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## THE COUNCIL

# **COMMITTEE REPORT OF THE GOVERNMENTAL AFFAIRS Division**

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**COMMITTEE ON GOVERNMENTAL OPERATIONS**

*Hon. Fernando Cabrera, Chair*

#### October 19, 2021

**Int. 34:** By Council Member Louis

**Title:** A Local Law to amend the New York city charter, in relation to the use of government resources during an election campaign

**Charter:** Amends section 1136.1(2)(b)

**Int. 66:** ByCouncil Members Cumbo, the Public Advocate (Mr. Williams), Gibson, Cabrera, Brannan, Powers, Levine, Lander, Dinowitz, Brooks-Powers, Adams and Riley

**Title:** A Local Law to amend the New York city charter, in relation to establishing an office to prevent gun violence

**Charter**: Adds a new section 13-e

**Proposed Int. 167-A:** By Council Members Maisel, Yeger, Holden, Vallone, Gibson, Levin, D. Diaz and Ulrich

**Title:** A Local Law to amend the New York city charter, in relation to requiring certain agencies to be capable of issuing warnings

**Charter:** Amends sections 556(a)(1), 643, 753, 1403, and 2203(e)

**Preconsidered Int. 2433:** By Council Member Cabrera

**Title:** A local law to amend the administrative code of the city of New York, in relation to electronic issuance of notices of violation returnable to the environmental control board or a tribunal of the office of administrative trials and hearings

**Administrative Code:** Adds new title 34

# **Introduction**

On October 19, 2021, the Committee on Governmental Operations, chaired by Council Member Cabrera, will hold a hearing on the following pieces of legislation: Int. 34, sponsored by Council Member Louis, in relation to the use of government resources during an election campaign; Int. 66, sponsored by Council Member Cumbo, in relation to establishing an office to prevent gun violence; Proposed Int. 167-A, sponsored by Council Member Maisel, in relation to requiring certain agencies to be capable of issuing warnings; and Preconsidered Int., sponsored by Council Member Cabrera, in relation to electronic issuance of notices of violation returnable to the Environmental Control Board or a tribunal of the Office of Administrative Trials and Hearings. Those invited to testify include the Campaign Finance Board, representatives from the Administration, and members of the public.

# **Background**

# **Blackout Periods under State and Local Law**

A “blackout period” is the colloquial name for a statutory period of time during which a government official is prohibited from sending official mass-mailings prior to an election in which that official is running as a candidate. The purpose of a blackout period is to prohibit certain uses of government funds and resources by government officers for political purposes.[[1]](#footnote-1) Specifically, blackout periods prevent incumbents running for reelection from using their government office to raise their profile in the community immediately prior to that election, a practice that would give the incumbent an advantage over opponents who do not have access to the same public resources. In 2004, the Council enacted a local law extending the blackout period that applies to local officials from 30 days to 90 days.[[2]](#footnote-2)

In light of differences between state rules and local law, state and local officials running in the same local election are not necessarily subject to the same blackout period. For instance, under the rules of the State Assembly, Assembly Members are only prohibited from sending mass mailings for 30 days before a local election in which they are running.[[3]](#footnote-3) Local officials, meanwhile, are generally prohibited from sending mass mailings for 90 days, as noted above.[[4]](#footnote-4) This discrepancy has led some to conclude that sitting Assembly Members have an advantage over sitting local officials when running for local office.[[5]](#footnote-5) As explained in greater detail below, Int. 34, sponsored by Council Member Louis, seeks to address this issue by reducing the blackout period for local officials to 30 days.

# **The Mayor’s Office to Prevent Gun Violence**

# In February of 2017, Mayor de Blasio announced the creation of a new Office to Prevent Gun Violence (OPGV).[[6]](#footnote-6) The Office was established to oversee and expand upon the City’s existing anti-gun violence initiatives.[[7]](#footnote-7) Today, the core component of OPGV’s work is the Crisis Management System (CMS).[[8]](#footnote-8) Arising out of a recommendation from the City Council’s Task Force to Combat Gun Violence,[[9]](#footnote-9) CMS utilizes a “cure violence” approach.[[10]](#footnote-10) It deploys teams of “credible messengers”—members of the community whose backgrounds provide them with credibility among at-risk individuals—to identify and mediate potentially-violent conflicts and connect high-risk individuals with services. By connecting these individuals with services such as employment programs, mental health services, and trauma counseling, this approach is intended to reduce the risk of violence in the long term.[[11]](#footnote-11) CMS operates in 22 communities across the City and incorporates the work of over 50 community-based organizations that provide services to high-risk individuals.[[12]](#footnote-12)

