@gmail.com)

Richardson st  
Bklyn, NY 11211  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

My partners and I own 7 restaurants. Our labor costs have already become crippling with the increases in the hourly and the exempt minimum wage. Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses. As you already know retail in this city is suffering and a lot of restaurants with it. This law will result in many more empty storefronts and lower employment.

Sincerely,  
Stewart Rosen  
[swr47@mac.com](mailto:swr47@mac.com)

Third Avenue  
New York, NY 10017  
Constituent

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Raul Leyva  
[raul.leyva@ldry.com](mailto:raul.leyva@ldry.com)

20 avenue  
brooklyn, NY 11204  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Adam palacha

Hudson St  
New York, NY 10014  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Karen Flores

58th st  
Woodside, NY 11377  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Jessica Figueira

34th St  
Astoria, NY 11106  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

I own a business that employees appx 80 people here in lower Manhattan. My husband and I have operated Aquagrill for 24 years. Our lease is up in 2020 and we may not be able to continue operating as small businesses like ours have been hit with so many increases in the cost of doing business without reciprocal tax breaks of any kind. I'm writing to ask you to please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another "positive sounding" mandate on my business that will have negative consequences for us, and then ask what you can do to save our city's dying small businesses.

Sincerely,  
Jennifer Marshall

Spring Street  
New York, NY 10012  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Devendra Sharma

East 51st street  
New York, NY 10022  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Greg Markman  
Heights Cafe  
Dellarocco's

Sincerely,  
Greg Markman

Montague Street  
Brooklyn, NY 11201  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Susan Povich

Van Brunt St  
Brooklyn, NY 11231  
Constituent

Re: Baz Bagel - 181 grand

Dear Hearings,

I'm writing to you from Baz Bagel and Restaurant. I have 20 employees. It is financially impossible to offer the employees 3 weeks off AND find coverage for them while they are off and operate without going into the red. I'd be happy to share financials with you to see how this affects a business like ours. We are financially healthy by the small margins restaurants make and this would be enough to close our doors

I am urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees.

I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
BARI MUSACCHIO  
[bari@bazbagel.com](mailto:bari@bazbagel.com)

181 grand street  
NY, NY 10013  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
alexander lapratt

15 main st  
BROOKLYN, NY 11201  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,

Jacob Colon

[jacob.colon@ldry.com](mailto:jacob.colon@ldry.com)

1238 Simpson St.

BX, NY 10459

Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Carlos Sanabria  
[csanabria@ldry.com](mailto:csanabria@ldry.com)

373 Park avenue south  
New York, NY 10016  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Sarah Pence

[smppence16@gmail.com](mailto:smppence16@gmail.com)

139 40th st

Union City, NJ 07087

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

I would be happy to meet in person to discuss other issues facing independently owned restaurants in the city.

Stephen Shanaghan

Sincerely,  
Stephen Shanaghan

E 19th Street  
New York, NY 10003  
Constituent

Re: STRONGLY OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Jenni Pietro

West 89th Street  
New York, NY 10024  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Denis Keane

2nd Ave  
New York, NY 10022-7744  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it impossible to survive running a local business with the constant mandates. There are already enough vacant storefronts around the city, many of my wholesale clients have closed and I have had to reduce hours for many of my employees. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed. The high minimum wage and high costs of taxes and work comp are killing small businesses. Only Pret a manger and Starbucks will be left.

Amy Scherber  
Amy's Bread

Sincerely,  
Amy Scherber

34th Street  
Long Island City, NY 11101  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Ronnie Flynn  
[ronnie@theflowershopnyc.com](mailto:ronnie@theflowershopnyc.com)

107 Eldridge St  
New York, NY 11211  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Tory Dellany

west 3rd street  
New York, NY 10012  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Tiffany Bowen

W 131st Street  
New York, NY 10037  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Further, MANY of our employees work less than 20 hours per week. All this will do is cut hours for everyone. This is absurd.

Sincerely,  
Amanda Key  
[accounting@happiesthournyc.com](mailto:accounting@happiesthournyc.com)

121 W. 10th Street  
New York, NY 10011  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Marco Moreira  
[marco@tocquevillerestaurant.com](mailto:marco@tocquevillerestaurant.com)

1 east 15th Street  
Nyc, NY 10003  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

This is insanity. You are driving us out of NYC. I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC.

Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

I can not afford this type of increased payroll cost and must pass this onto my customers, if they will bare it. And If not I will go out of business. I have about 50 employees in my restaurant, and this will add an additional \$60,000 in cost!

This on top of \$15/hour, the required PTO and the Fair Work Week!!

This is crazy. I have already closed 1 restaurant and will probably close another.

Sincerely

Bruce Colley.

Sincerely,  
Bruce Colley

E 68th  
NYC, NY 10065  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Reed Osterholt  
[reed.osterholt@ldry.com](mailto:reed.osterholt@ldry.com)

East 105th Street  
New York, NY 10029  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Michael Hamilton  
[michael@theflowershopnyc.com](mailto:michael@theflowershopnyc.com)

107 Eldridge Street  
NYC, NY 10002  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Michael Hamilton  
[michael@theflowershopnyc.com](mailto:michael@theflowershopnyc.com)

107 Eldridge Street  
NYC, NY 10002  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Beatrice Stein  
[beatrice.stein@icloud.com](mailto:beatrice.stein@icloud.com)

West 112th Street  
New York, NY 10026  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Michael gershkovixh

[mike@mikesbistro.com](mailto:mike@mikesbistro.com)

127 east 54th st  
New York, NY 10022  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Brian Baker  
[brbakeresq@aol.com](mailto:brbakeresq@aol.com)

509 E 83rd St.  
New York, NY 10028  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Kristofer Polak  
[kris@brrest.com](mailto:kris@brrest.com)

65 Henry Street  
Brooklyn, NY 11201  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

Why are you wagging war on small business?? Its like you are not even paying attention to what is going on in this city? People are leaving in droves, empty real estate for blocks and blocks, business leaving left and right!! Your liberal agenda is killing this city!! Get off your high horse and start implementing policies that are pro-business!

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Todd Cederholm  
[t.cederholm@chefdriven.com](mailto:t.cederholm@chefdriven.com)

320 Amsterdam Ave  
New York, NY 10023  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Rodney Booij  
[rodney.booij@ldry.com](mailto:rodney.booij@ldry.com)

1078 SAINT JOHNS PLACE  
BROOKLYN, NY 11213  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Michelle Foster  
[info@goodmovebk.com](mailto:info@goodmovebk.com)

167 Nassau Ave  
Brooklyn, NY 11222  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
craig watson  
[craig@bakedcravings.com](mailto:craig@bakedcravings.com)

1673 lexington ave  
new york, NY 10029  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Gianfranco Sorrentino  
[contactus@ilgattopardonyc.com](mailto:contactus@ilgattopardonyc.com)

13 west 54 street  
new york, NY 10019  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Michael Miranda  
[mmiranda@brquestinc.com](mailto:mmiranda@brquestinc.com)

675 Hudson Street, Dos Caminos  
New York, NY 10014  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Richard Wolf  
[mamboproductions@yahoo.com](mailto:mamboproductions@yahoo.com)

Two Penn Plaza, 19th Floor  
New York, NY 10121  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Vannesa Shanks  
[vannesa@me.com](mailto:vannesa@me.com)

345 Grand st  
Brooklyn, NY 11211  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
eduardo lopez  
[eduardo.lopez@ldry.com](mailto:eduardo.lopez@ldry.com)

elmhurst ave  
elmhurst, NY 11373  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Leslie Barnes  
[leslie@londonlennies.com](mailto:leslie@londonlennies.com)

woodhaven blvd  
Rego Park, NY 11374  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

As a NYC Certified MWBE, I constantly hear the Mayor talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Cheryl L Gentry  
[cheryl@glowglobalevents.com](mailto:cheryl@glowglobalevents.com)

1460 Broadway  
New York, NY 10036  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Kylie Sachs  
[kyliesachs@gmail.com](mailto:kyliesachs@gmail.com)

162 Saint Marks Avenue  
Brooklyn, NY 11238  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
John McDonald  
[john@jmcdonald.com](mailto:john@jmcdonald.com)

134 Spring Street  
New York, NY 10012  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

joe mcdonald

[joe@jmcdonald.com](mailto:joe@jmcdonald.com)

134 Spring Street, #502

New York, NY 10012

Constituent

Re: OPPOSE Int 800A

Dear Hearings,

As born and raised New Yorker I beg you to Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Mario A Riva  
[mario@carrollplacenyc.com](mailto:mario@carrollplacenyc.com)

157 Bleecker Street  
New York, NY 10012  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
chris dunnigan  
[cdmusic@aol.com](mailto:cdmusic@aol.com)

thompson street  
new york, NY 10012  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Hollie Leblang  
[hleblang@ldey.com](mailto:hleblang@ldey.com)

broadway  
New York, NY 10036  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Garrett Ronan  
[garrett.ronan@yahoo.com](mailto:garrett.ronan@yahoo.com)

East 41st St  
New York, NY 10017  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Please, we survive on being a VALUE minded, quick service restaurants that cannot keep menu prices low or a good values, and staff the business with enough staff to offer quick friendly service if this new law goes through??

When you look at all the MAJOR costs we have had to absorb in the restaurant business and this is very damaging especially in NYC as many tourist see our brand as a brand they can trust!

When a brand like McDonalds has to raise prices to constantly absorb the unfair NYC costs of doing business, it reflects on NYC as well esp. with tourists by paying more??

Sincerely,  
Jim Dorsey  
(A New York'r my entire life)

Sincerely,  
Jim Dorsey  
[jmdrsy@yahoo.com](mailto:jmdrsy@yahoo.com)

half moon bay dr  
croton on hudson, NY 10520  
Constituent

Re: I implore you to reject Int 800A = More Vacant Storefronts

Dear Hearings,

Your help is greatly needed. I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut.

Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed. Restaurants are in survival mode. Another mandate will only provide more lost jobs and restaurant closures. Many in this industry are transient or pursuing their own dreams while using the restaurant industry as a means to an end. For those of us married to this industry, we are failing because we cannot survive with these mandates. No one wants to get us every day to barely exist.

Sincerely,  
Suzanne Greco  
[suzgreco@hotmail.com](mailto:suzgreco@hotmail.com)

Hudson St  
New York, NY 10014  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Melinda Sharretts  
[melinda.sharretts@diginn.com](mailto:melinda.sharretts@diginn.com)

Broadway  
NY, NY 10001  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Tamer Hamawi  
[tamer@colonienyc.com](mailto:tamer@colonienyc.com)

Main St.  
Napa, CA 94559

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed. You are going to make it impossible for people to afford to run businesses, especially small business owners.

