

**Testimony of Casey Adams  
New York City Department of Consumer Affairs**

**Before the  
New York City Council Committee on Consumer Affairs and Business Licensing**

**Hearing on  
Introductions 1023-2018 & 1281-2018**

**February 14, 2019**

Good morning Chairman Espinal and members of the committee. My name is Casey Adams and I am the Director of City Legislative Affairs for the New York City Department of Consumer Affairs (DCA). I would like to thank the committee for the opportunity to testify today on behalf of DCA Commissioner Lorelei Salas regarding Introductions 1023-2018 (Intro. 1023) and 1281-2018 (Intro. 1281), related to cashless payment policies at retail and food service establishments.

DCA's mission is to protect and enhance the daily economic lives of New Yorkers to create thriving communities. As part of this mission, DCA houses the Office of Financial Empowerment (OFE), which assists New Yorkers with low incomes by developing and offering innovative programs and services to increase access to high-quality, low-cost financial education and counseling, safe and affordable mainstream banking, and access to income-boosting tax credits and savings. OFE works to educate, empower, and protect New Yorkers and their communities so they can improve their financial health and assets.

Individuals who lack access to basic financial tools like a checking or savings account, or who are forced to rely on alternative financial services like check cashers, face significant challenges in managing and improving their financial health. These individuals may have a harder time building savings and assets or, as the bills before this committee recognize, even purchasing basic goods or services at businesses that implement cashless payment policies. Barriers like these can make it harder for some to participate fully in the vibrant local economy that has made our city an engine for opportunity for so many New Yorkers.

DCA is strongly committed to expanding financial access for all New Yorkers. In 2015, DCA commissioned the Urban Institute to examine how many New Yorkers are unbanked or underbanked and provide a snapshot of which communities are most affected by lack of financial access. The study found that roughly one in every nine New York City households does not have a bank account.<sup>1</sup>

More than one in four New York City households are underbanked, meaning that they have a checking or savings account but still rely on some place other than a bank to cash a check, purchase a money order, transfer money internationally, or complete some other financial service.<sup>2</sup> In total, roughly one million New York City households are considered unbanked or underbanked.<sup>3</sup>

The study also found that these households are not evenly distributed. Compared to New York City as a whole, Bronx households were more than twice as likely to be unbanked, with 21.8% reporting that they did not have a bank account against 11.7% for New York City overall.<sup>4</sup>

Neighborhoods in the Bronx and Brooklyn consistently exhibited the highest rates of lack of access. In fact, a 2008 OFE study found that New Yorkers in just two neighborhoods, Melrose in the Bronx and Jamaica in Queens, spent approximately \$19 million in check cashing fees annually.<sup>5</sup> Across the city, New Yorkers spend \$225 million in check cashing fees every year. Alternative financial services firms like check cashers extract huge sums of money from our hardest working New Yorkers, causing substantial harm to their financial health.<sup>6</sup>

In a separate study also commissioned by DCA, the Urban Institute examined data about how New Yorkers themselves feel about their own financial security.<sup>7</sup> This study found that perceived financial insecurity was similarly concentrated in certain parts of the city. For example, 36.4% of Bronx residents reported feeling financially unsatisfied, several points higher than the national rate of 31.9%, while only 22.3% of Staten Island residents felt this way.<sup>8</sup>

All of this research underscores how important OFE's work to promote financial inclusion and expand access to safe and affordable financial products is to New Yorkers. It is absolutely critical that the City take a lead role in helping our residents achieve financial health, connecting them to secure, quality banking products and reducing their need to rely on cash, and thus reduce the tremendous negative impact of check cashing and similar establishments. The de Blasio administration believes that it is critically important to keep our focus on promoting financial inclusion, expanding access to safe and reliable financial products, and protecting consumers from predatory and deceptive financial practices.

The core of DCA's work in this area is rooted in OFE's Financial Empowerment Centers, the first of which opened in the Bronx in 2008. Today, there are more than twenty Financial Empowerment Centers across the five boroughs providing free, confidential, one-on-one counseling with professional financial counselors who can help New Yorkers open a bank account, tackle debt, improve credit, and save and plan for a stable financial future. Since the creation of Financial Empowerment Centers, OFE has conducted over 100,000 financial counseling sessions, helping over 52,000 New Yorkers improve their financial health, reduce their debt by \$65 million, and increase their savings by \$5.1 million. OFE has also helped New Yorkers file more than 1 million tax returns for free, helping clients to claim refund-boosting tax credits and saving \$150 million in preparation fees. Finally, OFE has helped New Yorkers open more than 30,000 bank and credit union accounts through our financial counseling and coaching programs, the IDNYC program, and other programs promoting banking access.

### *Cashless Businesses*

Cashless retail and food services businesses are a relatively new phenomenon in New York City. A few years ago, businesses that opted not to accept cash for payment might have been considered unusual. Today, ubiquitous New York City restaurants like Dig Inn,<sup>9</sup> Dos Toros,<sup>10</sup> and Sweetgreen<sup>11</sup> have gone cashless. According to the *New York Times*, reporting in 2017, "cashless is fast on its way to becoming normal."<sup>12</sup> The emergence and growth of cashless businesses has raised questions about the impact these policies have on financial inclusivity, particularly for communities with significant unbanked and underbanked populations.

Recent research supports the idea that the way consumers pay for goods and services is changing. According to Gallup, Americans today use cash less frequently than they did five years ago,<sup>13</sup> and a report by the Federal Reserve System found that consumer preference for credit cards has increased in recent years.<sup>14</sup> That report also found that debit and credit cards are now the most commonly used means of payment, while cash continues to be widely and frequently used by consumers.<sup>15</sup> In 2017, debit and credit cards were the payment method for 48% of all purchases, with cash accounting for 30% of purchases.<sup>16</sup> However, cash accounts for nearly half of transactions for households making under \$25,000 annually.<sup>17</sup>

Proponents of cashless payment policies cite purported benefits like streamlining checkout processes,<sup>18</sup> freeing up employee time spent on counting, managing, and securing cash,<sup>19</sup> and reducing the risk of theft associated with managing and transporting cash.<sup>20</sup> One New York City restaurateur estimated that accepting cash would force him to increase prices at least 10%.<sup>21</sup> Credit card companies like Visa, which collect processing fees from merchants who accept their cards from consumers, have even encouraged businesses to explore going cashless by offering assistance to upgrade payment technology and other incentives.<sup>22</sup>

Concerns about cashless payment policies have focused on the potential to exclude unbanked households. Critics have pointed out that consumers without bank accounts will be unable to purchase goods and services from cashless businesses, presenting new barriers to full participation in the local economy.<sup>23</sup> Others have argued that “basic service industries. . . have an obligation to be inclusionary and accessible to everyone,” which should include accepting cash.<sup>24</sup> Critics have also noted that households of color may be disproportionately affected by cashless payment policies because they are more likely to lack access to a bank account.<sup>25</sup> Responding to these concerns, some jurisdictions have considered or implemented prohibitions on cashless payment policies. Massachusetts law has required retail establishments offering goods and services to accept cash since 1978<sup>26</sup> and New Jersey,<sup>27</sup> Chicago,<sup>28</sup> Philadelphia,<sup>29</sup> and Washington D.C.<sup>30</sup> have all considered similar bills.

According to the Federal Reserve, “[t]here is. . . no Federal statute mandating that a private business, a person, or an organization must accept currency or coins as payment for goods or services. Private businesses are free to develop their own policies on whether to accept cash.”<sup>31</sup> Local law does not currently prohibit businesses from adopting cashless payment policies. However, DCA’s position is that if a business chooses to adopt such a policy, it should clearly disclose the restrictions on payment options to consumers.

#### *Introductions 1023-2018 & 1281-2018*

I will now turn to the bills before the committee today, which represent differing responses to the emergence of cashless businesses. Intro. 1023 would require retail establishments that do not accept payment in cash from consumers to clearly post signage informing consumers of their cashless payment policy at all consumer entrances or adjacent to cashiers or payment kiosks. Violations would be punishable by civil penalties of \$25 to \$250. Intro. 1281 would prohibit retail and food service establishments from adopting policies in which they refuse to accept payment in cash from consumers. Violations would be punishable by civil penalties of \$250 to \$500.