In 2020, Mayor de Blasio placed OPGV under the Mayor’s Office of Neighborhood Safety (ONS).[[13]](#footnote-13) Today, ONS consists of three interdependent programs: OPGV, the Mayor’s Action Plan for Neighborhood Safety (MAP), and Atlas.[[14]](#footnote-14) MAP is a community-based program that aims to reduce violent crime in 15 NYCHA developments across the City. Through its NeighborhoodStat initiative, MAP brings together residents, community stakeholders, and representatives from city agencies to identify and address the underlying drivers of crime in communities.[[15]](#footnote-15)

The Atlas program works directly with individuals facing criminal charges who are on pretrial release and are at heightened risk of future victimization or justice-system involvement.[[16]](#footnote-16) To promote well-being and overall safety, Atlas connects these individuals with therapeutic services, mentorship, education and employment opportunities, and other resources.[[17]](#footnote-17)

As explained in greater detail below, Int. 66, sponsored by Council Member Cumbo, would make OPGV a charter-mandated office.

# **Issuance of ECB Summonses**

The Environment Control Board (ECB) is an administrative tribunal that was created in 1971 to enforce violations of air and noise pollution regulations in New York City.[[18]](#footnote-18) Over time, ECB’s jurisdiction has expanded to include adjudication of citations issued for violations of the fire, building, and sanitation codes, among others. In 2008, the Council enacted a local law consolidating ECB into the Office of Administrative Trials and Hearings (OATH).[[19]](#footnote-19) Today, at least thirteen enforcement agencies issue notices of violations (NOVs) that are adjudicated by ECB,[[20]](#footnote-20) including the Department of Buildings, the Department of Sanitation, the Fire Department, the Department of Transportation, the Department of Environmental Protection, the New York City Police Department, the Department of Health and Mental Hygiene, the Department of Parks and Recreation, and others.[[21]](#footnote-21)

When an agency issues an NOV returnable to ECB, the respondent can either pay the fine prescribed or request a hearing. All such hearings are adjudicated by hearing officers at OATH. If a hearing officer rules against the respondent at an ECB hearing, the respondent will generally have to pay a fine. ECB fines that remain unpaid for 90 days result in a judgment. Any such judgments for amounts less than $25,000 are docketed in Civil Court and referred to the Department of Finance (DOF) for collection.[[22]](#footnote-22)

DOF reports annually on the ECB judgments that have been referred to the Department for collection. According to the most recent such report, as of November 2020, DOF was responsible for over $1.32 billion of ECB judgments, nearly a quarter of which (over $305 million) had been written off as “bad debt” for accounting purposes because of collections issues.[[23]](#footnote-23)

On October 1, 2020, the Department of Investigation (DOI) released a report identifying barriers to the enforcement and collection of ECB debt.[[24]](#footnote-24) According to the report, the practice of writing certain NOVs by hand may lead to various issues that prevent such NOVs from being enforced.[[25]](#footnote-25) For instance, illegible handwriting may cause OATH to dismiss an NOV at a hearing or, alternatively, enter a judgment that contains an inaccuracy such that the debt is ultimately uncollectable.[[26]](#footnote-26) To address this issue, the DOI report recommends that all issuing agencies use portable electronic devices to issue NOVs.[[27]](#footnote-27)

As explained in greater detail below, Preconsidered Int., sponsored by Council Member Cabrera, seeks to implement this recommendation by requiring agencies to equip enforcement officers with portable devices capable of issuing NOVs electronically, and requiring enforcement officers to use such devices whenever possible. Proposed Int. 167-A, sponsored by Council Member Maisel, seeks to ensure that enforcement officers who issue NOVs have devices capable of issuing warnings for certain first-time violations.

# **Legislative Analysis**

**Int. 34**

Section 1136.1(2)(b) of the Charter generally prohibits any local public servant who is a candidate for elective office (or who is the spouse of such a public servant) from using government resources for mass mailings within 90 days of any local election in which such public servant is a candidate. Int. 34 (Louis) would reduce this 90 day “blackout period” to 30 days. This bill would take effect immediately.