Sincerely,  
Jill dickstein  
[jill.mere@hotmail.com](mailto:jill.mere@hotmail.com)

e 42nd  
Ny, NY 10017  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

On a personal level I agree with paid vacation but small business like ours can absolutely not afford to pay for this on our own. You need to find a way to have the city/state help shoulder the costs. Look around at the vacancy rate. If the goal is to kill independent business, proceed. If the goal is to support small business and give employees needed paid time off, put your heads and resources together and find a compromise where we share the cost of this benefit.

Note as well, when a restaurant employee can not do their shift a replacement person is indispensable to the running of the restaurant, especially at smaller locally owned places like ours, Kashkaval Garden.

Please proceed thoughtfully.

Thanks  
Corey Samuels

Owner  
Kashkaval Garden

Sincerely,  
Corey Samuels  
[corey@kashkaval.com](mailto:corey@kashkaval.com)

9th Avenue  
New York, NY 10019  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Edwin Bellanco  
[edwin@vitaenyc.com](mailto:edwin@vitaenyc.com)

east 46th street  
New York, NY 10017  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Thomas Greco  
[ritzlounge@yahoo.com](mailto:ritzlounge@yahoo.com)

West 46 Street  
New York, NY 10036  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Erick Kontogiannis  
[erickk777@gmail.com](mailto:erickk777@gmail.com)

Columbus  
Ny, NY 10024  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Eddie Steel  
[estih@gmail.com](mailto:estih@gmail.com)

East 61st street  
New York, NY 10065  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Tara Malloy  
[info@thelongroomnyc.com](mailto:info@thelongroomnyc.com)

West 44th Street  
New York, NY 10036  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Fabian von hauske  
[fab@contranyc.com](mailto:fab@contranyc.com)

east 11th street  
New York City, NY 10009  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

As born and raised New Yorker I beg you to Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Mario A Riva  
[mario@carrollplacenyc.com](mailto:mario@carrollplacenyc.com)

Bleecker Street

New York,  
NY  
10012  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Jeremy Marshall  
[chef.aquagrill@gmail.com](mailto:chef.aquagrill@gmail.com)

Spring Street  
New York, NY 10012  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Michael D Droney  
[mdroney@gmail.com](mailto:mdroney@gmail.com)

East 94th Street  
New York, NY 10128  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Andrew Kuruc  
[dkuruc@alicart.com](mailto:dkuruc@alicart.com)

W44th Street  
New York, NY 10036  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
George Kontogiannis  
[erickk777@mac.com](mailto:erickk777@mac.com)

Madison  
Ny, NY 10021  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Noelle Mooney  
[info@stoutnyc.com](mailto:info@stoutnyc.com)

East 41st Street  
New York, NY 10017  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
George Buono  
[gbuono@stmgt.com](mailto:gbuono@stmgt.com)

west 37th  
New York, NY 10018  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Noelle Mooney  
[noelle@stoutnyc.com](mailto:noelle@stoutnyc.com)

West 33rd Street  
New York, NY 10001  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Noelle Mooney  
[mooneynoelle@yahoo.com](mailto:mooneynoelle@yahoo.com)

57th Street  
Woodside, NY 11377  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Nicole Casanova  
[ncasanova@aretskyspatroon.com](mailto:ncasanova@aretskyspatroon.com)

East 46th Street  
New York, NY 10017  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a bar operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Shaun Rose  
[shaun@goldbarnewyork.com](mailto:shaun@goldbarnewyork.com)

Broome Street  
New York, NY 10013  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Are you kidding!?!? We are dying out here!!!! The restaurant business has become no way to make a living. We can't always even pay ourselves as business owners, never mind give the college students that work for us vacation time! We are not Google or Chase. We are a family owned business. Please, be reasonable.

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Karen Babich  
[kbischbab@yahoo.com](mailto:kbischbab@yahoo.com)

137 St  
College Point, NY 11356  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Allyson Ward  
[allyson.ward@hilton.com](mailto:allyson.ward@hilton.com)

south avenue  
staten island, NY 10314  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Dan Pace

Sincerely,

Dan Pace

[dan@zuckershouldings.com](mailto:dan@zuckershouldings.com)

Lexington Ave  
New York, NY 10017  
Constituent

Int 800A = More Vacant Storefronts

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,

Blanca Perez

[b.perez@chefdriven.com](mailto:b.perez@chefdriven.com)

630 9th Avenue Suite 803

New York, NY 10036

Constituent

Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Emigdio Benalcazar  
[ewbh@live.com](mailto:ewbh@live.com)

COURTLAND AVE  
STAMFORD, CT 06906-2301

Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Anne Calimano

Sincerely,  
Hurleys Saloon  
[anne@hurleysnysnyc.com](mailto:anne@hurleysnysnyc.com)

West 48th Street  
New York, NY, NY 10036  
Constituent

Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,

Peter Hampton

[paper2g1@yahoo.com](mailto:paper2g1@yahoo.com)

Main Street  
Flushing, NY 11367  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Sean Tubridy  
[seantubridy83@gmail.com](mailto:seantubridy83@gmail.com)

West 14th Road  
Broad Channel, NY 11693  
Constituent

OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

While I believe the minimum wage increases of the last few years will be good for our city, they have been extremely hard to absorb for businesses like ours. We need time for things to stabilize before we can handle new burdens. As it stands now, there will be significantly less casual full service restaurants in our city, another expense will greatly hasten this demise.

Thank You

Sincerely,  
Robert Guarino  
[r.guarino@5napkinburger.com](mailto:r.guarino@5napkinburger.com)

9th ave  
New York, NY 10036  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Elise Rosenberg  
[info@granelectrica.com](mailto:info@granelectrica.com)

Front St  
Brooklyn, NY 11201  
Constituent

Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Tom Bury  
[twbury@hirdco.com](mailto:twbury@hirdco.com)

40th Street  
Brooklyn, NY 11232  
Constituent

OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

I will add that I grew up in NYC and worked in the industry growing up and even on weekends when I got out of college and was working for Ogilvy and Mather at an entry level position. Ogilvy gave me one weeks vacation after 1 year and two weeks after 2 years. This is what we currently do with all our employees at my restaurants. I think this is more than fair and worked for me when I was an employee. I knew I had to work hard if I wanted more.

Sincerely,  
Martin Whelan  
[mpw212@gmail.com](mailto:mpw212@gmail.com)

44th Dr, PHE  
Long Island City, NY 11101  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A.

As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us.

All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. With the additional costs of operating we will no longer be able to afford to continue to operate our restaurants. Additionally the staff that is motivated and looking to move up gets hurt as there is zero incentive to become a manager as they feel slighted when someone without any experience can get the same pay, benefits etc. without earning it. I have managers who are making 6 figures but either we will forced to automate cutting jobs dramatically or we will be forced to close down. I truly believe that things have progressed to much too quickly and the results will be devastating for the city. When employees inform us that they cant work over a certain amount of hours because they will lose their housing then the system is broken.

Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Paul Goodman  
[paul@goodmanmcd.com](mailto:paul@goodmanmcd.com)

Flatbush Avenue  
Brooklyn, NY 11226  
Constituent

Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Kristofer Polak  
[kris@blueribbonrestaurants.com](mailto:kris@blueribbonrestaurants.com)

sullivan street  
New York, NY 10012  
Constituent

Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it untenable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

I will likely have to close my business if this legislation passes.

Sincerely,  
John Tucker  
[john@rosewater.nyc](mailto:john@rosewater.nyc)

Union Street  
Brooklyn, NY 11215  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Vanessa cantor  
[cantor.v@gmail.com](mailto:cantor.v@gmail.com)

Onderdonk Avenue  
Ridgewood, NY 11385  
Constituent

Say NO to Int 800A

Dear Hearings,

I have been a New Yorker my entire life. Having been born only 10 blocks from where I reside. I am disappointed in the direction the City is going. I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Carolyn Richmond  
[cr1991@mac.com](mailto:cr1991@mac.com)

East 87th Street  
New York, NY 10128  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Leslie Ferrier  
[lferrier@momofuku.com](mailto:lferrier@momofuku.com)

E 11th St  
New York, NY 10003-6009  
Constituent

Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Jeffrey Brosi  
[tavernnyc@gmail.com](mailto:tavernnyc@gmail.com)

207th Street  
BAYSIDE, NY 11360  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Michael Staff  
[theginmill@nycbestbars.com](mailto:theginmill@nycbestbars.com)

AMSTERDAM AVE.  
NEW YORK, NY 10024  
Constituent

Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Jeremy Spector  
[spectorspec@gmail.com](mailto:spectorspec@gmail.com)

east 10th st  
Ny, NY 10009  
Constituent

Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Gail Klein  
[galkay@aol.com](mailto:galkay@aol.com)

East 14th Street  
New York, NY 10003  
Constituent

OPPOSE Int 800A

Dear Hearings,

Look around. How many small, owner-operated bars and restaurants do you see? Not the chains. Not the ones backed by status-seeking hedge fund owners. Regular bars and restaurants owned by regular people. Probably a LOT fewer than there were even 10 years ago. That's because we can't survive the present over-regulated environment!

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another "positive sounding" mandate on my business that will have negative consequences for us, and then ask what you can do to save our city's dying small businesses.

Sincerely,  
Amy McCloskey  
[amy@madamex.com](mailto:amy@madamex.com)

West Houston St.  
New York, NY 10012  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Eytan Benyamin  
[ebenyamin@gmail.com](mailto:ebenyamin@gmail.com)

netherlands  
Bx, NY 10463  
Constituent

Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Donald FitzGerald  
[don@rpdtinc.com](mailto:don@rpdtinc.com)

N. Crescent Drive  
Beverly Hills, CA 90210

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
David Chiong  
[nyctacos@gmail.com](mailto:nyctacos@gmail.com)

East 117th Street  
New York, NY 10035  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, we operate on extremely thin margins. The proposed law mandating that we pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on the business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Madeline Quirico  
[madeline@amysbread.com](mailto:madeline@amysbread.com)

University Avenue  
Bronx, NY 10468  
Constituent

Say NO to Int 800A

Dear Hearings,

I can Not believe this is even an option or a discussion. Shall we make all small business owners bankrupt in this city? Maybe stop giving lazy people free rides! What a shame. The city has strangled businesses and its just getting worse by the hour! please stop! I've been trying so hard for 30 years to make a good living and now I work to keep my employees employed. NYC has made people stop looking for work because they get so many benefits without working. Teach our children more about work ethic stop handing out our hard earned money!

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Dianna Loiselle  
[dianal@tellystaverna.com](mailto:dianal@tellystaverna.com)

21st street  
astoria, NY 11105  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

How do u expect small business to stay open..over 30 percent of retail is vacant .