DCA believes that the City should focus its efforts on promoting financial inclusion by connecting unbanked and underbanked New Yorkers to safe and affordable financial products. For these New Yorkers, the financial challenges go further and deeper than an inability to use cash to purchase goods and services at retail. Prohibiting these businesses from transitioning to cashless payments might treat one symptom of financial exclusion, but it would not remedy the cause- lack of access to payment options other than cash. DCA believes that in an increasingly cashless world, helping New Yorkers get access to a bank account and other financial tools to help them build a secure financial future is the most important priority. That is why we are so proud of the exemplary work done by OFE and the concrete results those initiatives have achieved for New Yorkers. We hope the Council will remain a strong partner as we continue to pursue these goals.

At the same time, OFE's research and experience suggest that more payment options are generally better for low and moderate income New Yorkers. For that reason, DCA supports a policy that promotes financial inclusion and access by requiring businesses to accept cash. While we share the inclusionary goals embodied in Intro. 1281, we also believe that any such policy should be responsive to the real-world concerns and experiences of consumers, workers, and businesses affected by evolving payment options and business practices. We look forward to working with the Council to address these and other issues through the legislative process.

DCA commends the Council for holding this hearing, which we think is part of an important and ongoing dialogue about cashless payment policies in New York City. The de Blasio administration is firmly committed to pursuing policies that protect and promote the financial health of low and moderate income New Yorkers, particularly those who are part of vulnerable communities. We are always eager to work with the Council to encourage businesses to help make our economy fully accessible and inclusive of all New Yorkers. DCA looks forward to hearing from New Yorkers who have interacted with cashless establishments, businesses who have adopted or are considering adopting cashless payment policies, and advocates, experts, and organizations that focus on promoting financial inclusion.

Thank you for the opportunity to testify today. I am now happy to answer the committee's questions.

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<sup>1</sup> CAROLINE RATCLIFFE ET AL., URBAN INSTITUTE, WHERE ARE THE UNBANKED AND UNDERBANKED IN NEW YORK CITY? 3 (2015), available at <https://www.urban.org/sites/default/files/publication/71511/2000430-Where-Are-the-Unbanked-and-Underbanked-in-New-York-City.pdf>.

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

<sup>3</sup> *Id.* at 2.

<sup>4</sup> *Id.* at 3.

<sup>5</sup> N.Y.C. DEP'T CONSUMER AFFAIRS, NEIGHBORHOOD FINANCIAL SERVICES STUDY 3 (2008), available at <https://www1.nyc.gov/assets/dca/downloads/pdf/partners/Research-NFSS-ExecutiveSummary.pdf>.

<sup>6</sup> *Id.* at 7.

<sup>7</sup> CAROLINE RATCLIFFE ET AL., URBAN INSTITUTE, HOW DO NEW YORKERS PERCEIVE THEIR FINANCIAL SECURITY? (2015), available at <https://www1.nyc.gov/assets/dca/CitywideFinancialServicesStudy/Financial-Security-Brief.pdf>.

<sup>8</sup> *Id.* at 5.

<sup>9</sup> *Why We're a (Mostly) Cash-Free Restaurant Group*, DIG INN, <https://www.diginn.com/cashfree/> (last visited Feb. 13, 2019).

<sup>10</sup> Trent Gillies, *Restaurants Embrace the Future, Getting Patrons to Pay Without Cash*, CNBC (Jan. 27, 2018, 3:01 PM), <https://www.cnbc.com/2018/01/26/cashless-technology-catches-on-at-restaurants.html>.

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- <sup>11</sup> Jeff John Roberts, *Why a Popular Salad Chain Stopped Using Cash*, FORTUNE (Sept. 14, 2017), <http://fortune.com/2017/09/14/sweetgreen-cashless/>.
- <sup>12</sup> Andy Newman, *Cash Might Be King, but They Don't Care*, N.Y. TIMES (Dec. 25, 2017), <https://www.nytimes.com/2017/12/25/nyregion/no-cash-money-cashless-credit-debit-card.html>.
- <sup>13</sup> Art Swift & Steve Ander, *Americans Using Cash less Compared with Five Years Ago*, GALLUP (July 12, 2016), <https://news.gallup.com/poll/193649/americans-using-cash-less-compared-five-years-ago.aspx>.
- <sup>14</sup> RAYNIL KUMAR ET AL., CASH PRODUCT OFFICE, FEDERAL RESERVE SYSTEM, 2018 FINDINGS FROM THE DIARY OF CONSUMER PAYMENT CHOICE 7 (2018), available at <https://www.frbsf.org/cash/files/federal-reserve-cpo-2018-diary-of-consumer-payment-choice-110118.pdf>.
- <sup>15</sup> *Id.* at 5.
- <sup>16</sup> *Id.*
- <sup>17</sup> *Id.* at 9.
- <sup>18</sup> Newman, *supra* note 10.
- <sup>19</sup> *Id.*
- <sup>20</sup> See, e.g., Anne Kadet, *Card-Only Businesses Have Swiped Away Cash-Paying Customers*, WALL ST. J. (Jan. 15, 2019, 11:33 AM), <https://www.wsj.com/articles/card-only-businesses-have-swiped-away-cash-paying-customers-11547569980>.
- <sup>21</sup> *Id.*
- <sup>22</sup> Jackie Wattles, *Visa Offers Restaurants \$10,000... If They Stop Accepting Cash*, CNN (July 13, 2017, 5:30 PM), <https://money.cnn.com/2017/07/14/news/companies/visa-no-cash-restaurant-initiative/index.html>.
- <sup>23</sup> See, e.g., Nadra Nittle, *Why Cashless Retailers Put Low-Income People at Even More of a Disadvantage*, VOX (Nov. 30, 2018, 2:00 PM), <https://www.vox.com/the-goods/2018/11/30/18119887/cashless-stores-cash-only-low-income-disadvantage>; Henry Grabar, *No Shirt, No Swipe, No Service*, SLATE (July 24, 2018, 5:24 PM), <https://slate.com/business/2018/07/cashless-stores-and-restaurants-are-on-the-rise-to-the-delight-of-credit-card-companies.html>; Melissa McCart, *The Problem With Cashless Restaurants*, EATER (Feb. 15, 2018, 10:29 AM), <https://www.eater.com/2018/2/15/16974980/cashless-restaurants-credit-card-only-legal-problem-discriminatory>.
- <sup>24</sup> Robert Reed, *To Avoid City Backlash, Restaurants and Retailers Should Dump Cashless Ways*, CHI. TRIB. (Oct. 19, 2017, 5:00 AM), <https://www.chicagotribune.com/business/columnists/reed/ct-biz-cashless-ordinance-discrimination-robert-reed-20171018-story.html>.
- <sup>25</sup> FED. DEPOSIT INS. CORP., FDIC NATIONAL SURVEY OF UNBANKED AND UNDERBANKED HOUSEHOLDS 3 (2017), available at <https://www.fdic.gov/householdsurvey/2017/2017report.pdf>.
- <sup>26</sup> MASS. GEN. LAWS ch. 255D, § 10A (2017).
- <sup>27</sup> A591, 218<sup>th</sup> Gen. Assemb. (N.J. 2018), available at <https://www.njleg.state.nj.us/bills/BillView.asp?Session=LIS2018&BillNumber=A591#>.
- <sup>28</sup> Ordinance O2017-7145, Chi. City Council (Ill. 2017), available at <https://chicago.legistar.com/LegislationDetail.aspx?ID=3184725&GUID=06C6F98D-8311-4DA2-93E2-D8E75B84D737>.
- <sup>29</sup> Bill No. 18094301, Phila. City Council (Pa. 2018), available at <https://phila.legistar.com/LegislationDetail.aspx?ID=3710586&GUID=FD85947F-8151-4DB5-9949-AF6FEF14A9C9>.
- <sup>30</sup> Bill No. B23-0122, D.C. City Council (D.C. 2019), available at <http://lms.dccouncil.us/Legislation/B23-0122>.
- <sup>31</sup> FAQs, BOARD OF GOVERNORS OF THE FED. RES. SYS., [https://www.federalreserve.gov/faqs/currency\\_12772.htm](https://www.federalreserve.gov/faqs/currency_12772.htm) (last visited Feb. 13, 2019).