**Int. 66**

Int. 66 (Cumbo) would make OPGV a charter-mandated office. Specifically, it would require the Mayor to establish an Office to Prevent Gun Violence, and would allow the Mayor to house such office in the executive office of the Mayor, within any existing mayoral office, or within any department the head of which is appointed by the Mayor. The Office would be headed by a director, who would be appointed by the Mayor or, if the Office is established within a department, the head of such department.

The bill would give the Director of OPGV the following powers and duties: (i) advising and assisting the Mayor in planning, developing and coordinating efforts to reduce gun violence; (ii) engaging with members of the public to develop further strategies for reducing gun violence; (iii) reviewing the budget requests of all agencies for programs related to gun violence, recommending budget priorities among such programs, and assisting the Mayor in prioritizing such requests; and (iv) performing such other duties as the Mayor may assign.

This bill would take effect 30 days after becoming law.

**Proposed Int. 167-A**

Proposed Int. 167-A (Maisel), would require the Department of Health and Mental Hygiene, the Department of Buildings, the Department of Sanitation, the Department of Environmental Protection, and the Department of Consumer and Worker Protection to equip their inspectors with devices capable of (i) determining whether an observed infraction would be a first-time violation; (ii) issuing a warning for first-time violations, if permitted by law; and (iii) after a warning has been issued, recording that fact so that any subsequent violation by the same person or entity would not incorrectly appear to be a first-time violation. This bill would take effect six months after becoming law.

**Preconsidered Int.**

Preconsidered Int. (Cabrera), would require each agency that issues NOVs returnable to ECB or any other administrative tribunal of OATH to equip each of its enforcement officers with an electronic device that enables the officer to: (i) fill out NOVs electronically; (i) print electronically-completed NOVs so they may be served upon the respondent; (iii) electronically transmit NOVs to OATH; (iv) indicate on an NOV the section of law or rule alleged to have been violated by selecting such section from a list; and (v) to the extent practicable, access relevant city databases to validate respondent information.

The bill would also require enforcement officers to use such electronic devices whenever issuing NOVs, unless the relevant officer’s device is temporarily broken or would not otherwise be capable of issuing a valid or accurate NOV under the circumstances. Notwithstanding the general requirement to issue NOVs electronically, the bill would not render handwritten NOVs invalid or otherwise unenforceable.

In addition, the bill would require each agency that issues NOVs to submit to the Mayor’s Office of Operations, on an annual basis, data regarding the total number of NOVs issued in the past year and the number of such NOVs that were issued using an electronic device. The Mayor’s Office of Operations would be required to compile this data into a report, which would be due to the Speaker by September 1 of each year.

This bill would take effect 365 days after becoming law.

Int. No. 34

By Council Member Louis

A Local Law to amend the New York city charter, in relation to the use of government resources during an election campaign

Be it enacted by the Council as follows:

Section 1. Paragraph (b) of subdivision 2 of section 1136.1 of the New York city charter is amended to read as follows:

(b) No public servant who is a candidate for nomination or election to any elective office or the spouse of such public servant shall use, cause another person to use, or participate in the use of governmental funds or resources for a mass mailing that is postmarked, if mailed, or delivered, if by other means, less than thirty [ninety] days prior to any primary or general election for any elective office for which office such person is a candidate for nomination or election; provided, however, that a candidate may send one mass mailing, which shall be postmarked, if mailed, or delivered, if by other means, no later than twenty-one days after the adoption of the executive budget pursuant to section two hundred fifty-four. No such mass mailing shall be intentionally sent to individuals outside the particular council district, borough, or other geographic area represented by such candidate.

§ 2. This local law takes effect immediately.

RP/BJR

LS 621

Int. 1795-2017

1/2/18 6:45PM

Int. No. 66

By Council Members Cumbo, the Public Advocate (Mr. Williams), Gibson, Cabrera, Brannan, Powers, Levine, Lander, Dinowitz, Brooks-Powers, Adams and Riley

A Local Law to amend the New York city charter, in relation to establishing an office to prevent gun violence

Be it enacted by the Council as follows:

Section 1. The New York city charter is amended by adding a new section 13-e to read as follows:

§ 13-e. Office to prevent gun violence. a. The mayor shall establish an office to prevent gun violence. Such office may, but need not, be established in the executive office of the mayor and may be established as a separate office, within any other office of the mayor or within any department, the head of which is appointed by the mayor. Such office shall be headed by a director who shall be appointed by the mayor or the head of such department. For the purposes of this section, the term "director" means the director of the office to prevent gun violence.

b. The director shall have the power and the duty to:

1. Advise and assist the mayor in planning, developing and coordinating efforts to reduce gun violence;

2. Engage with members of the community, elected officials, and other interested groups and individuals to develop further strategies to reduce gun violence;

3. Review the budget requests of all agencies for programs related to gun violence, recommend budget priorities among such programs, and assist the mayor in prioritizing such requests; and

4. Perform other duties as the mayor may assign.

§ 2. This local law takes effect 30 days after it becomes law.