Sincerely,  
peter gevrekis  
[peter@desnudany.com](mailto:peter@desnudany.com)

south 1st street  
brooklyn, NY 11211  
Constituent

Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Burak Karacam  
[burakk@pera-soho.com](mailto:burakk@pera-soho.com)

Thompson Street  
New York, NY 10012  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Rob Cookston

[rob.cookston@teamcookston.net](mailto:rob.cookston@teamcookston.net)

W 23rd Street  
New York, NY 10011  
Constituent

Support Small Biz Oppose Int 800A

Dear Hearings,

I operate a restaurant in Midtown East. For several years, I have been a loud and public voice for increased wages, rights and benefits for workers (see e.g. Crains, NYT). We have always paid well above market in wages and benefits.

At some point though, I have to ask myself if NYC is trying to kill off independent restaurants not backed by Related. It seems at every turn, this Mayoral administration increases regulations and costs with no corresponding give to encourage small business.

No wonder every restauranteur I speak to wants to expand OUTSIDE of the five boroughs - something we already did after 30 years of owning restaurants solely in Manhattan.

If you want to turn NYC into a playground for the rich, this is another solid step in that direction because our first step will be to raise prices (again). It also kills me as a small business person because by regulating these benefits, you effectively stripped us of one of the few competitive advantages we had over private equity backed restaurants.

Sincerely,

James Mallios

Sincerely,  
James Mallios  
[james@amalinyc.com](mailto:james@amalinyc.com)

East 57th Street  
New York, NY 10022  
Constituent

OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Jennifer Elliott  
[jennifer.elliott@greatperformances.com](mailto:jennifer.elliott@greatperformances.com)

Hudson St  
New York, NY 10013  
Constituent

OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Kirby Chin  
[kcnycny2000@hotmail.com](mailto:kcnycny2000@hotmail.com)

Warren Street  
New York, NY 10282  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Spiro Sfaelos  
[ssfaelos@gmail.com](mailto:ssfaelos@gmail.com)

30th street apt  
Astoria, NY 11106  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
SUSANNAH KOTEEN  
[susannah@lidoharlem.com](mailto:susannah@lidoharlem.com)

Frederick Douglass Blvd  
New York, NY 10026-2001  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a business owner in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Karen DiPeri

[kdiperi@hmgplus.com](mailto:kdiperi@hmgplus.com)

West 37th Street  
New York, NY 10018  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Brad Grossman

[bgrossman7@gmail.com](mailto:bgrossman7@gmail.com)

Yellowstone Blvd  
Forest Hills, NY 11375-2353  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,

Alex Perez

[aperez@freshandco.com](mailto:aperez@freshandco.com)

West 37th Street  
New York, NY 10018  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
WAGEH S KHOZAM  
[wagehkhuzam@yahoo.com](mailto:wagehkhuzam@yahoo.com)

lorraine loop  
Staten Island, NY 10309  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Andrew Schnipper

[andrew@schnippers.com](mailto:andrew@schnippers.com)

Lexington Avenue  
New York City, NY 10017  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
George Tolos  
[240@cafemetryny.com](mailto:240@cafemetryny.com)

w 35  
Manhattan, NY 10001  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Yeri Jimenez  
[brooklynmetro@cafemetry.com](mailto:brooklynmetro@cafemetry.com)

15 metro tech  
Brooklyn, NY 11201  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Sam Elzoghby  
[1221@cafemetryn.com](mailto:1221@cafemetryn.com)

Cafe metro 1221 6 Ave  
NY, NY 10020  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Janet Goya  
[jgny1536@hotmail.com](mailto:jgny1536@hotmail.com)

E29 St  
Brooklyn, NY 11235  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Rehana haque  
[1211@freshandconyc.com](mailto:1211@freshandconyc.com)

6th ave  
Nyc, NY 10036  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Adrian Zavala  
[zavala184@yahoo.com](mailto:zavala184@yahoo.com)

105th St  
Corona, NY 11368  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

Dina tolos

[grkdinomite@aol.com](mailto:grkdinomite@aol.com)

Fairview ave  
Englewood Cliffs, NJ 07632

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Yianni Tolos  
[yiannitolos@gmail.com](mailto:yiannitolos@gmail.com)

Fairview ave  
Englewood Cliffs, NJ 07632

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Omar motair  
[omarmotair@aol.com](mailto:omarmotair@aol.com)

Whitehall street  
New York, NY 10004  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Dimitri Kalognomas  
[dkalognomas@aol.com](mailto:dkalognomas@aol.com)

Oak Street  
Ridgefield, NJ 07657

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,

John Koumpourlis

[yiannik@optonline.net](mailto:yiannik@optonline.net)

Wellington Road  
Greenvale, NY 11548  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Jason Konidaris  
[konidaris.j@gmail.com](mailto:konidaris.j@gmail.com)

North central road  
Fort lee, NJ 07024

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Chris Zamfotis  
[czamfotis@gmail.com](mailto:czamfotis@gmail.com)

Roff Ave  
Palisades Park, NJ 07650

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Panayiotis Boyiakia  
[peterboyiakis@gmail.com](mailto:peterboyiakis@gmail.com)

Colony Lane  
Manhasset, NY 11030  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,

stephanie sfaelos

[stephanie.sfaelos@gmail.com](mailto:stephanie.sfaelos@gmail.com)

horizon road 802  
fort lee, NJ 07024

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Serafim Tolos  
[fim.tolos@gmail.com](mailto:fim.tolos@gmail.com)

Kamena St  
Fairview, NJ 07022

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Kosta Zamfotis  
[kostazamfotis@gmail.com](mailto:kostazamfotis@gmail.com)

4th Street  
Palisades Park, NJ 07650

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Kostas lambris  
[kostaslambros@westsidebake.com](mailto:kostaslambros@westsidebake.com)

w38 th st  
Manhattan, NY 10018  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,

Hector v

[hvargas@cafemetryn.com](mailto:hvargas@cafemetryn.com)

east 3rd street  
Brooklyn, NY 11218  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Gus Toxqui  
[gtox33@gmail.com](mailto:gtox33@gmail.com)

Broadway  
Nyc, NY 10018  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
Beneriff Polanco  
[benny@freshandconyc.com](mailto:benny@freshandconyc.com)

95th th st  
Jackson heights, NY 11372  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Spyros Kokkosis  
[spirokokkosis@gmail.com](mailto:spirokokkosis@gmail.com)

W 50th Street  
New York, NY 10019  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
george tenedios  
[gt@freshandconyc.com](mailto:gt@freshandconyc.com)

west 37th street  
new york, NY 10018  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Bill Lerner  
[billylerner@yahoo.com](mailto:billylerner@yahoo.com)

West 13th Street  
New York, NY 10011  
Constituent

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,

Shane chrystral

[shanechrystral@gmail.com](mailto:shanechrystral@gmail.com)

60th Dr  
Maspeth, NY 11378  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Pat Tolos  
[ptolos@aol.com](mailto:ptolos@aol.com)

Fairview Ave  
Englewood Cliffs, NJ 07632

Re: Int 800A = More Vacant Storefronts

Dear Hearings,

I'm writing to you as a restaurant/bar operator in your district urging you to OPPOSE Int 800A, which would require that I give 2 weeks of paid time off to all employees, in addition to the 1 week of paid leave I'm already currently required to give my employees. I understand the positive intent of this legislation, but our elected representatives are making it unbearable to run a local business with the constant mandates. There are already enough vacant storefronts around the city and workers who are having their hours and jobs cut. Please don't support Int 800A and make it even harder to keep my doors open and keep New Yorkers employed.

Sincerely,  
Paul Seres  
[paul@helioshospitality.com](mailto:paul@helioshospitality.com)

Delancey Street  
New York, NY 10002  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Rami mot  
[rami@flavorsnyc.com](mailto:rami@flavorsnyc.com)

27 Whitehall  
Ny, NY 10004  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Kathy Tuchman  
[kathytuchman@aol.com](mailto:kathytuchman@aol.com)

Central Park West  
New York, NY 10025  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Philippe Massoud  
[philippe@ililnyc.com](mailto:philippe@ililnyc.com)

5th Avenue  
New York, NY 10001  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,  
Simon Oren  
[danaoren@aol.com](mailto:danaoren@aol.com)

E 79TH ST  
NEW YORK, NY 10075  
Constituent

Re: OPPOSE Int 800A

Dear Hearings,

Please OPPOSE Int 800A because it will only make it more challenging to run a restaurant in your district, and more expensive for everyday people to eat out. I urge you to support small businesses and the jobs they create by OPPOSING Int 800A. Please do not pose another “positive sounding” mandate on my business that will have negative consequences for us, and then ask what you can do to save our city’s dying small businesses.

Sincerely,  
mario dibiase  
[msdibiase@gmail.com](mailto:msdibiase@gmail.com)

Armstrong Ave  
Staten Island, NY 10308-3147  
Constituent

Re: Support Small Biz Oppose Int 800A

Dear Hearings,

Please OPPOSE Int 800A. As a restaurant operator in your district, I operate on extremely thin margins. The proposed law mandating that I pay employees an additional 2 weeks of paid time off a year plus the cost of replacing that shift would pose a significant financial burden on my business. Not to mention, nights, weekends, and holidays are times when people most want to take paid time off, BUT I operate a service business and these are the busiest times for us. All of these 100% employer-funded mandates, one after another, are too much for local businesses to afford and manage. Please OPPOSE Int 800A and support small businesses and jobs.

Sincerely,

John Lin

[zoomjlin9@gmail.com](mailto:zoomjlin9@gmail.com)

Monroe St.  
New York, NY 10002  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Emily Elsen  
[emily@birdsblack.com](mailto:emily@birdsblack.com)

Sackett Street  
Brooklyn, NY 11217  
Constituent

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Bill Bonbrest  
[bill.bonbrest@taogroup.com](mailto:bill.bonbrest@taogroup.com)

Avenue of Americas  
New York, NY 10019  
Constituent



## **Testimony on the Benefits of Adding Personal Time Mandate to Paid Sick Leave Ordinance**

**Hearing of the Civil Service and Labor Committee of the New York City Council**  
**May 28, 2019**

**Dr. Dean Baker, Senior Economist**  
**Center for Economic and Policy Research**

---

I want to thank Chair Daneek Miller and the committee for the opportunity to provide testimony on this important amendment to the city's paid sick leave ordinance. The proposal to add mandated personal time to the city's ordinance on paid sick leave is an important measure that is likely to be a precedent for states and cities across the United States, and hopefully will eventually be incorporated into national legislation.

The United States is an outlier among wealthy countries in not guaranteeing its workers any amount of paid time off. This measure will be a huge step for ensuring that New York City's workers can enjoy some paid time off, which will almost certainly be followed by similar measures elsewhere.