To whom it may concern,

We went into this business because we wanted to share with our guests the California style Mexican cuisine that we grew up loving, not because we wanted to be cashless. We are only interested in being cashless because it allows us to serve our guests more smoothly, operate more efficiently and significantly enhances our ability to improve our team training and morale - and by extension to create a more compelling guest experience, which is the entire goal of hospitality. Going cashless has been enormously helpful in these respects.

We think of ourselves as ethical corporate members of our community and take pride in doing the right thing. We partner closely with South Bronx United to help kids go to college, we've donated over 100,000 meals over the years to the New York Food Bank in addition to volunteering our time, and we've not just made financial contributions but have directly worked with Getting Out and Staying Out to employ and offer career opportunities to formerly incarcerated individuals. We try to do right by the environment by sourcing only naturally raised proteins and composting all kitchen food waste. Most significantly, we employ over 500 amazing team members, and are proud to pay them \$15 dollars an hour, and in most cases more than that, along with other benefits and real opportunities for growth and career advancement. I should add that we strongly encourage our new team members to start a bank account if they don't already have one, and set up direct deposit for their paycheck. We think people ought to be encouraged to join the banking system, rather than be taken advantage of by check cashing services.

We are only able to do all these things if we have a sustainable business model.

I want to emphasize that we are enthusiastic supporters of the \$15 minimum wage and welcome the opportunity to pay our team members a living wage, in a level competitive environment. But make no mistake, the higher minimum wage puts significant pressure on our bottom line. For a business, running an efficient operation is the difference between staying open or shutting down.

If you've walked around New York City recently, you will see many vacant storefronts. Business survival is not a given, and we feel that new laws should not be introduced to make running a healthy business even more challenging than it already is.

I think it's worth pointing out that Massachusetts has an existing rule against being cashless, and it's one additional reason that when we decided to expand into a second market, we chose Chicago rather than Boston.

There are other arguments against this legislation that I would like to mention briefly:

We believe it is safer for our team to not deal with cash. We have been robbed twice previously, and not once since going cashless.

It is expensive for us to pay for armored car service, buy straps of change, and spend hours of our restaurant leaders time setting up cash drawers, counting drawers, re-counting drawers, dealing with deposit slips and bags, paying bank fees to accept cash, and having to discipline or even fire team members over cash discrepancies.

We pay all taxes owed, on all revenue received. Which is definitely not happening at certain establishments, particularly businesses that are cash only. This would seem like a very positive thing for the city.

The entire internet and all of e-commerce is cashless, as are all apps, airlines, and many government services. Why are we being held to a different standard?

We think it's clear that the future of currency is electronic, and things are moving in that direction already in many parts of the world, including India, China, Sweden, Denmark, Norway, and the UK.

In the meantime, businesses that consistently serve the unbanked and underbanked population aren't going to go cashless. It wouldn't make sense for them. And if someone without a bank account wants to patronize a cashless business, they can convert cash to a prepaid card at many convenience stores, such as Walgreens or Duane Reade.

We sympathize with wanting to protect members of our community that are more socioeconomically challenged, but this is not the way to accomplish that goal. Let's pull those members of our community forward into the modern financial system, rather than pulling the business community backward with a well-intentioned but ill-advised and burdensome regulation.

Thank you for your consideration,

Leo Kremer  
Dos Toros Taqueria



**Testimony Before the New York City Council Committee on  
Consumer Affairs and Business Licensing  
February 14, 2019**

**Delivered by Andy Collado, Assistant Director of Services  
The Financial Clinic**

**RE: Int. 1281 - In relation to prohibiting retail establishments from refusing to accept payment**

Good morning. My name is Andy Collado, and I am the Assistant Director of Services at The Financial Clinic. Founded in 2005, The Financial Clinic builds the financial security of working poor New Yorkers by providing free, 1-on-1 financial coaching in collaboration with nonprofits and social service agencies across the city. Our job is to meet financially insecure people where they are, support and empower them to achieve the financial goals that matter the most to them, and to help them navigate the many systemic economic barriers that keep them from living secure and prosperous lives.

I would like to start by thanking committee Chair Espinal, and the other members of the Consumer Affairs Committee, for holding today's hearing, and for the opportunity to give testimony in support of regulating the ability of retail establishments to refuse cash payment (Int. 1281). I would also like to thank Councilmember Torres for taking, seriously, the unequal impact that cashless businesses have on many New Yorkers and for introducing this bill.

I feel lucky that I get to go to work every day as a financial coach. I have the opportunity to see the challenges and barriers affecting financially insecure New Yorkers, challenges and barriers that others might miss. I am especially attuned to these issues, being a first generation American myself, a proud son of Dominican immigrants. At first glance, an issue like shops and restaurants going cashless might not seem like a big deal to most people. But for a significant number of New Yorkers, new immigrants, our undocumented, the low and mid-income many, it means they are unable to shop at the same stores or restaurants as everyone else. This may start with a restaurant but trickles quickly become floods. It means they are effectively cut off from participating in the economic systems that can mean the difference between food or water for dinner, clothes on their backs, or roofs over their heads.

It's perhaps worth pointing out that, reports of the death of cash notwithstanding, recent data from the Federal Reserve shows that consumers still use cash more frequently than any other form of payment.<sup>1</sup> Cash is overwhelmingly the preferred way to pay for purchases under \$25, and

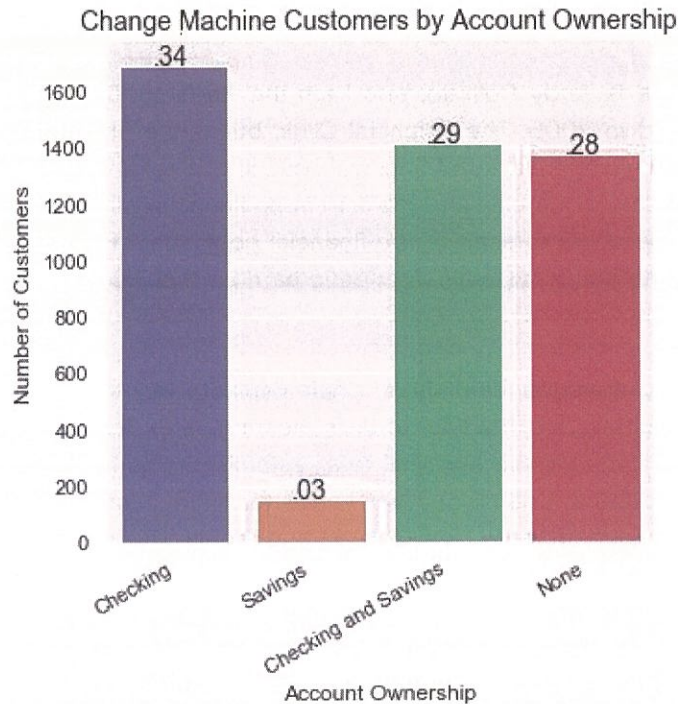
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<sup>1</sup> "2018 Findings From the Diary of Consumer Payment Choice" *Federal Reserve Bank of San Francisco*. 2018.



the method used most often in general by lower income folks and people over 65. Something I re-confirm every day.