DA (2017)/MMB (2018)

LS # 6781/Int. 1470-2017

NEW LS # 1011

1/23/18; 4:13 p.m.

Proposed Int. No. 167-A

By Council Members Maisel, Yeger, Holden, Vallone, Gibson, Levin, D. Diaz and Ulrich

A Local Law to amend the New York city charter, in relation to requiring certain agencies to be capable of issuing warnings

Be it enacted by the Council as follows:

Section 1. Paragraph (1) of subdivision a of section 556 of the New York city charter is amended to read as follows:

(1) Enforce all provisions of law applicable in the area under the jurisdiction of the department for the preservation of human life, for the care, promotion and protection of health and relative to the necessary health supervision of the purity and wholesomeness of the water supply and the sources thereof. Each inspector or other employee of the department who issues notices of violation shall have access at the time that a violation is issued to equipment allowing such person: (a) to determine if such violation is a first-time violation of the applicable provision of law, and (b) if permitted by law, to issue a warning for such violation for which no appearance before the department’s tribunal is required and to record that such a warning has been issued;

§ 2. The text in section 643 of the New York city charter prior to subdivision (1) is amended to read as follows:

The department shall enforce, with respect to buildings and structures, such provisions of the building code, zoning resolution, multiple dwelling law, labor law and other laws, rules and regulations as may govern the construction, alteration, maintenance, use, occupancy, safety, sanitary conditions, mechanical equipment and inspection of buildings or structures in the city[,]. Each inspector or other employee of the department who issues notices of violation shall have access at the time that a violation is issued to equipment allowing such person: (i) to determine if such violation is a first-time violation of the applicable provisions of law, and (ii) if permitted by law, to issue a warning for such violation for which no appearance before a tribunal is required and to record that such a warning has been issued. The department [and] shall perform the functions of the city of New York relating to:

§ 3. Section 753 of the New York city charter is amended by adding a new subdivision e to read as follows:

e. Each inspector or other employee of the department who issues notices of violation shall have access at the time that a violation is issued to equipment allowing such person: (1) to determine if such violation is a first-time violation of the applicable provision of law, and (2) if permitted by law, to issue a warning for such violation for which no appearance before a tribunal is required and to record that such a warning has been issued.

§ 4. The text in section 1403 of the New York city charter prior to subdivision a is amended to read as follows:

Except as otherwise provided by law, the commissioner shall have charge and control of and be responsible for all those functions and operations of the city relating to the provision of a pure, wholesome and adequate supply of water, the disposal of sewage and the prevention of air, water and noise pollution, and shall be authorized to respond to emergencies caused by releases or threatened releases of hazardous substances and to collect and manage information concerning the amount, location and nature of hazardous substances. Each inspector or other employee of the department who issues notices of violation shall have access at the time that a violation is issued to equipment allowing such person: (1) to determine if such violation is a first-time violation of the applicable provision of law, and (2) if permitted by law, to issue a warning for such violation for which no appearance before a tribunal is required and to record that such a warning has been issued. The powers and duties of the commissioner shall include, without limitation, the following:

§ 5. Subdivision (e) of section 2203 of the New York city charter is amended to read as follows:

(e) The commissioner, in the performance of said functions, shall be authorized to hold public and private hearings, administer oaths, take testimony, serve subpoenas, receive evidence, and to receive, administer, pay over and distribute monies collected in and as a result of actions brought for violations of laws relating to deceptive or unconscionable trade practices, or of related laws, and to promulgate, amend and modify rules and regulations necessary to carry out the powers and duties of the department. Each inspector or other employee of the department who issues notices of violation shall have access at the time that a violation is issued to equipment allowing such person: (1) to determine if such violation is a first-time violation of the applicable provision of law, and (2) if permitted by law, to issue a warning for such violation for which no appearance before the department’s tribunal is required and to record that such a warning has been issued.