As background for this proposal, it is necessary to recognize the importance of increased leisure as a demand by workers ever since the industrial revolution. In the 19th century and into the 20th century, a major demand of workers in the United States and around the world was for an eight-hour workday, as opposed to the twelve or even fourteen-hour workdays that were common in factories in that era. In fact, the famous May 1, 1886 protest in Chicago, which became the basis for celebrating May 1 as an International Workers' Day, was a protest for an eight-hour workday.

While the battle for a shorter workday was a long one, workers in the United States eventually were successful. The Fair Labor Standards Act (FLSA), which was passed in 1937, both created the first national minimum wage and also set the forty-hour workweek as the new standard. The FLSA required that workers who put in more than forty hours a week would be paid an overtime premium of 50 percent of their normal wage. This both discouraged employers from demanding long hours and also ensured that workers would at least gain some compensation if their excess hours.



Testimony, Dean Baker, CEPR  
May 28, 2019

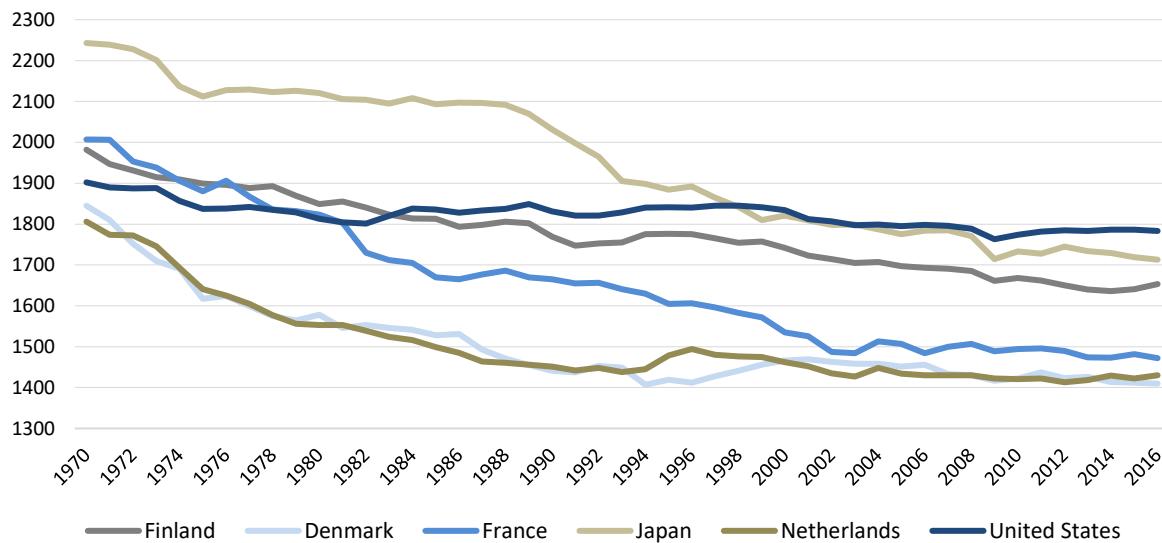
Although the forty-hour work week was a big victory for the labor movement, there was no obvious reason that work time would be frozen at this level. The logic of economic growth is that increasing productivity allows workers to enjoy higher living standards. Typically, they choose to take the benefit of higher productivity in part in the form of higher pay and material living standards and part in the form of more leisure time. (Unfortunately, many workers have not shared in the gains of productivity growth over the last four decades. This trend must also be reversed.)

If we look at other wealthy countries, there has been a large decline in the length of the average work year over the last five decades. This has not been true in the United States. **Figure 1** shows the trend in average annual hours since 1970 and five other major wealthy countries. As can be seen in 1970, the United States was closer to the bottom than the top among this group, with a higher average number of hours than Denmark and the Netherlands, but fewer hours than Finland, France, and Japan.

Over the next five decades, the picture changes dramatically. In 1970, workers in the United States had put in on average 3 to 5 percent more hours than workers in Denmark and Finland, according to the OECD data, by 2016, this difference had grown to more than 25 percent. Workers in France and the Netherlands now have considerably shorter average work years than workers in the United States. Even workers in Japan now work about 5 percent less on average than workers in the United States.

Testimony, Dean Baker, CEPR  
May 28, 2019

**FIGURE 1**  
**Average Annual Hours of Work, 1970 – 2016**



Source: Organization for Economic Cooperation and Development (OECD). 2018. "Hours Worked."  
<https://data.oecd.org/emp/hours-worked.htm>.

The fact that all other wealthy countries reduced their work hours and the United States did not to any substantial extent was not just an accident. In other countries, benefits like health care and pensions are largely provided by the government. In contrast, in the United States, health care insurance and pensions have been provided primarily by the employer. Both health care insurance and traditional defined-benefit pensions are substantial expenses that are viewed by employers as largely per worker overhead costs. This gave employers a strong incentive to require workers to put in more hours each year rather than allowing for shorter hours per worker and hiring more workers.

This incentive structure has changed somewhat now that traditional defined-benefit pensions are becoming increasingly rare. It is also now common for employers to pro-rate the portion of a health insurance benefit that they pay. Nonetheless, the historical impact of this structure cannot be reversed overnight. This is one reason it is good policy for government to take active measures like the current proposal for mandated personal time. For decades we had in place a benefit structure that provided

Testimony, Dean Baker, CEPR  
May 28, 2019

an incentive for employers to favor longer hours, it is reasonable that government takes steps to try to reverse an important unintended effect of its policy on pension and health care insurance.

There will be some objections that this proposal will be a major burden on employers. This claim is simply not realistic. Even if the cost of the mandate is fully borne by employers, it only raises their labor costs by 3.0 percent. The countries that guarantee workers paid time off have not suffered as a result. For the unemployment rate in Germany and the Netherlands, both countries where workers are guaranteed four weeks a year of vacation, are 3.2 percent and 3.3 percent, respectively.<sup>1</sup> Flipping it over and looking at employment-to-population-rates for prime-age workers (the share of people between the ages of 25 and 55 who are working), these and other OECD countries have considerably higher employment-to-population-rates than the United States.<sup>2</sup>

Furthermore, we know that most employees already receive paid vacation. A new analysis from the Center for Economic and Policy Research found that 77 percent of all workers receive paid vacation, while 78 percent enjoy some number of paid holidays.<sup>3</sup> These benefits are strongly skewed towards higher-end workers, with 91 percent of the top quartile of wage earners having paid vacation days and 93 percent having paid holidays. The shares for the bottom quartile of the wage distribution are 52 percent and 54 percent for paid vacation and paid holidays, respectively.

The proposal before the Council will be to a large extent just providing some degree of equalization, with the workers at the bottom end of the wage distribution enjoying a benefit that higher paid workers, with more bargaining power, have long enjoyed. In this respect, it is also worth noting that the vast majority of workers represented by unions enjoy some amount of paid vacation and/or paid holidays.

---

<sup>1</sup> Organization for Economic Co-operation and Development (OECD). 2019. "Harmonised unemployment rate." <https://data.oecd.org/unemp/harmonised-unemployment-rate-hur.htm>.

<sup>2</sup> For a systematic assessment of the impact of labor market regulations, such as paid time off, on employment, see Howell, David R. et al. 2006. "Are Protective Labor Market Institutions Really at the Root of Unemployment? A Critical Perspective on the Statistical Evidence." Washington, DC: Center for Economic and Policy Research. [http://cepr.net/documents/2006\\_07\\_unemployment\\_institutions.pdf](http://cepr.net/documents/2006_07_unemployment_institutions.pdf).

<sup>3</sup> Maye, Adewale. 2019. "No-Vacation Nation, Revised." Washington, DC: Center for Economic and Policy Research. May. <http://cepr.net/images/stories/reports/no-vacation-nation-2019-05.pdf>.



Testimony, Dean Baker, CEPR  
May 28, 2019

In short, this proposal for paid personal time is a major step toward reversing a historical accident that has distinguished the United States from all other wealthy countries in not providing a guarantee of paid time off to its workers. As similar legislation is adopted elsewhere we can look to a situation in which workers will again divide the gains of productivity growth between higher income and more leisure, as they do elsewhere, and they had largely done in the United States until the overhead costs of benefits made leisure too expensive to employers.

**Committee on Civil Service and Labor**

**Hearing: Int. No. 800-A – May 28, 2019**

**Testimony: Dawn Casale**

Dear City Council, Committee on Civil Service and Labor:

My name is Dawn Casale. My husband and I own One Girl Cookies with three locations in Brooklyn. We have been serving our communities coffee, cakes and other baked goods since 2005. I am submitting this testimony because I oppose Int 800A, proposed paid vacation legislation and appreciate this opportunity to elaborate on why.

I am writing today not only as a business owner, but as a small business customer. As someone who loyally patronizes the small businesses in my community. I don't buy my food or shoes or books online. I buy them from wonderful businesses owned by real people. Passionate people who work hard, care deeply and deserve success in this city.

And I am one of those people. My business has been making birthday cakes for kids, donating to local schools & organizations and acting as a center of our communities for almost 14 years. Beyond that, we provide a great place to work. We have thirty six employees and we truly care about each and every one of them. I want to state clearly that this is not at all about whether my employees deserve paid vacation. I wholeheartedly think they do. And many Councilmembers agree. The question is how will my business receive help so that we can realistically offer it?

I firmly believe that we can work together to come up with a relief package for small businesses. Within my own community of peers we have developed a list of incentives and support including:

- 1) owner led trainings that are effective and robust so that individuals emerge with the appropriate hard skills as well as important and needed soft skills
- 2) payroll subsidies for employers offering apprenticeships and mentoring so that employees lacking skills are hirable and employers can afford to teach them useful skills
- 3) tax credit for commercial tenants on real estate taxes
- 4) creation of insurance groups for reduced rates
- 5) remuneration for businesses in construction zones/under scaffolding

- 6) shifting the culture of city agencies to focus more on education, less on penalizing
- 7) effective ways to communicate from city agencies to the business community so that we can keep up with ever changing mandates
- 8) tax incentives for landlords with favorable leasing terms for small businesses
- 9) an overhaul of the way DOH operates, including a gold star system for businesses that consistently meet DOH regulations and have consistent clean records
- 10) a seat at the table vis a vis industry specific advisory groups comprised of a cross section of business owners that represent varying sized businesses, diverse neighborhoods, etc...

In the past three years there has been much more asked of small businesses and this newest legislation will be the tipping point for many of them. We must work on creating an environment of reciprocity, of give and take and of mutual support if small businesses in New York City are to not only survive, but succeed. An important distinction must be made between survival and success. The goal should not be mere survival, holding on by a thread and barely making ends meet. At the end of the day, that will not be enough to encourage owners to keep their doors open. Each and every day endless challenges exist in running our businesses so just getting by is just not cutting it. There must be a shared goal of financial success that results in operating businesses from a place of abundance rather than scarcity. This would result in a win for all involved.