Of course, New Yorkers do not always rely on cash, out of preference. Many in the city do not own a bank account. Data on banking status collected from nearly 5000 low-income New Yorkers we have served across the city shows that **28%** of them report not owning a bank account.<sup>2</sup>



Research commissioned by the City’s Office of Financial Empowerment, with whom we are grateful to partner to provide financial coaching services across the city, shows that nearly 12% of New York City households are unbanked, compared with about 6.5% of households nationally. In the Bronx, the number of unbanked households is nearly 22%.<sup>3</sup>

<https://www.frbsf.org/cash/publications/fed-notes/2018/november/2018-findings-from-the-diary-of-consumer-payment-choice/>

<sup>2</sup> These data are collected from customers during financial coaching appointments using The Financial Clinic’s online coaching platform Change Machine. To learn more about Change Machine visit [www.change-machine.org](http://www.change-machine.org)

<sup>3</sup> “2017 FDIC National Survey of Unbanked and Underbanked Households” *Federal Deposit Insurance Corporation*. October 2018. <https://www.fdic.gov/householdsurvey/2017/2017report.pdf> ; Caroline Ratcliffe, Signe-Mary McKernan, Emma Kalish and Steven Martin. “Where Are the Unbanked and Underbanked in New York City?” *Urban Institute an NYC Office of Financial Empowerment*. 2015.

The poor, the undocumented, and people of color are disproportionately more likely to be unbanked and face greater barriers to opening up credit and debit cards (because they lack a social security number or have poor credit or Chexsystems profiles). These groups are effectively locked out of patronizing a shop or restaurant that chooses to go cashless. The impact on these communities alone should give us pause. The gains in time, efficiency, or “customer experience” that opponents of these regulations purport surely are not worth the exclusion imposed on our friends and neighbors.

I want to take a moment to highlight the unique impact of the cashless trend on the undocumented. As the members of this committee no doubt are aware, New York City is home to over half a million undocumented immigrants and The Financial Clinic is proud to serve hundreds of them through our partnerships with organizations like Make the Road.<sup>4</sup> They are vital members of our communities, they are small business owners, they are our family members, and our friends.

According to the Fiscal Policy Institute, undocumented immigrants in New York contribute over a **billion dollars** every year in state and local taxes.<sup>5</sup> Thanks to Mayor de Blasio and the members of this City Council, the ID NYC allows many undocumented New Yorkers to get a bank account. Their options though are not unlimited - less than 30% of banks accept ID NYC for the purpose of opening a bank account - and in the current national climate you could understand a healthy skepticism in the immigrant community of sharing their personal information with anyone, even a bank. I have yet to sit with an undocumented New Yorker who knew they could open an account with the NYC ID. So should we accept, as opponents of these rules do, that there will be some places where undocumented New Yorkers just will not be able to shop?

Lastly, it’s important to be clear that this issue is not just about pitting the unbanked against the banked, though that should be a critical concern. There are also many New Yorkers that own bank accounts but for any number of reasons mostly need - or just prefer - to use cash. Tipped workers, for example, see much more of their income in cash. Here too though there is a dynamic of inequality. Many New Yorkers are forced to rely mostly on cash because it is inconvenient or impractical for them to regularly visit a bank or ATM because there is not one near them.

A 2015 report by the New York City Comptroller’s office found that majority white neighborhoods have over 3 times more bank branches per 1000 residents than neighborhoods that are majority

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<https://www.urban.org/sites/default/files/publication/71511/2000430-Where-Are-the-Unbanked-and-Underbanked-in-New-York-City.pdf>

<sup>4</sup> “Economic Contribution, Taxes Paid, and Occupations of Unauthorized Immigrants in New York State” *Fiscal Policy Institute*. March 2017.

<http://fiscalpolicy.org/wp-content/uploads/2017/03/fpi-brief-on-undocumented.pdf>

<sup>5</sup> *Ibid.*



non-white. The same report finds that the Bronx has fewer bank branches per resident than any county in the nation.<sup>6</sup>

In Sunset Park, where our offices are located, there is only 1 bank branch to serve every 8,500 residents. When payday comes or maybe that tax refund check, many underbanked customers in these neighborhoods will go to one of the city's many check cashers because paying the fee is easier for them than getting to their bank. Forty-three percent (43%) of the customers The Financial Clinic assists with filing their taxes do not use direct deposit for their tax refund. And when they've cashed that check, they turn around and buy food, right? Can we agree that access to that food should be a human right? And that they should never be turned away for not providing a piece of plastic?

I strongly urge this committee to end this discriminatory practice, protect all New Yorkers' right to pay for food or services in the way that is right for them, and **pass Introduction 1281**. Thank you for your time and attention this morning.

For more on The Financial Clinic and our work please visit <http://www.thefinancialclinic.org>.

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<sup>6</sup> "Take It to the Bank: A New Yorker's Guide to Affordable Checking Options" *Office of the New York City Comptroller*. 2015. <https://comptroller.nyc.gov/takeittothebank/report.html>

**TESTIMONY OF JULEON ROBINSON, PROGRAM ASSOCIATE  
NEW ECONOMY PROJECT**

**To the NYC Council Committee on Consumer Affairs and Business Licensing**

February 14, 2019

Thank you Committee Chair Espinal and other members of the Committee for the opportunity to testify today. My name is Juleon Robinson and I represent New Economy Project, an economic justice organization that works with community groups and low income New Yorkers throughout New York City.

New Economy Project's mission is to build a just economy, based on cooperation, racial, economic, and gender justice, and ecological sustainability. Since our organization's founding in 1995, we have worked with hundreds of grassroots groups to challenge Wall Street banks and other corporations that harm New Yorkers and perpetuate poverty, inequality, and segregation. We also work with groups to build democratically-structured, community-controlled initiatives, including community land trusts and mutual housing, worker and financial co-ops, and more.

New Economy Project supports Intro. 1281, sponsored by Council Member Ritchie Torres, prohibiting retail establishments from refusing to accept payments in cash. The emerging trend by some businesses to no longer accept cash payments is disturbing on many fronts: It has a discriminatory impact on low-income New Yorkers who face barriers to fair banking access, and people who reside in communities of color that banks continue to redline; it promotes a shift to inferior and poorly-regulated digital payment, prepaid cards, and other non-bank services; and it requires people to cede even more personal information to large companies, exposing them to privacy and surveillance risks.

This morning, I will focus on the following:

- Persistent bank redlining in NYC neighborhoods of color;
- Concerns about financial technology (fintech) companies and the emerging cashless economy; and,
- The need for bold solutions to address our two-tiered financial system, which serves to perpetuate poverty, inequality and segregation in NYC.

*Persistent Redlining In NYC Neighborhoods Of Color*

**Cashless retail outlets effectively reinforce the systemic inequities in our financial system and economy at large. They present New Yorkers who live in redlined communities with two bad options: either purchase a high-cost, under-regulated financial product, like a prepaid card, or be left unable to make purchases at all.**

As the attached map shows (see Map 1), there is a glaring lack of bank branches in New York City's communities of color. The map controls for neighborhood population, showing the number of bank branches for every 10,000 people. The diagonal lines, or cross-hatching, correspond to neighborhoods in which more than 70% of the population identifies as a person of color, which includes black, Latino and Asian New Yorkers.

In NYC neighborhoods of color there is just one bank branch, on average, for every 10,000 residents, compared to 3.24 branches for every 10,000 residents in all other NYC neighborhoods.<sup>1</sup> Many communities of color in central Brooklyn, Southeast Queens, and the South Bronx have access to less than one bank branch per 10,000 residents. Some zip codes have no branches at all.

The next two attached maps (see Maps 2 and 3) beam down to the neighborhood level, comparing two neighborhoods in Manhattan that illustrate the extreme income inequality in our city: Manhattan's Upper East Side and East Harlem. Every blue marker represents a bank branch, red dots are for check cashers, and pawnshops are yellow. As Map 3 illustrates, when banks fail to serve neighborhoods adequately—or at all—high-cost, fringe financial services like check cashers and pawn shops fill the vacuum.