§ 6. This local law takes effect 6 months after it becomes law.

DSS/cjm

LS 172/2014/Int 90

LS 443/2018

09/07/2021

Preconsidered Int. No.

By Council Member Cabrera

A Local Law to amend the administrative code of the city of New York, in relation to electronic issuance of notices of violation returnable to the environmental control board or a tribunal of the office of administrative trials and hearings

Be it enacted by the Council as follows:

Section 1. The administrative code of the city of New York is amended by adding a new title 34 to read as follows:

Title 34: Administrative Trials and Hearings

Chapter 1: General Provisions

§ 34-101 Electronic issuance of notices of violation returnable to the environmental control board or a tribunal of the office of administrative trials and hearings. a. Definitions. For the purpose of this section, the following terms have the following meanings:

Electronic device. The term “electronic device” means one or more pieces of electronic equipment capable of being carried by an enforcement officer on such officer’s person in the course of such officer’s duties.

Enforcement officer. The term “enforcement officer” means any officer or employee of an agency who is authorized to issue notices of violation.

Notice of violation. The term “notice of violation” means any notice of violation returnable to the environmental control board or a tribunal of the office of administrative trials and hearings.

b. Each agency that issues notices of violation shall equip each of its enforcement officers with an electronic device while such officer is engaged in enforcement activities that enables such officer to:

1. Fill out notices of violation electronically;

2. Print notices of violation once completed so that they may be served upon respondents in accordance with applicable law;

3. Electronically transmit notices of violation once completed to the to the office of administrative trials and hearings;

4. Indicate on a notice of violation the section of law or rule alleged to have been violated by selecting such section from a list; and

5. To the extent practicable, access relevant city databases such as the buildings information system and the automated city register information system to validate respondent information.

c. Except as provided in subdivision d of this section, enforcement officers shall issue all notices of violation using an electronic device meeting the requirements of subdivision b of this section.

d. An enforcement officer may issue a notice of violation by means other than using an electronic device meeting the requirements of subdivision b of this section if the electronic device provided to such officer pursuant to subdivision b of this section would not be capable of issuing a valid or accurate notice of violation under the circumstances.

e. Nothing in this section shall be construed so as to render a notice of violation invalid, defective or otherwise unenforceable solely because it was not issued in accordance with the requirements of this section.

f. 1. No later than August 1, 2022, and each August 1 thereafter, each agency that issues notices of violation shall submit to the mayor’s office of operations the following data:

(a) The total number of notices of violation issued by such agency in the preceding fiscal year; and

(b) The total number of notices of violation issued by such agency in the preceding fiscal year using an electronic device meeting the requirements of subdivision b of this section.

2. No later than September 1, 2022, and each September 1 thereafter, the mayor's office of operations shall:

(a) compile the data submitted pursuant to paragraph 1 of this subdivision into a single report that disaggregates such data by agency;

(b) deliver such compiled report to the speaker of the council; and

(c) post such compiled report on the single web portal described in section 23-502 of this code.

§ 2. This local law takes effect 365 days after becoming law.