For retail and hospitality businesses, when one employee is out on vacation her shifts must be covered by another. We are in the unfortunate circumstance of essentially "paying double". As a result, this legislation will cost my company tens of thousands of dollars a year. The fact is that I would much rather give our money to our hard working, deserving employees rather than city agencies, my landlord, and my insurance providers. However, since that money all comes from the same modest sized bucket, it is not financially feasible.

It is no secret that the brick and mortar community is already under siege from online retailers. By voting for this legislation you are essentially holding the hammer that will nail the coffin shut for many businesses. Some of these businesses may even be in your own communities. I urge you to think about how this legislation will affect the people that own some of your favorite establishments.

Small businesses are in danger of shuttering because our city has sent a clear message that we are not welcome here. We have all heard about how small businesses are the backbone of our city and so vital to what makes New York unique. But these are words. I, and likely many other business owners are not feeling valued. Not feeling like our city is a partner in our success. Undervaluing small businesses is a very shortsighted proposition because successful small businesses mean successful communities.

Voting for this legislation without putting any protective measures in place for small businesses is put simply, irresponsible. That YES vote will make any future lament for the loss of a culture of independent businesses hypocritical. We may never complain about vacancy rates. We cannot feel dismayed by communities filled with big box stores and void of mom and pop establishments. Being distraught over such a retail landscape would be wrong because the conditions we are creating will have been responsible for that result.

Respectfully yours,

Dawn Casale

--

Dawn Casale

Founder

One Girl Cookies

Brooklyn, New York



**Council of the City of New York  
Committee on Civil Service and Labor**

**Intro 800 – A**

**Tuesday, May 28, 2019**



**Testimony:** Dan Biederman, President

34<sup>th</sup> Street Partnership

Bryant Park Corporation

1065 Avenue of the Americas, Suite 2400, New York, NY 10018

Tel: 212-719-3434

The 34<sup>th</sup> Street Partnership and the Bryant Park Corporation, affiliated privately-funded business improvement corporations in midtown Manhattan, have long offered paid vacation time to our employees. This proposed legislation greatly expands the universe of actions that could potentially lead to frivolous claims and expensive litigation for our companies. It lowers the bar for evidence and ability to substantiate false claims against us. It also dramatically raises fines for companies of our size who could incur a penalty of \$500 for each employee. Lastly, the legislation would empower the city's Corporation Counsel to initiate civil actions against employers in violation of the law. Civil penalties could be imposed for up to \$15,000 for employers, and \$500 for each employee. Where the current law provides for a complaint-based system, the proposed fines are too harsh and should be reconsidered.

We respectfully ask the committee to consider working with our companies, as well as with the New York City BID Association, to provide for a better package of benefits for our employees.

Thank you.



**TESTIMONY BEFORE NEW YORK CITY COUNCIL  
COMMITTEE ON CIVIL SERVICE AND LABOR**

**JESSICA WALKER  
PRESIDENT & CEO**

**TUESDAY, MAY 28, 2019**

Good morning. My name is Jessica Walker and I am the President and CEO of the Manhattan Chamber of Commerce. The Chamber is a community of businesses – including startups, solo entrepreneurs, small businesses and large companies – that help one another succeed.

Intro 800-A would require New York City businesses with five or more employees to provide two weeks of paid vacation to both full-time and part-time employees. This bill would have dire consequences for New York City businesses; especially those already struggling to adapt to the plethora of costly new regulations foisted upon them in the last 24 months.

Small business owners certainly do not want to eliminate jobs. But the reality is that local regulations have so fundamentally altered the way that businesses operate here that employers often have no choice but to eliminate some positions in order to stay afloat.

Consider just a few of the mandates recently imposed on local businesses:

New York's minimum wage has increased every year since 2013, reaching \$15 an hour for most businesses in the city this year. This has been difficult for some to absorb because government has implemented other costly mandates at the same time.

In May 2013, the New York City Council passed legislation requiring employers with 20 or more workers to provide at least five days of paid sick leave. The following year the law was expanded to capture small businesses with as few as five employees.

In 2016, New York State's Paid Family Leave Act was adopted, requiring businesses of all sizes to accommodate up to 10 weeks of paid leave for employees to care for a new child, care for family members that are ill, or assist loved ones when a family member is deployed abroad on active military duty.

These are all incredibly important initiatives, but the truth is that someone has to pay for them.

When the Manhattan Chamber of Commerce surveyed our members last year, small businesses cited the high cost of doing business in New York as the thing most negatively affecting them. Yet instead of helping small businesses compete more effectively, policymakers

have signaled that more costly mandates - like the paid leave proposal currently under consideration - are on the way.

Is it any wonder that small businesses don't feel that local government has their back?

If compliance with the law imposes perpetually-increasing costs of operation, businesses simply cannot raise prices at a rate that consumers will accept. Consequently, business owners are forced to cut costs wherever possible, including jobs. The paid leave proposal before you today would only further exacerbate the tremendous costs imposed on New York City businesses.

Large companies almost universally provide paid time off for their employees. So it is New York's small- and medium-sized businesses that would suffer under Intro 800-A. For businesses at or near the five-employee threshold, this law would impose especially significant compliance costs, and employers would likely be forced to either cut staff or transition workers from permanent employees to freelancers.

In addition, compliance with the current paid safe and sick leave mandate amounts to five paid days off. The new paid vacation mandate would increase this to three weeks, which is a significant addition to payroll even without accounting for the cost of replacement labor to cover for absent employees. For many retail and service businesses, rising rents and online competition are already threatening their survival and the significant costs of new employee benefits cannot be absorbed. The Council has demonstrated sympathy for taxi drivers who have been driven to desperation by over-regulation and competitive forces and we hope that you will not need to see the same hopelessness play out among other local entrepreneurs before taking remedial action.

The Chamber supports good-faith solutions to support New York City workers and to sustain economic growth and job creation, but those solutions cannot be at the expense of local businesses. If lawmakers truly want to protect jobs, they must give regulatory relief to the businesses that provide those jobs and stop pretending that they can have it both ways.

Implementing a two-week paid vacation requirement would hurt local businesses, the employees they support and the communities they call home. On behalf of the Manhattan Chamber of Commerce and our members, I urge the Committee on Civil Service and Labor to consider the full impacts of this legislation and oppose the paid vacation mandate under Intro 800-A. Thank you.

May 24, 2019

New York City Council  
City Hall  
New York, NY 10007

**RE: May 28, 2019 Committee on Civil Service and Labor Hearing on Mayor de Blasio's Paid Leave Proposal (Int. No. 800-A)**

Dear Members of the New York City Council:

On January 9, 2019, Mayor Bill de Blasio announced a proposal that would require New York City businesses with five or more employees to provide two weeks of paid vacation to both full-time and part-time employees. We hope you will carefully consider business concerns about the potential negative impact of his proposal before moving legislation forward in the Council.

In the last 24 months, New York City businesses have weathered a barrage of new state and city benefit mandates such as paid sick, safe and family leave as well as new regulations requiring sexual harassment education and restricting employee scheduling. All of these add to the high costs of creating jobs and operating a business here. At the same time, we are adjusting to minimum wage requirements that have increased every year since 2013 and, for the smallest businesses, will increase yet again at the end of 2019. Many vulnerable businesses are also facing the elimination of the tip credit, which will dramatically increase payroll costs.

Some of these new government mandates have been justified and contribute to ensuring the safety, health and basic human rights of New Yorkers; but many are clearly a response to political pressure and reflect the fact that business owners have far less influence than organized labor and other activist groups. We assure you that the empty storefronts that are increasingly visible around the city are not simply a result of rising rents, but equally due to the increased difficulty for businesses with thin margins to survive in the over-regulated environment that New York has become.

Large companies almost universally provide paid time off for their employees. New York's small- and medium-sized businesses will bear the burden of the Mayor's vacation mandate. For businesses at or near the five-employee threshold, this law would impose significant compliance costs, and would likely force employers to either cut staff or transition workers from permanent employees to freelancers. Typically, jobs that do not offer vacation are high-turnover, temporary, or part-time positions where employers are spending on recruiting and training workers who do not stay with them long enough to generate a return on investment. Allowing them to take vacation days will only increase the losses that employers experience at this end of the job market.

Compliance with the paid safe and sick leave mandate already amounts to five paid days off and the Mayor's vacation mandate would increase this to three weeks, which is a significant addition to payroll. There is also a cost of hiring replacement labor to cover for absent employees. For many retail and service businesses, rising rents and online competition are already threatening their survival and the significant costs of new employee benefits cannot be absorbed. The Council has demonstrated sympathy for taxi drivers who have been driven to desperation by over-regulation and competitive forces and we hope that you will not need to see the same hopelessness play out among other local entrepreneurs before taking remedial action.

We support good-faith, smart solutions to support New York City workers and to sustain economic growth and job creation. Implementing a two-week paid vacation requirement would do the exact opposite, hurting local businesses, the employees they support and the communities they call home. We urge you to reject a vacation mandate and signal that at least some of their elected leaders understand and support the city's struggling entrepreneurs and small business owners.

Thank you for your consideration.

Sincerely,

Bronx Chamber of Commerce

Food Industry Alliance of New York State, Inc.

Manhattan Chamber of Commerce

NYC Hospitality Alliance

New York State Restaurant Association

Partnership for New York City

Queens Chamber of Commerce

Real Estate Board of New York

Staten Island Chamber of Commerce

**Committee on Civil Service and Labor**  
**Hearing: Int. No. 800-A – May 28, 2019**  
**Testimony: Michele Pravda**

Dear City Council, Committee on Civil Service and Labor:

My name is Michele Pravda. My husband and I own Smith & Vine a local Carroll Gardens wine shop and Stinky Bklyn, a cheese & specialty food shop in Cobble Hill/Boreum Hill Brooklyn. We have been selling wine & spirits in our beloved community since 2004 and cheese & specialty food since 2006. I am submitting this testimony because I oppose Int 800A, proposed paid vacation legislation and appreciate this opportunity to elaborate on why.

I am writing today not only as a business owner, but as a small business customer. As someone who loyally patronizes the small businesses in my community. I don't buy my food or shoes or books online. I buy them from wonderful businesses owned by real people. Passionate people who work hard, care deeply and deserve success in this city.

And I am one of those people. My business has been supplying our neighborhood with the "good & tasty stuff" to share with family and friends, donating to local schools & organizations and acting as a center of our communities for 15 years. Beyond that, we provide a great place to work. We have Twenty employees and we truly care about each and every one of them. I want to state clearly that this is not at all about whether my employees deserve paid vacation. I wholeheartedly think they do. And many Council members agree. The question is how will my business receive help so that we can realistically offer it?