Banks' failure to locate branches in communities of color contributes to huge disparities in the use of bank services by black and Latino households compared to white households. When asked how interested banks are in serving households like theirs, approximately one in four black and Latino New Yorkers responded, 'Not at all,' compared to just 13% of white New Yorkers who gave this response.<sup>2</sup>

People excluded from the banking system incur not only immediate financial costs, but also long-term setbacks. Lack of a banking or credit history, in particular, can unfairly block people from housing, affordable insurance and other economic opportunities, as growing numbers of landlords, insurance companies and others evaluate and often discriminate against people on the basis of their credit histories.

### *Concerns About Financial Technology and the Emerging Cashless Economy*

**Cashless businesses, by their very nature, create an exclusive marketplace in which New Yorkers must accept the terms and conditions of private entities in order to participate. In refusing to accept cash, cashless businesses employ credit card companies, financial technology ("fintech") companies, and others to handle payment processing. Requiring people to rely on this private infrastructure simply to buy school supplies, food or medicine, for example, grants an inordinate amount of power to corporations that are more accountable to their investors than to New Yorkers and New York City communities.**

Nationally, as a result of the persistent bank redlining discussed above and other structural inequities in our economy, close to 17% of Black households and 14% of Latino households don't have a bank account, compared to an average among white households of only 3%.<sup>3</sup> The consequences of these disparities are significant, especially as cashless businesses multiply.

Credit card and fintech companies, cashless enterprises, and other proponents of the cashless economy promote the benefits of a cashless economy without addressing the economic and racial injustice it perpetuates. Fintech companies are especially problematic. Many of these

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<sup>1</sup> See <https://www.neweconomynyc.org/resource/disparities-economic-security-new-yorkers-color-50-older/>

<sup>2</sup> 2015 FDIC National Survey of Unbanked and Underbanked Households.

<sup>3</sup> 2017 FDIC National Survey of Unbanked and Underbanked Households.

companies routinely circumvent state consumer protection laws -- including those we have in New York -- through "sham" partnerships with national and out-of-state banks; engage in risky securitization of loans; rely on broad and invasive data collection; employ racially-biased loan underwriting algorithms; and have been the subject of state and federal enforcement actions.

Especially now, as Amazon threatens to bring a wave of gentrification to Western Queens with its HQ2 development, and is considering a plan to open numerous cashless and cashier-less stores over the next few years, it is imperative that the Council look for ways to eliminate, not enhance, the serious financial burden on low-income New Yorkers and New Yorkers of color.

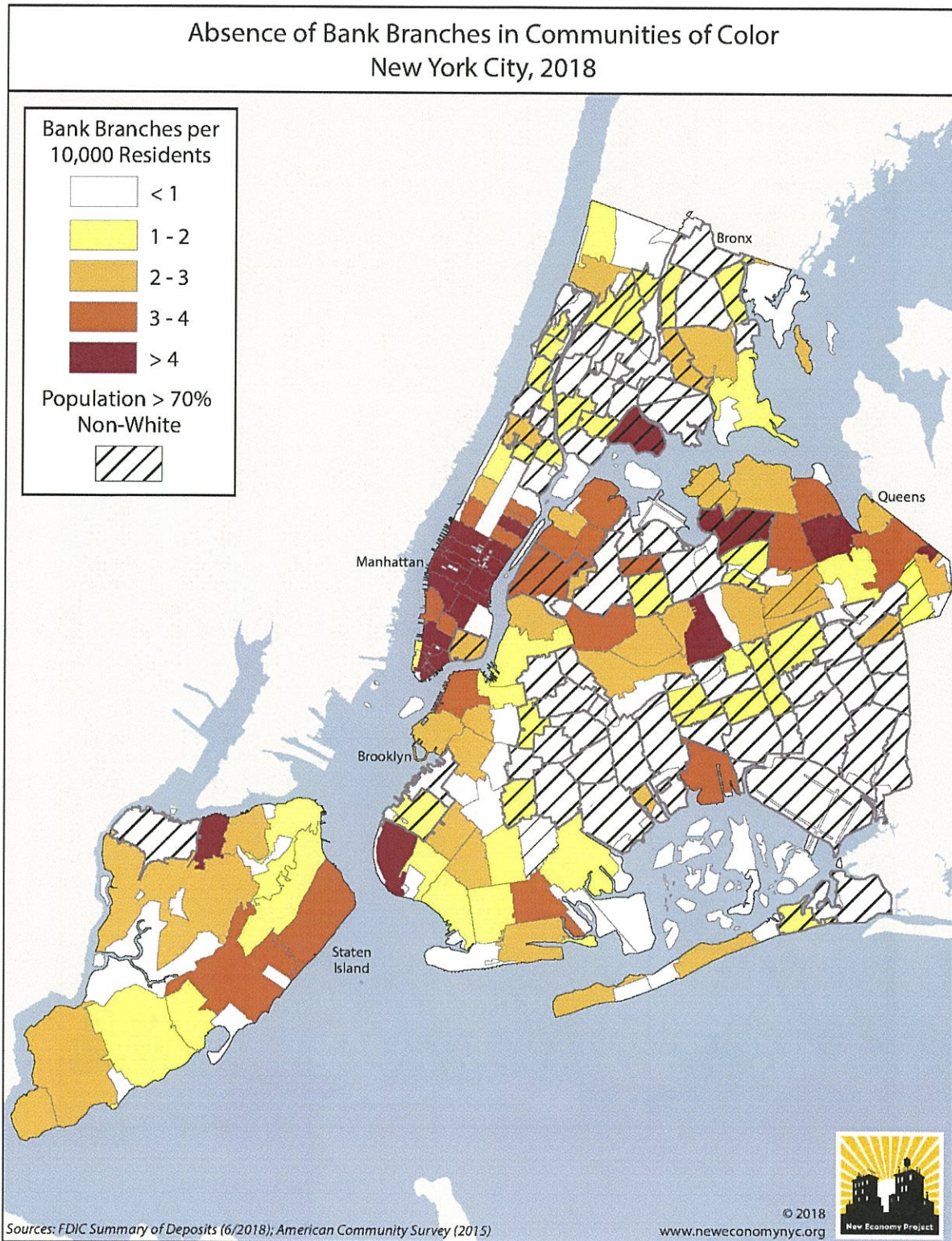
*The Need for Bold Solutions to Address Our Two-tiered Financial System, Which Perpetuates Poverty, Inequality and Segregation in NYC*

As I've outlined throughout this testimony, there are deep, structural inequities in our current financial system. Intro. 1281 is an important step in the right direction, ensuring no New Yorker will be excluded from the economy solely because they lack a credit card or bank account. The Council should support this bill as a part of a broad, bold platform to address inequality and segregation and our two-tiered financial system.