CJM

LS #16897

10/14/2021

1. *See* N.Y. City Council, Committee on Governmental Operations, Report on Int. No. 124-A (Dec. 15, 2004) *available at* <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=441284&GUID=7FB83B54-ED94-4165-96AD-924627AFA2DA&Options=Advanced&Search>. [↑](#footnote-ref-1)
2. *See* N.Y.C. Loc. Law 58 of 2004. [↑](#footnote-ref-2)
3. Rules of the Assembly of the State of New York, 2017-2018, R.5 § 10 (a). [↑](#footnote-ref-3)
4. *See* Charter § 1136.1(2)(b). [↑](#footnote-ref-4)
5. *See* Samar Khurshid, *Mass Mailer Loophole Gives State Legislators Advantage in City Council Races*, Gotham Gazette (Aug. 30, 2017), <http://www.gothamgazette.com/city/7163-mass-mailer-loophole-gives-state-legislators-advantage-in-city-council-races> . [↑](#footnote-ref-5)
6. *See* Press Release, Mayor de Blasio, City Council Launch Mayor's Office to Prevent Gun Violence (February 2017), <https://www1.nyc.gov/office-of-the-mayor/news/064-17/mayor-de-blasio-city-council-launch-mayor-s-office-prevent-gun-violence#/0>. [↑](#footnote-ref-6)
7. *See* J. Brian Charles, *A Plan to Combat Gun Violence That Doesn't Focus on Guns*, Governing (August 24, 2017), <https://www.governing.com/archive/gov-new-york-cure-violence-gun.html>. [↑](#footnote-ref-7)
8. New York City Mayor’s Office of Criminal Justice, The Office of Neighborhood Safety, <https://criminaljustice.cityofnewyork.us/programs/ons/> (last accessed October 12, 2021). [↑](#footnote-ref-8)
9. *See* New York City Council Task Force to Combat Gun Violence, Report to City Council Speaker Christine C. Quinn (2012), <http://council.nyc.gov/press/wp-content/uploads/sites/56/2016/12/gvtfreport.pdf>. [↑](#footnote-ref-9)
10. *See* NYC Mayor’s Office to Prevent Gun Violence, Crisis Management, <https://www1.nyc.gov/site/peacenyc/interventions/crisis-management.page> (last accessed October 12, 2021). [↑](#footnote-ref-10)
11. *See id.*; NYC Mayor’s Office of Criminal Justice, The Office of Neighborhood Safety, <https://criminaljustice.cityofnewyork.us/programs/ons/> (last accessed October 12, 2021). [↑](#footnote-ref-11)
12. NYC Mayor’s Office of Criminal Justice, Mayor’s Office to Prevent Gun Violence, <https://criminaljustice.cityofnewyork.us/programs/office-to-prevent-gun-violence/> (last accessed October 12, 2021). [↑](#footnote-ref-12)
13. *See* NYC Mayor’s Office of Criminal Justice, The Office of Neighborhood Safety, <https://criminaljustice.cityofnewyork.us/programs/ons/> (last accessed October 12, 2021). [↑](#footnote-ref-13)
14. *Id.* [↑](#footnote-ref-14)
15. *See id.*; Mayor’s Action Plan for Neighborhood Safety, Learn About Map, <https://map.cityofnewyork.us/learn-about-map/> (last accessed October 13, 2021). [↑](#footnote-ref-15)
16. NYC Mayor’s Office of Criminal Justice, The Office of Neighborhood Safety, <https://criminaljustice.cityofnewyork.us/programs/ons/> (last accessed October 12, 2021). [↑](#footnote-ref-16)
17. *Id.* [↑](#footnote-ref-17)
18. *See* N.Y.C. Loc. Law 49 of 1971, § 4. [↑](#footnote-ref-18)
19. N.Y.C. Loc. Law 35 of 2008. [↑](#footnote-ref-19)
20. *See* Office of Administrative Trials and Hearings, About ECB, <https://www1.nyc.gov/site/oath/hearings/about-ecb.page> (last accessed October 14, 2021). [↑](#footnote-ref-20)
21. *See* NYC Department of Finance, Annual Report on Environmental Control Board (ECB) - Adjudicated Judgments (2019), <https://www1.nyc.gov/assets/finance/downloads/pdf/19pdf/ecb-annual-report-2019.pdf>. [↑](#footnote-ref-21)
22. Judgments over $25,000 cannot be docketed in Civil Court. Accordingly, those judgments are referred to the Law Department for docketing in Supreme Court. The Law Department also handles collection efforts for such judgments. *See* NYC Department of Investigation, Environmental Control Board Summons Enforcement & Collection: DOI Investigation Identifies Serious Gaps and Issues Recommendations for Reform (2020), at 5, <https://www1.nyc.gov/assets/doi/reports/pdf/2020/12ECB_Release_Report100120.pdf>. [↑](#footnote-ref-22)
23. *See* NYC Department of Finance, Annual Report on Environmental Control Board (ECB) - Adjudicated Judgments (2020), <https://www1.nyc.gov/assets/finance/downloads/pdf/20pdf/fy20-21-ecb-annual-report.pdf> [↑](#footnote-ref-23)
24. NYC Department of Investigation, Environmental Control Board Summons Enforcement & Collection: DOI Investigation Identifies Serious Gaps and Issues Recommendations for Reform (2020), <https://www1.nyc.gov/assets/doi/reports/pdf/2020/12ECB_Release_Report100120.pdf>. [↑](#footnote-ref-24)
25. *Id.* at 13. [↑](#footnote-ref-25)
26. *Id.* [↑](#footnote-ref-26)
27. *Id.* [↑](#footnote-ref-27)