I firmly believe that we can work together to come up with a relief package for small businesses. Within my own community of peers we have developed a list of incentives and support including:

- 1) owner led trainings that are effective and robust so that individuals emerge with the appropriate hard skills as well as important and needed soft skills
- 2) payroll subsidies for employers offering apprenticeships and mentoring so that employees lacking skills are hirable and employers can afford to teach them useful skills
- 3) tax credit for commercial tenants on real estate taxes
- 4) creation of insurance groups for reduced rates
- 5) remuneration for businesses in construction zones/under scaffolding
- 6) shifting the culture of city agencies to focus more on education, less on penalizing
- 7) effective ways to communicate from city agencies to the business community so that we can keep up with ever changing mandates
- 8) tax incentives for landlords with favorable leasing terms for small businesses

9) an overhaul of the way DOH/DOA operates, including a gold star system for businesses that consistently meet DOH/DOA regulations and have consistent clean records

10) a seat at the table vis a vis industry specific advisory groups comprised of a cross section of business owners that represent varying sized businesses, diverse neighborhoods, etc...

In the past three years there has been much more asked of small businesses and this newest legislation will be the tipping point for many of them. We must work on creating an environment of reciprocity, of give and take and of mutual support if small businesses in New York City are to not only survive, but succeed. An important distinction must be made between survival and success. The goal should not be mere survival, holding on by a thread and barely making ends meet. At the end of the day, that will not be enough to encourage owners to keep their doors open. Each and every day endless challenges exist in running our businesses so just getting by is just not cutting it. There must be a shared goal of financial success that results in operating businesses from a place of abundance rather than scarcity. This would result in a win for all involved.

For retail and hospitality businesses, when one employee is out on vacation her shifts must be covered by another. We are in the unfortunate circumstance of essentially "paying double". As a result, this legislation will cost my company tens of thousands of dollars a year. The fact is that I would much rather give our money to our hard working, deserving employees rather than city agencies, my landlord, and my insurance providers. However, since that money all comes from the same modest sized bucket, it is not financially feasible.

It is no secret that the brick and mortar community is already under siege from online retailers. By voting for this legislation you are essentially holding the hammer that will nail the coffin shut for many businesses. Some of these businesses may even be in your own communities. I urge you to think about how this legislation will affect the people that own some of your favorite establishments.

Small businesses are in danger of shuttering because our city has sent a clear message that we are not welcome here. We have all heard about how small businesses are the backbone of our city and so vital to what makes New York unique. But these are words. I, and likely many other business owners are not feeling valued. Not feeling like our city is a partner in our success. Undervaluing small businesses is a very shortsighted proposition because successful small businesses mean successful communities.

Voting for this legislation without putting any protective measures in place for small businesses is put simply, irresponsible. That YES vote will make any future lament for the loss of a culture of independent businesses hypocritical. We may never complain about vacancy rates. We cannot feel dismayed by communities filled with big box stores and void of mom and pop establishments. Being distraught over such a retail landscape would be wrong because the conditions we are creating will have been responsible for that result.

Respectfully yours,

Michele Pravda

**Committee on Civil Service and Labor**  
**Hearing: Int. No. 800-A – May 28, 2019**  
**Testimony: Renato Poliafito**

Dear City Council, Committee on Civil Service and Labor:

I would like to address the issue of paid vacation for hourly employees.

I am one of the founders of Baked, a coffeeshop and bakery. for our hourly employees, we usually hire young kids out of school and train them as baristas. They tell us the number of hours they want to work, when they can work, and usually have total control of their schedule. They frequently say things like "I need to take next week off." for example, and I have to find coverage for them.

Now you are suggesting they get paid for the time off they suddenly are asking for?

This isn't a salaried position. I have no issue with giving an employee who puts in 40 hours a week earn vacation time over the course of a year. These hourly employees sometimes work 20 hours a week, sometimes 5. To suddenly have them earn vacation hours on top of the hours they work (on top of sick days) and then find someone to cover for them when they decide to take vacation, effectively paying two employees when one is working to cover for them will raise our already astronomical labor costs thru the roof and honestly- it's already a challenge to operate as it is. An employee can easily take advantage of this, taking a full three weeks of paid time off. If every employee did that, and then having to pay replacements to cover the employees, I would have over an additional month and a half of labor costs to cover without the benefit of additional income. I would be closed within a year.

There needs to be some sort of balance here. It's already very difficult to operate a small business in NYC, and these changes are making it near impossible for us to survive. I am all for extending benefits to our employees, but you have to give a little if you are demanding so much of us. Maybe offering credits for city related costs, a slightly more lenient DOH scoring system? Subsidizing training for new employees- Maybe 40-80 hours worth? Something that is a little more fair.

Thank you for your time.

--

**Renato Poliafito**

**Founder**

BAKED

# Civic Ventures

1301 Second Avenue, Suite 2850, Seattle, WA 98101

---

## **Testimony Before the New York City Council Committee on Civil Service and Labor in favor of the Earned Safe, Sick and Personal Time Act, Proposed Int. No. 800-A**

**Submitted by Nick Hanauer,**

**Founder, Civic Ventures**

**May 24, 2019**

I appreciate the opportunity to provide feedback on this Act. My name is Nick Hanauer, and I am one of the most successful investors and business executives in Washington state. I have managed, founded, or financed 37 companies across a broad range of industries, creating an aggregate market value of tens of billions of dollars. I now devote the majority of my time to a broad portfolio of civic activities, and my team at Civic Ventures is a national leader on policy issues related to income inequality and the future of capitalism.

The issue of paid personal time is something I have been thinking about for a while now. I have a good understanding of how bosses and business leaders think, and I know why they don't give their employees personal time: because they don't legally have to. The U.S. is the only nation among the 21 richest countries that does not require employers to provide paid personal time. Instead, employers can force their employees to work day in and day out under threat of replacement if they dare to take time off. Our nation's policies have failed to protect workers from the extractive practices of their employers, and it is time that we take action to prevent this exploitation.

The Earned Safe, Sick and Personal Time Act is a solid step towards ensuring workers receive the benefits they deserve. It is unacceptable that more than half a million workers in New York City do not currently have any paid personal days. And it is even more unacceptable that the burden of non-stop work is largely borne by low-income workers, 60% of whom do not have any paid personal days. I personally believe that the United States should match the European Union standard of 20 paid personal days per year, but this law reestablishes the norm of paid personal time, providing a baseline on which we can build.

The passage of this Act will make New York City a leader in progressive labor laws, setting a new standard for the rest of the country to follow. But most importantly, it will make life better for workers in New York City whose employers have been allowed to have too much power over their lives.

As Seattle, New York, and dozens of cities and states around the United States have learned in the Fight for \$15, when more workers have more money, that's good for everyone. But those extra wages are meaningless if workers don't have the time to spend them. Imagine what half a million workers with ten days of paid personal time off, buying things that they otherwise wouldn't, will do for the city's economy. Their spending will create good-paying jobs in fields that can't be replaced by automation or outsourcing – and the workers in those jobs will also enjoy paid time off protections, thereby increasing the virtuous cycle of economic growth.

And, more importantly, the less tangible benefits: People will get to spend time with their children and families, and they'll have time for the important moments in their lives that don't have anything to do with work. They can participate in their communities and enjoy living in New York City in ways that they never could without paid personal time. All across the city, the quality of life will vastly improve.

Here's the bottom line: All working people deserve time off. In my business experience, my companies do better when my employees are happier and well-supported. I commend New York City's Office of the Mayor for their groundbreaking work on this Act.

Sincerely,

Nick Hanauer  
Founder, Civic Ventures

Say NO to Int 800A

Re: Say NO to Int 800A

Dear Hearings,

I constantly hear people talk about how important small business is to NYC. However, it seems that government is going out of its way to make it more difficult for small businesses like mine, Stinky Bklyn LLC, which is located in your district, to survive. I strive to create a good work environment for my employees and accommodate their requests for time off, and, of course, comply with the paid sick leave law. That's why I'm writing to ask that you OPPOSE Int 800A, which would mandate I provide an additional 2 weeks paid time off to my employees. This would pose incredible financial and administrative burdens on my business and only exacerbate the reduction of work hours and jobs for workers in NYC. Please DO NOT support Int 800A and instead support regulatory reforms that will help my business stay open and hopefully grow.

Sincerely,  
Michele Pravda  
[michelepravda@gmail.com](mailto:michelepravda@gmail.com)

SMITH ST  
BROOKLYN, NY 11231  
Constituent

Committee on Civil Service and Labor  
New York City Council  
250 Broadway - Committee Rm, 14th Fl.  
New York, New York 10007

*Via e-mail*

May 28, 2019

Re: Requiring city employers to provide earned safe, sick, and personal time to employees.

The Center for Law and Social Policy (CLASP) strongly supports the New York City Council's proposal to amend the city's Earned Sick and Safe Time Law to allow employees to receive up to eighty hours of personal time in a calendar year.

CLASP is a national organization that works to improve the lives of low-income people by developing and advocating for federal, state, and local policies that strengthen families and create pathways to education and work. We advocate for and conduct research and analysis on job quality policies, including paid sick days, paid family and medical leave, and fair scheduling. Further, we work with community and government partners to promote the effective implementation and enforcement of labor standards policies.

The proposed law recognizes that we all need time off from work for personal, medical, family, and civic purposes. This includes time to be with our family and loved ones. It may include time to vote, serve on a jury, or perform military service. It may relate to time needed to work a second or third job. We may need time to care for ourselves or others, including observing our religion, exercising, going to the doctor, or to grieve a loss. We may need time for joyful reasons, such as taking a vacation or pursuing a hobby, or reading a book. As students and/or parents, we may need time for classes, school events, and meetings with teachers. Some of us may need time to apply for essential benefits (SNAP, paid leave, Medicaid, healthcare), visit with a parole officer, or go to the DMV. Or perhaps we just need time to stay home and deal with a leak, call a plumber, or let in a contractor.

The proposed law further recognizes that workers, and particularly low-wage workers, struggle to take time off without suffering adverse consequences. While the law protects some absences, like jury duty,<sup>1</sup> and taking leave for a disability or serious medical condition,<sup>2</sup> many workers are not compensated for the time they take off.<sup>3</sup> People working in New York City benefit from numerous state and city laws, including the Earned Sick and Safe Time law, but still lack protections or the ability to afford to take time off for another needs.

Furthermore, access to time off is not equally available. Over 70 percent of private sector workers in the United States have access to some form of paid leave: paid holidays, paid sick leave, and paid vacations, but these benefits are largely distributed to higher-wage earners.<sup>4</sup> In the bottom decile of wage earners, roughly 4 in 10 workers have access to paid holidays and vacations, and only 3 in 10 have access to paid sick leave, compared to over 9 in 10 of the top 10 percent of wage earners who have paid holidays, sick leave, and vacations.<sup>5</sup> Full-time workers are also significantly more likely to have paid time off than part-time workers.