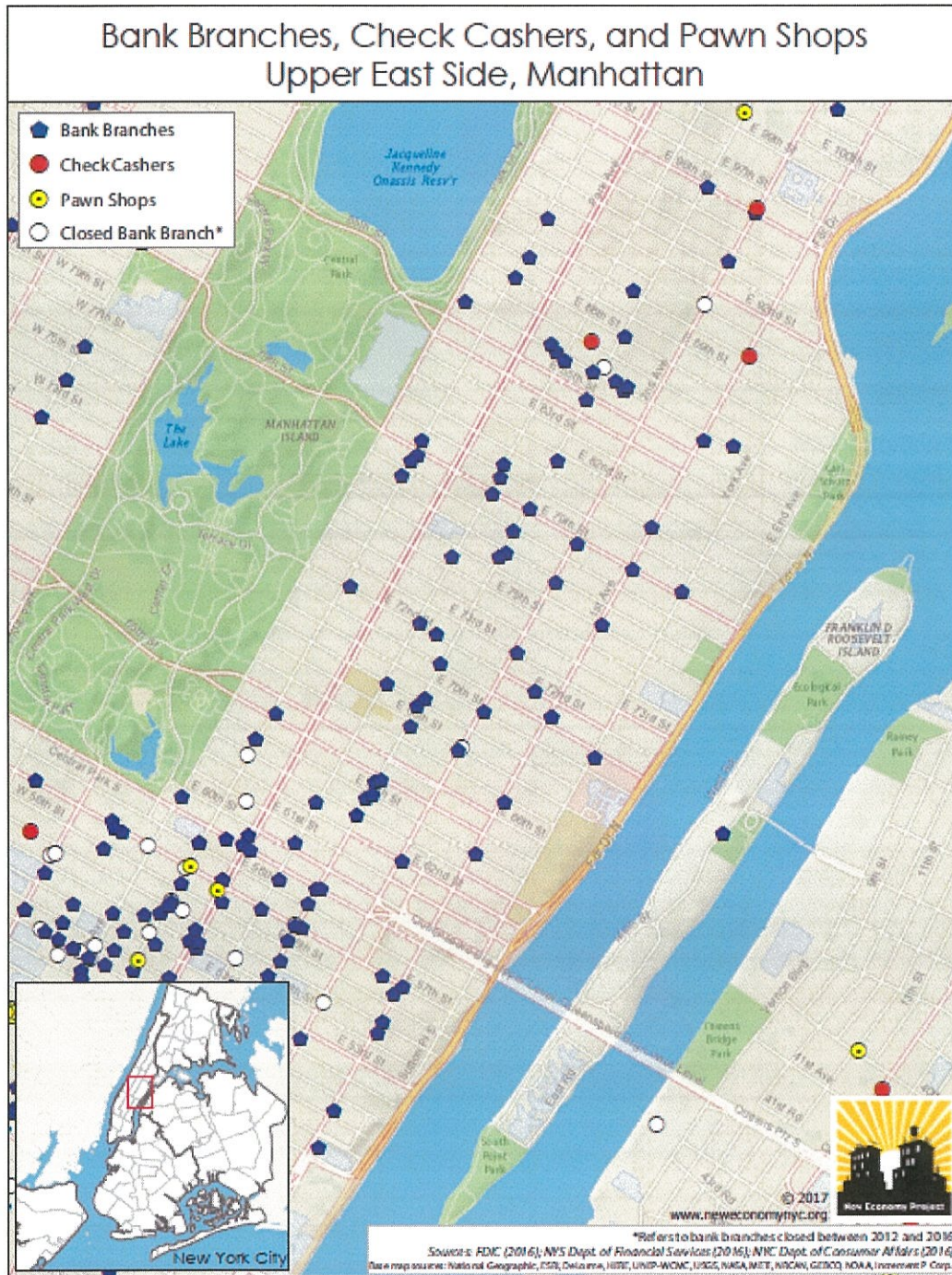
**The Council should support efforts to democratize our economy, with and for communities that have been exploited and excluded from the mainstream financial system for decades.** For example, groups around the city are actively organizing for increased funding for mission-driven community development financial institutions; for community land trusts and other non-speculative housing models; to strengthen and expand worker, food, financial, and other cooperatives; and to establish the first municipal public bank in the nation; and much more. There are many meaningful ways in which the City Council can support these efforts.

Thank you for your consideration. Please feel free to contact me with any questions: 212-680-5100 ext. 209, [juleon@neweconomynyc.org](mailto:juleon@neweconomynyc.org)

Map 1

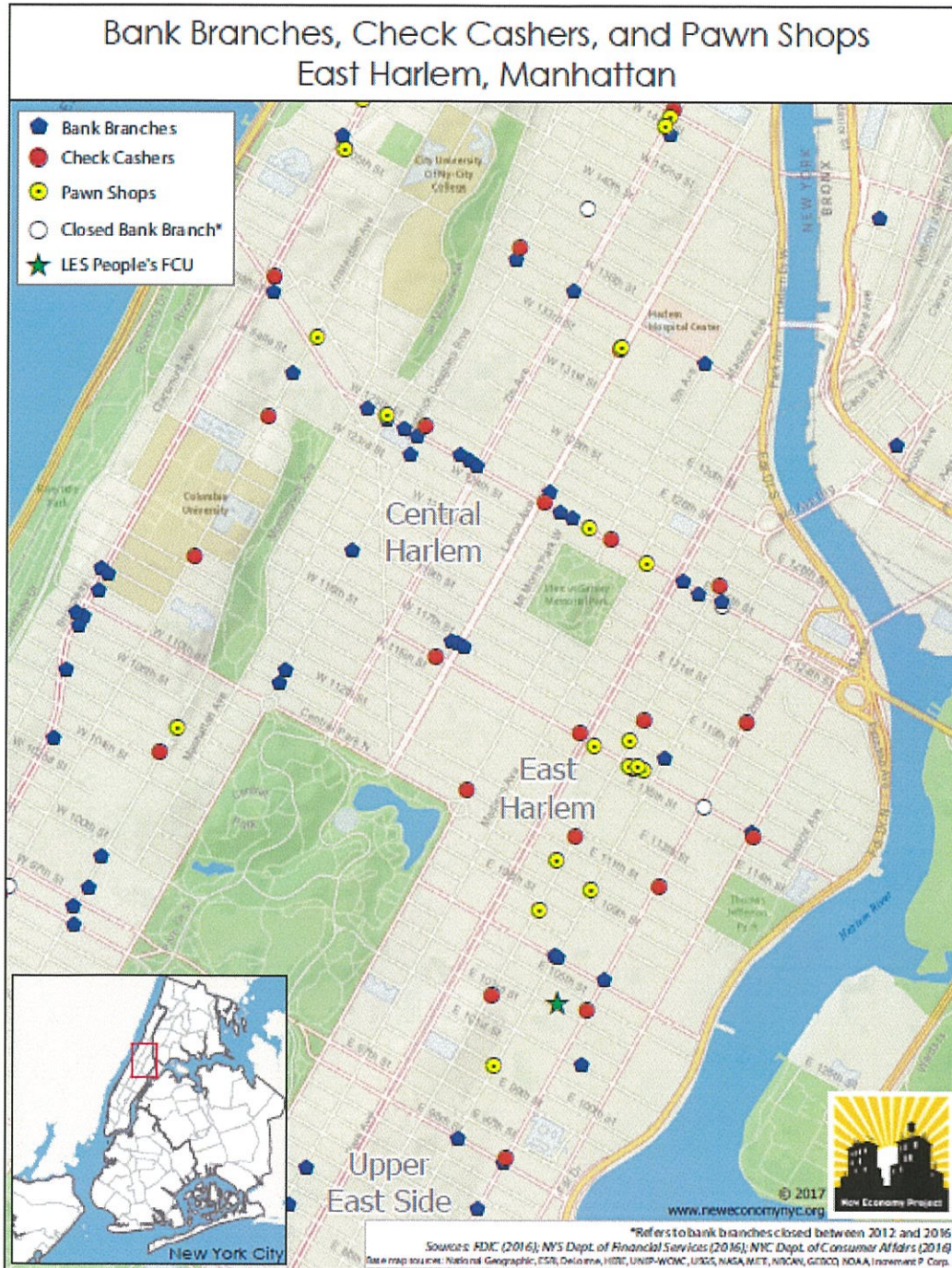


Map 2





Map 3





## **MEMO OF SUPPORT FOR BANNING CASHLESS BUSINESSES**

**Int 1281-2018** *Prohibiting retail establishments from refusing to accept payment in cash.*

The Retail, Wholesale and Department Store Union (RWDSU) respectfully submits this memo of support for Int 1281-2018, which bans retail establishments from refusing to accept cash payments.

The RWDSU represents 100,000 members, including more than 25,000 in the City of New York. These members live and work in New York City and are employed at hundreds of food and retail establishments.

### **Cashless Businesses Are Discriminatory**

More and more businesses are moving towards a cashless business model that disadvantages low-income people and people of color.