These disparities in access are likely to grow. Union workers, for example, are much more likely to have access to paid holidays, paid sick leave, and paid vacations, than nonunion workers.<sup>6</sup> But union membership continues to decline, even in New York.<sup>7</sup>

Not having time off has significant health, economic, and real-world consequences. Those without paid sick days are more likely to forgo or delay medical care, which has personal and public financial and health consequences.<sup>8</sup> During the 2009 H1N1 flu pandemic, people working while sick was the primary cause for an additional 1,500 deaths and 7 million cases of the flu. A lack of paid sick days is associated with lower use of critical preventive services, such as well-child visits and flu vaccinations. Working without a break can also lead to stress, burnout, exhaustion, and serious medical conditions. There is some anecdotal evidence that time off or working fewer hours may enhance productivity<sup>9</sup> and improve morale.<sup>10</sup>

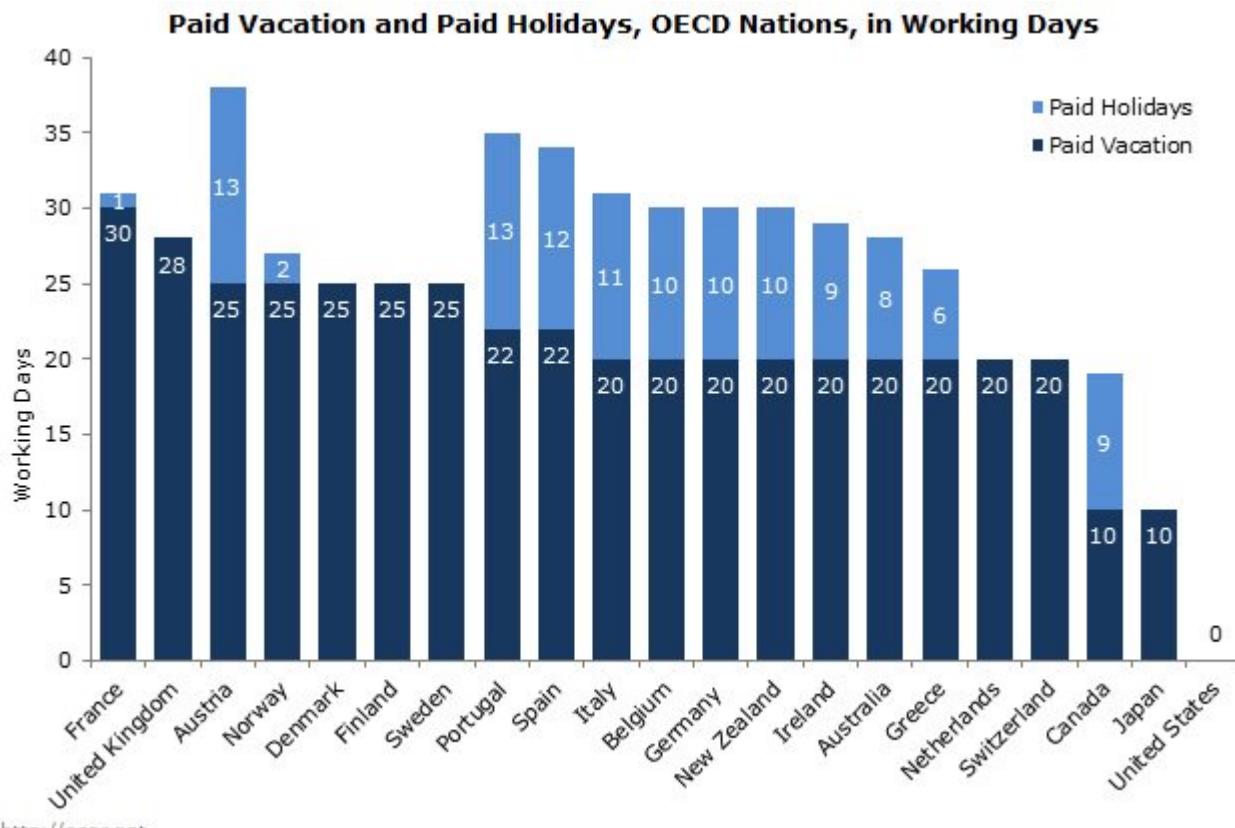
While New York City is one of an increasing number of jurisdictions with a paid sick days law,<sup>11</sup> some people, such as parents with young children, may still need to supplement those days off. In the first year of life of a baby's life alone, the American Academy of Pediatrics recommends eight visits to the pediatrician, just for well-child check-ups.<sup>12</sup> Infants and toddlers catch colds and other minor illnesses easily and often require additional doctors' visits and increased parental supervision at home as they recover. This bill could serve as an important resource for parents with toddlers and other young children that may need doctor's appointments, have childcare gaps, or want to engage with their children's development and school but not want to expend their sick time to meet with a teacher, childcare provider, or discuss behavior challenges.

The benefits of paid time off also extend beyond short and long-term health. Driving with an expired license, for example, can result in fines; unpaid traffic fines can result in suspended licenses, which can ultimately result in misdemeanor convictions. "If people stop driving when their licenses are suspended, they may no longer be able to reliably get to work, which means they risk losing their jobs and going deeper into debt."<sup>13</sup>

Having paid time off also allows low-wage workers to care for family members, address emergencies, and handle other unforeseen circumstances without the risk of losing their job. Among the many challenges of job loss for low-wage workers is the risk of losing benefits like SNAP. Currently, when SNAP recipients aged 18-49, without children or a documented disability, lose their job, they are at risk of losing their SNAP benefits for not complying with the rule that requires people to work a set number of hours per week to qualify for SNAP. Access for low-wage workers to up to 10 days of paid leave will decrease "churn" and allow people to receive the assistance they need and maintain economic stability.<sup>14</sup> Food is necessary to work,

live and thrive. Allowing people to have 10 days of paid leave will allow for food to remain on tables, without the risk of people cycling on and off of SNAP because of hours taken off due to unforeseen circumstances.

As with so many other critical labor standards, the United States is the only advanced economy that does not guarantee paid vacation or holidays.<sup>15</sup> Workers in Europe receive at least 20 paid vacation days a year, in addition to paid holidays. As illustrated in the following chart by the Center for Economic and Policy Research, people working in the U.S. are guaranteed zero paid vacation days or holidays.



Workers in the U.S. are working harder than ever, but not reaping the benefits. Worker productivity over the past four decades has been steadily increasing while hourly compensation has stagnated.<sup>16</sup> The Fair Labor Standards Act created a 40-hour workweek and required minimum hourly wages and overtime for working over 40 hours, but those minimum standards have not kept pace with inflation, increasing poverty.<sup>17</sup> There are many steps we need to take to improve job quality for workers earning low wages, including access to living wages, paid sick days, paid family and medical leave, and predictable schedules. But workers also sometimes just need a paid day off, without fear of losing critical pay or their job. They've earned it.

New York City's proposal requiring employers with at least 5 employees to provide at least 10 days of earned, paid time off each year would make New York one of the only jurisdictions in

the U.S. to provide workers this important benefit. CLASP urges the City Council to continue its leadership on providing critical labor standards protections, particularly for workers receiving low wages, and pass this proposed bill.

Sincerely,

**Tanya L. Goldman**

Senior Policy Analyst/Attorney, Job Quality

Phone: 202-906-8074

E-mail: [tgoldman@clasp.org](mailto:tgoldman@clasp.org)

<sup>1</sup> 28 U.S. Code § 1875

<sup>2</sup> See, e.g., Americans with Disabilities Act of 1990, 42 U.S.C. 12101 et seq., as amended by the ADA Amendments Act of 2008; Family and Medical Leave Act of 1993, 29 USC § 2601 et seq.

<sup>3</sup> U.S. Department of Labor Bureau of Labor Statistics Employee Benefits, Survey Table 32: Leave benefits: Access, private industry workers, March 2018,

<https://www.bls.gov/ncs/ebs/benefits/2018/ownership/private/table32a.htm>

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> U.S. Department of Labor Bureau of Labor Statistics, Economic News Release, “Union Members Summary,” Jan. 2019, <https://www.bls.gov/news.release/union2.nr0.htm>; U.S. Department of Labor Bureau of Labor Statistics, “Union Members in New York and New Jersey — 2018,” [https://www.bls.gov/regions/new-york-new-jersey/news-release/unionmembership\\_newyork\\_newjersey.htm](https://www.bls.gov/regions/new-york-new-jersey/news-release/unionmembership_newyork_newjersey.htm).

<sup>8</sup> Why Low-Wage Workers Need the Healthy Families Act, CLASP, 2019,

[https://www.clasp.org/sites/default/files/publications/2019/03/2019\\_why\\_low\\_wage\\_workers.pdf](https://www.clasp.org/sites/default/files/publications/2019/03/2019_why_low_wage_workers.pdf).

<sup>9</sup> Nicole Lyn Pesce, *This may be the secret to a longer life (and you’re not doing it enough)*, MarketWatch, Aug 28, 2018, <https://www.marketwatch.com/story/this-may-be-the-secret-to-a-longer-life-and-youre-not-doing-it-enough-2018-08-28>.

<sup>10</sup> Celina Ribeiro, *The Australian company that banned work on wednesdays*, BBC, April 2019, <http://www.bbc.com/capital/story/20190429-the-australian-company-that-banned-work-on-wednesdays>. An analysis of **workers in Sweden** found that those working a 6-hour day were more productive than those working an 8-hour day. Firms in **Australia** and New Zealand **experimented** with a four-day work week, where workers still got paid for five days. Unsurprisingly, staff reported “lower stress levels, higher levels of job satisfaction and an improved sense of work-life balance. The founder “wondered if having an extra day to manage their home life would make his staff more focused and productive in the office – and data and anecdotal evidence has proved his theory an unequivocal success.”

<sup>11</sup> See CLASP’s website [www.enforcingsickdays.org](http://www.enforcingsickdays.org).

<sup>12</sup> Rebecca Ullrich, Patricia Cole, Barbara Gebhard, and Stephanie Schmit, *Paid Leave: A Critical Support for Infants, Toddlers, and Families*, CLASP and Zero to Three, 2017, <https://www.clasp.org/publications/report/brief/paid-leave-critical-support-infants-toddlers-and-families>.

<sup>13</sup> Emily Yoffe, “Innocence Is Irrelevant,” The Atlantic, Sept. 2017,

<https://www.theatlantic.com/magazine/archive/2017/09/innocence-is-irrelevant/534171/>.