Cashless businesses do not accept cash, they only accept credit cards and debit cards. To have a credit card, a person must have a bank account. This means that people without a bank and a credit card cannot shop at these businesses, effectively excluding people from participating in the local economy. In fact, large portions of the population are unbanked or underbanked:

- Communities of color, low-income people, the disabled, and other marginalized households go unbanked at rates far higher than the national average. Close to 17% of Black households and 14% of Latinx households are unbanked, compared to an average of 6.5% nationally and an average of white households of only 3%.
- In addition, about one in five households have no credit. Without credit, you cannot access a credit card.
- Many people of color in NYC can't even find a bank branch near them. Data shows that in NYC neighborhoods of color, there is just one bank branch, on average, for every 10,000 residents, compared to 3.24 branches for every 10,000 residents in all other NYC neighborhoods.

Cashless businesses range from bookstores, to coffee shops and restaurants. It is only a matter of time before this discriminatory practice expands to other business types.

### **The Cash-Free Economy is a Scam**

Credit card companies and cashless enterprises promote the cash-free economy without addressing its financial burden on low-income New Yorkers and communities of color. Cashless institutions encourage a "FinTech Jim Crow" by restricting the places where people of color can shop, eat, and receive basic services.

By refusing to serve low-income New Yorkers and communities of color, cashless establishments carve out niches for gentrification through cash exclusion in an already unaffordable city. The growth of this field can drive up prices for communities, as cash-free

businesses pass credit card processing fees onto consumers and cash-accepting enterprises raise prices to keep up.

Cash is a public resource but debit/credit cards and other non-cash forms of payment are privately owned. Relinquishing control of currency to private interests could lead to a whole range of issues, including loss of privacy in the age of Big Data, and ultimately the privatization of currency.

### Legislative Solution

There is a simple fix to ensuring that low-income people and people of color are not disadvantaged by cashless businesses. NYC can simply ban cashless businesses.

There is precedent for this approach:

- Massachusetts has required businesses to accept cash since 1978.
- The New Jersey state legislature advanced a ban on cashless food and retail business to go before the Senate.
- Chicago attempted to ban cashless business in 2017 but failed.
- Washington DC Council drafted a bill to ban cash-free restaurants this summer.
- Philadelphia City Council recently submitted a bill to ban cashless business and amend a city ordinance that protects against discrimination.

Banning cashless businesses will not address the underlying issue that low-income New Yorkers lack adequate access to banking services. However, these issues are not mutually exclusive, and both should be addressed immediately. **We hope the City Council will move to pass this bill that would ban a cashless business model that disadvantages low-income people and people of color.**

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### **Contact persons**

Camille Rivera, RWDSU Political Director (212) 684.5300  
*For more information please contact RWDSU Political Department:  
political@rwdsu.org or (212) 684.5300.*

Good morning.

My name is Michelle Gauthier. I've lived in New York for 20 years and I own 5 fast casual restaurants called Mulberry & Vine.

I am opposed to bill #1281-2018 entitled Prohibiting retail establishments from refusing to accept payment in cash.

I went cashless in April of 2016 solely for the benefit of my employees. The management of cash can be an incredible burden. We close at 9pm and my employees were consistently getting out around 11pm dealing with the cash drawer reconciliation. Once I went cashless, my employees were out by 9:30pm. Another factor in my decision to go cashless was the multiple bank runs a week to get the correct change. Tellers have been taken over by kiosks so the wait for a teller can be anywhere from 5 minutes to 20 minutes. We are a busy, lunch-driven restaurant and it was very stressful for my employees not knowing how long the 'bank run' would take.

Going cashless has certainly produced other unintended benefits (faster moving line, simplified bookkeeping) but my original intention – to take away unnecessary stress from an incredibly stressful job – has been a huge win for my employees.

It saddens me that a decision that was made for the best interest of my employees could be misconstrued as classist or discriminatory. Many of my employees are the same people I'm supposedly discriminating against yet they wholeheartedly agree with my decision to go cashless.

Our cashless policy was never intended to upset, embarrass, or lose a customer nor to be political. It just simply works a whole lot better for us. While we do not accept cash as a form of payment, we have never turned away a customer. We make accommodations for anyone who wants our food and we do it with a smile on our face.

I'm a full-time single parent of two and a small business owner in New York City. I'm in a very tough industry and removing the management and burden of cash was one of the best decisions I've ever made. I urge you to oppose this bill.

Thank you very much for your time.

Sincerely,

Michelle Gauthier  
Founder/CEO Mulberry & Vine  
631 603 9064



## by CHLOE statement to the NYC City Council

February 14, 2019

by CHLOE is a plant-based fast casual restaurant chain with 13 locations, including 6 in New York City. We are a female-founded company that first opened in July of 2015 and we have created over 240 jobs in the New York Metro area. Caring for our employees has always been a priority to us; we have a track record of promoting from within and have offered health insurance benefits that exceed minimum requirements since our inception.

by CHLOE operates as a cashless restaurant at all New York City locations. When we first opened our restaurants, we accepted cash in addition to payment cards but we transitioned all of our locations to be cashless throughout the fall of 2017. Just before the transition cash represented less than 10% of our total transactions (predominately tourists). We closely monitored for any customer feedback regarding the new policy and the transition was very smooth with minimal customer complaints.

The primary reason we decided to go and continue to stay cashless is for the **benefit and safety of our employees**. By not keeping any cash in our stores our employees feel safer, especially in our pre-opening and closing hours when our stores are relatively empty. Although we know it is unlikely, news reports of local restaurants being robbed at gun point create cause for concern. There have been instances of robbery within blocks of several of our locations, including the fall 2016 robbery at sweetgreen's Union Square location and the summer 2018 robbery of Adalya on Irving Place. Not keeping cash in our stores is an easy way for us to help our employees feel more comfortable at work.

Importantly, going cashless is aligned with our mission of using plant-based foods as a platform for **sustainability**. The environmental benefits may seem small, but going cashless has helped us further reduce our carbon footprint.

According to the 2017 FDIC National Survey of Unbanked and Underbanked Households, the unbanked population has declined to 6.5%, it's lowest level since the survey was initiated in 2007. The increasing availability of prepaid cards and mobile penetration further increases accessibility to digital payments. As digital payments become increasingly prevalent, we believe that our choice to be cashless is the best one for our employees, our customers, and our business. We aspire to be inclusive and welcome everyone to eat at by CHLOE. We empower our managers to make reasonable accommodations whenever possible for customers with only cash.



Hello – my name is Jillian Grossberg and I have worked at the Bleecker Street by CHLOE since November 2016. I am a front of house team member, so I work the register and help take our customers' orders.

We used to accept cash when I first started. I remember when we stopped we didn't get any customer complaints. Everyone who came in and tried to pay by cash was okay with using a card when we told them about our new policy.

I mostly work the opening shift. There aren't many guests for breakfast so the store is really empty - sometimes it is just me and one other person in the front of the restaurant setting up for the day. You hear about restaurants in New York getting robbed sometimes. I feel a lot safer knowing that we don't have cash in the building. We also do not have to worry about theft, and our tips being stolen from tip jars, as it happened in the past.

It also took longer to check people out who paid with cash because I had to count money and make change. Checking out customers with credit cards is much faster and easier for me. I find being a cashless establishment safer and more convenient.

**Cardtronics' Testimony on Cashless Ban Bill Submitted to the  
New York City Council Committee on Consumer Affairs and Business Licensing**

**February 14, 2019**

My name is Brian Bailey; I am Executive Vice President and Managing Director of North America Business Group for Cardtronics. Thank you Councilmembers Ritchie Torres (Bronx, 15th District), Chaim Deutsch (Brooklyn, 48th District), Rafael Espinal (Brooklyn, 37th District), and Keith Powers (Manhattan, 4th District), for introducing bill No. 1281 to amend the administrative code of the city of New York to prohibit food-service or retail establishments from refusing to accept payment in cash from consumers.

With the rise in the number of merchants and retailers nationwide implementing cashless-only payment acceptance policies, Cardtronics is pleased to see that New York City lawmakers recognize the negative impact of 'no-cash' restrictions on consumers. Some seniors, people with disabilities, teenagers, or the unbanked/underbanked population may have no other form of payment but cash in their wallets, and should not be prevented from buying basic necessities.