<sup>14</sup> Dottie Rosenbaum, *Lessons Churned: Measuring the Impact of Churn in Health and Human Services Programs on Participants and State and Local Agencies*, Center on Budget and Policy Priorities, 2015,

<https://www.cbpp.org/research/lessons-churned-measuring-the-impact-of-churn-in-health-and-human-services-programs-on?fa=view&id=5286>.

<sup>15</sup> Rebecca Ray, Milla Sanes, and John Schmitt, *No-Vacation Nation Revisited*, Center for Economic and Policy Research, 2013, <http://cepr.net/publications/reports/no-vacation-nation-2013>.

<sup>16</sup> Jay Shambaugh and Ryan Nunn, “Revitalizing Wage Growth: Policies to get American workers a raise,” Brookings, February 2018, <https://www.brookings.edu/multi-chapter-report/revitalizing-wage-growth-policies-to-get-american-workers-a-raise>.

<sup>17</sup> Ben Zipperer, *The erosion of the federal minimum wage has increased poverty, especially for black and Hispanic families*, Economic Policy Institute, 2018, <https://www.epi.org/publication/the-erosion-of-the-federal-minimum-wage-has-increased-poverty-especially-for-black-and-hispanic-families/>; Heidi Shierholz, *More than eight million workers will be left behind by the Trump overtime proposal*, Economic Policy Institute, 2019, <https://www.epi.org/publication/more-than-eight-million-workers-will-be-left-behind-by-the-trump-overtime-proposal-that-number-will-grow-to-11-5-million-in-the-first-10-years-of-implementation/>.



May 28, 2019

Hon. I. Daneek Miller  
Chair, NYC Council Committee on Civil Service and Labor  
250 Broadway, Suite 1810  
New York, NY 10007

**Re: Int 0800-2018**

Dear Councilmember Miller and Members of the Committee on Civil Service and Labor,

We write to you on behalf of small business owners in opposition to Int 0800-2018, *A Local Law to amend the administrative code of the city of New York, in relation to requiring city employers to provide earned safe, sick, and personal time to employees.* This proposal, if passed, will require an additional two weeks of paid vacation or personal time off on top of the already mandated five days given to all employees for paid sick time.

Franchisees and independent small business owners carry all the responsibilities associated with opening and running a brick-and-mortar restaurant, including incurring the debt, adhering to the growing multitude of government regulations imposed upon them, and trying to build businesses and create jobs. This proposed paid time off mandate will substantially add to the cumulative cost pressures that New York City restaurants continue to face. Restaurants cannot absorb all of these costs without experiencing negative impacts. If this legislation passes as written, there will be no notification requirements for employees to take time off. With that in mind, employers would then be forced to pay fines for replacing employees who take time off without sufficient notice due to the current Fair Workweek laws. Though well-intentioned, the unintended consequences of this legislation could be far reaching.

Further, this piece of legislation presents significant operational challenges to business practices. For example, as it is currently written, this bill requires three years of record keeping which is an added administrative burden. These extra financial and administrative burdens will result in small businesses having to sacrifice productivity and possibly sales and added job opportunities.

It is not uncommon for franchisees and small business owners to voluntarily offer some form of paid leave to their employees in an effort to retain quality talent, even beyond what is legally mandated. This legislation will put those businesses at an unfair disadvantage, as their current policies or plans may not align with this proposed legislation.





For all of the above stated reasons, we urge you to reject this legislation. Thank you for your consideration.

Sincerely,

**Rod Valencia**  
NY Dunkin' Franchisee  
[rodv@legacyqsr.com](mailto:rodv@legacyqsr.com)  
718.594.6300

**Peter Green**  
Regional Vice President, New York  
Dunkin' Brands  
781.223.3551



# 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: 5/28/19

(PLEASE PRINT)

Name: Rosa Riveras

Address: 665 Westchester Ave

I represent: 32BJ

Address: 25 W 18 St

# 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: 5/28/19

(PLEASE PRINT)

Name: Violetta Leiseca

Address: 665 Westchester Ave

I represent: 32BJ

Address: 25 W 18 St

# 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: JUNIYA MONTMERY

Address: 43 JEFFERSON AVE NY 11580

I represent: 32BJ

Address: 25 W 18<sup>th</sup> ST NY

# 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: 05-28-19

(PLEASE PRINT)

Name: Whitney Moore

Address: 854 East 55<sup>th</sup> Street Brooklyn NY 11212

I represent: 32bj

Address:

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800-A Res. No. \_\_\_\_\_

in favor     in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: NELSON EUSBIO

Address: 30-50 WHITESTONE EXPY, QUEENS NY 11385

I represent: NATIONAL SUPERMARKET ASSOC.

Address:

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800-A Res. No. \_\_\_\_\_

in favor     in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Paul Sonn

Address: 90 BROAD ST, SEC 1100, NY, NY 10004

I represent: NATIONAL EMPLOYMENT LAW PROJECT

Address: SAME

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: 5/28/19

(PLEASE PRINT)

Name: Joshua Stanton

Address: \_\_\_\_\_

I represent: East End Temple

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: Vladimir Cisneros

Address: 196-15 Hillside Ave Hollis NY 11423

I represent: 32bj

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

*Appearance Card*

I intend to appear and speak on Int. No. 800A Res. No. \_\_\_\_\_

in favor     in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: Mary Ann Giannone

Address: 46 Elm Avenue

I represent: Pauline Geels

Address: 60 Greenpoint Avenue  
Bklyn NY

**THE COUNCIL  
THE CITY OF NEW YORK**

*Appearance Card*

I intend to appear and speak on Int. No. P.T.O. Res. No. \_\_\_\_\_  
 in favor     in opposition

*Date:* \_\_\_\_\_

**(PLEASE PRINT)**

Name: SALCEDO BACCHIUS

Address: 108-36-88 AVENUE 6B JAMAICA, NY 11432

I represent: 32 BJS

Address: 25 18 WEST 57TH MANHATTAN

**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: Pedro GAMBOA

Address: 442 KINGSBOROUGH APT 6E BROOKLYN NY 11233

I represent: 3263

Address: 25 W 18

**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:* 05/28/19

**(PLEASE PRINT)**

Name: Jordany Bueno

Address: 574 West 178ST

I represent: 32BJ

Address: 25 W 18

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800 Res. No. \_\_\_\_\_

in favor     in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: Casey Adams, Director of City

Address: Legislative Affairs

I represent: DCWP

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800 Res. No. \_\_\_\_\_

in favor     in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: Sam Krinsky, Research Director

Address: \_\_\_\_\_

I represent: DCWP

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800 Res. No. \_\_\_\_\_

in favor     in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: Commissioner Lorelai Salas

Address: \_\_\_\_\_

I represent: Dept. of Consumer and Worker

Address: \_\_\_\_\_

Protection  
(DCWP)

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: Tomas Shaende

Address: \_\_\_\_\_  
I represent: Fiscal Policy Institute  
Address: 11 Park Place NY 10046

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. SW Res. No. \_\_\_\_\_  
 in favor     in opposition

Date: 3/28/19

(PLEASE PRINT)

Name: Jill Maxwell, Legal + Policy Director

Address: Department of Consumer + Worker Protection

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800A Res. No. 5007  
 in favor     in opposition

Date: 3/28/19

(PLEASE PRINT)

Name: Kathleen Reilly

Address: \_\_\_\_\_

I represent: New York State Restaurant Assn

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800-A Res. No. \_\_\_\_\_  
 in favor     in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: Jay Peltz

Address: 1385 Rockaway Post NJ

I represent: Food Industry Alliance of NY

Address: Same

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800-A Res. No. \_\_\_\_\_  
 in favor     in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: JESSICA WALKER President

Address: 220 5th Ave

I represent: Manhattan Chamber of Commerce

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: ROSA SQUILLACOTE

Address: 45 BROADWAY

I represent: HAND IN HAND ORGANIZATION

Address: 45 BROADWAY

→ 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: Blair Papagni

Address: 28 Richardson St.

I represent: BABAR

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. POVA Res. No. \_\_\_\_\_

in favor  in opposition

Date: 5/28

(PLEASE PRINT)

Name: Irene Lew

Address: \_\_\_\_\_

I represent: Community Service Society of NY

Address: 633 Third Ave 16th floor NY NY

# 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: MAURINA JAMES

Address: 45 Broadway

I represent: NDWA NATIONAL DOMESTIC WORKERS

Address: 45 BROADWAY ALLIANCE

# 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: JACQUI ORIE

Address: 45 BROADWAY

I represent: NATIONAL DOMESTIC WORKERS ALLIANCE

Address: 45 BROADWAY

# 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: TATIANA BEHAR

Address: 45 BROADWAY

I represent: HAND IN HAND ORGANIZATION

Address: 45 BROADWAY

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800A Res. No. \_\_\_\_\_  
 in favor     in opposition

Date: 5/28/11

(PLEASE PRINT)

Name: ROBERT BOOKMAN

Address: \_\_\_\_\_

I represent: NEW YORK CITY HOSPITALITY ALLIANCE

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800-A Res. No. \_\_\_\_\_

in favor     in opposition

Date: 5-28-19

(PLEASE PRINT)

Name: Marcella Kocolatos

Address: 61-17 68th Ave, #2L, Ridgewood, NY 11385

I represent: A Better Balance

Address: 40 Worth St., 10th Fl., NY, NY 10013

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800A Res. No. \_\_\_\_\_

in favor     in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: ANDREW RIGIE

Address: 65 & 55 ST

I represent: NEW YORK CITY HOSPITALITY ALLIANCE

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

*Appearance Card*

I intend to appear and speak on Int. No. 800A Res. No. \_\_\_\_\_

in favor     in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Samantha Kerasyk

Address: \_\_\_\_\_

I represent: Brooklyn Chamber of Commerce

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

**Appearance Card**

I intend to appear and speak on Int. No. 800 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 5/28/19

**(PLEASE PRINT)**

Name: MATT GRELLER

Address: \_\_\_\_\_

I represent: NATO Theatre Owners of NYS, Inc.

Address: 311 W 43<sup>rd</sup> ST NY NY 10036

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

**THE COUNCIL  
THE CITY OF NEW YORK**

**Appearance Card**

I intend to appear and speak on Int. No. 800 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 5/28/19

**(PLEASE PRINT)**

Name: Jessica Walker

Address: 3075 Fifth Ave

I represent: Manhattan Chamber of Commerce

Address: (same)

**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. 800 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: ADIRA SIMAN

Address: \_\_\_\_\_

I represent: PARTNERSHIP FOR NEW YORK CITY

Address: 1 BATTERY PARK PLAZA NY, NY 10004

► 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. 800 A Res. No. \_\_\_\_\_

in favor  in opposition

Date: 5/28/19

(PLEASE PRINT)

Name: Maria Diaz

Address: \_\_\_\_\_

I represent: Greenwich Village Chelsea Chamber of Commerce

Address: 125 Varick St.

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