Cardtronics is the largest operator of ATMs in the world, connecting people to cash in 10 countries, across four continents in North America, Europe, Africa and Australia. Through our partnerships with financial institutions and retailers globally, Cardtronics operates nearly 230,000 ATMs around the world, including more than 100,000 ATMs in the U.S.

Our Allpoint network is the largest free-to-use ATM network in the U.S. With over 40,000 ATMs nationwide, located in top retail locations such as Target, CVS, and Walgreens, the Allpoint network allows financial institutions like Citi, Capital One, USAA, and countless community banks and credit unions--to provide their customers with convenient, surcharge-free access to ATMs where they live and work. In the New York City metro area, Cardtronics operates 3,754 ATMs.

We strive to be *Champions of Cash* in every community that we serve, ensuring that people have access to cash when and where they need it. Prior to natural disasters, Cardtronics can mobilize to fully stock our ATMs, so that people have 24/7 access to cash for emergency preparations. During hurricanes Maria and Harvey, most of our ATMs were operational, even when other infrastructure was down.

Those promoting cashless policies disregard how much cash means to individuals, and how much they rely on cash for their daily needs. In 2018, Cardtronics launched a campaign called 'Cash Is . . .' campaign ([www.whatiscash.com](http://www.whatiscash.com)), designed to advance the public dialogue about why cash is important to our lives and economy. Through videos we produced and posted to social media, we highlighted what cash means to different people: cash is money under the pillow from the tooth fairy for a child; cash is paying fresh food at the farmers' market; and cash is learning financial responsibility.

One of the three winners, a stay-at-home mom, produced an engaging rap video, demonstrating how cash gives her freedom to do more things for herself and her son.

As *Champions of Cash*, we support consumer payment choice and believe that merchants should treat all forms of payment -- from digital to cash – equally, particularly since cash remains the most popular form of payment among Americans. In 2017, consumers used cash 30.3% of the time, debit cards 26.2%, and credit cards 21%, as reported by the Federal Reserve Consumer Payment Choice Survey.<sup>1</sup>

When merchants mandate cashless payment policies, they are preventing cash customers from participating in commerce, effectively dividing consumers into the *haves* and the *have-nots*. These policies are particularly harmful to lower income and unbanked and underbanked New Yorkers, who rely more on cash for their daily purchases and payments.

The 2015 Urban Institute study found that about 360,000 households (11.7%) were unbanked and another 780,000 New York City households (25.1%) were underbanked.<sup>2</sup> More New York City residents are unbanked and underbanked, compared to the national average of unbanked and underbanked households. Nationwide, the *FDIC 2017 Survey of Unbanked and Underbanked* found more than 14 million adults (6.5%) are unbanked and nearly 49 million (18.7%) are underbanked.<sup>3</sup>

A recent Pew Research Cash study concluded that lower-income Americans are about four times as likely as higher-income Americans to say they make all or almost all of their purchases using cash. And that Blacks are more likely than whites or Hispanics to rely on cash: 34% use cash for all or almost all of their purchases, compared with 15% of whites and 17% of Hispanics.<sup>4</sup>

It's evident that some people use cash by choice, others by necessity; but they shouldn't have their purchasing options limited by business refusing to take their hard-earned money. No matter who you are--your race, age, gender, or income—you can use cash because it doesn't discriminate and has universal acceptance.

Cash teaches young people—the basics of spending, saving, and budgeting. *The Wall Street Journal* recently published a story about how the cashless movement is making it challenging for parents to teach their children financial literacy.<sup>5</sup>

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<sup>1</sup> <https://www.frbatlanta.org/-/media/documents/banking/consumer-payments/research-data-reports/2018/the-2017-diary-of-consumer-payment-choice/rdr1805.pdf>

<sup>2</sup> <https://www.urban.org/research/publication/where-are-unbanked-and-underbanked-new-york-city>

<sup>3</sup> <https://www.fdic.gov/householdsurvey/2017/2017execsumm.pdf>

<sup>4</sup> <http://www.pewresearch.org/fact-tank/2018/12/12/more-americans-are-making-no-weekly-purchases-with-cash/>

<sup>5</sup> <https://www.wsj.com/articles/the-first-money-lesson-to-teach-your-children-this-is-what-a-dollar-looks-like-11549657256?mod=searchresults&page=1&pos=1>



Cash is also the durable foundation of our economy and national security. We need look no further than Sweden to see the risks that emerge when a nation turns its back on cash. Only 2% of transactions in Sweden are made with cash. Most banks have no cash on hand and won't allow people to bring cash into their branches. Yet, a recent public opinion poll found 7 out of 10 Swedes still want the option to use cash.

A parliamentary committee is studying the impact that declining cash use will have on the country, particularly in the event of a hacking or power failure. In 2018, the Swedish government issued a disaster and emergency preparedness brochure to citizens, advising Swedes to put some cash aside in case of a national crisis or war.<sup>6</sup>

Becoming a cashless society threatens a country's economy, national security, and the freedom of its citizens. America cannot become Sweden.

For these reasons and more, cash should be included in, not be excluded from, the many payment options that Americans have at retail establishments in New York City.

We have an emotional and historical connection to our currency that transcends nations. Nothing excites, inspires, or satisfies us like holding paper bills or coins in our hands. "This note is legal tender for all debts, public and private" is printed on every U.S. paper denomination. As the foundation of our nation, shouldn't cash be accepted everywhere?

New York City's proposed cashless-ban bill is good, common-sense policy that acknowledges the vital role this form of currency plays in our growing digital economy. We look forward to the City Council passing this very important bill that protects consumer payment choice.

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**Contact:**  
Crystal Wright  
Cardtronics, Government and Community Relations  
202-549-8072  
cwright@cardtronics.com

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<sup>6</sup> <https://www.npr.org/2019/02/11/691334123/swedens-cashless-experiment-is-it-too-much-too-fast>

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1281 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 02/14/19

(PLEASE PRINT)

Name: JULEON ROBINSON

Address: 121 W. 27th St Suite #8021 NY, NY 10001

I represent: New Economy Project

Address: 121 W. 27th St Suite # 8021 NY, NY 10001

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1281 Res. No. 2018

in favor  in opposition

Date: 2/14/19

(PLEASE PRINT)

Name: Michelle Gauthier

Address: 77 Warren St #1

I represent: Mulberry & Vine

Address: 73 Warren St

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1281 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 02/14/19

(PLEASE PRINT)

Name: Andy Collado

Address: 102-37 46th Ave, Corona, NY 11368

I represent: The Financial Clinic

Address: 254 36th St, Suite B321, Brooklyn, NY 11232

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

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1281 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 02/14/2019

(PLEASE PRINT)

Name: ANNAMARIA FERENCZ

Address: 3601 31 AVE, ASTORIA, NY 11106

I represent: BY CHLOE

Address: 950 THIRD AVE, NY, NY 10022

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1281 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 2/14/19

(PLEASE PRINT)

Name: Jillian Grossberg

Address: 301 W 108th St apt 2E

I represent: BY CHLOE

Address: 950 3rd Ave

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1027/1281 Res. No. #2

in favor  in opposition

Date: 2/14/19

(PLEASE PRINT)

Name: KENNY Minsky

Address: \_\_\_\_\_

I represent: NYC Consumer Affairs

Address: \_\_\_\_\_

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Casey Adams, Director of City Legislative Affairs

Address: \_\_\_\_\_

I represent: N.Y. Dept. of Consumer Affairs

Address: 30 Broadway

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

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THE CITY OF NEW YORK**

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I intend to appear and speak on Int. No. 1281 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Leo Kremer

Address: 355 E 19th St #5 NY NY 10003

I represent: Dr. Toros Teague

Address: 32 West 22nd St #2 NY NY 10010

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THE CITY OF NEW YORK**

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in favor     in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Edgard LABORDE

Address: \_\_\_\_\_

I represent: RWDSU

Address: \_\_\_\_\_

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**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor     in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: ZEV JOUAMAN

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

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