



Commission On Human Rights

New York City Commission on Human Rights

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Testimony of JoAnn Kamuf Ward Deputy Commissioner of Policy and External Affairs New York City Commission on Human Rights Before the Committee on Civil and Human Rights October 3, 2025

Introduction

Good afternoon Chair Williams and Committee members. I am JoAnn Kamuf Ward, Deputy Commissioner of Policy and External Affairs at the New York City Commission on Human Rights (“CCHR” or “the Commission”). Joining me today for questions is Kevin Farley, Associate Commissioner of Investigations and Operations of the Commission’s Law Enforcement Bureau. Thank you for convening today’s hearing. We are excited to speak about the agency’s work combatting discrimination in housing.

The NYC Commission on Human Rights is dedicated to ensuring all New Yorkers are able to live, work, and thrive in our city, free from discrimination. The Commission welcomes the opportunity to speak about the NYC Human Rights Law’s protections against housing discrimination and the ways that the Commission on Human Rights educates New Yorkers about their rights and obligations under the Law. In recent years, the Commission has strengthened this work and developed new initiatives to address housing discrimination.

The New York City Human Rights Law

The New York City Human Rights Law (the “Law”) is one of the most robust civil rights laws in the country. The Law prohibits discrimination in three main areas – housing, employment, and places of public accommodation. More than twenty-seven protected categories are explicitly recognized in the New York City Human Rights Law, including disability, race, sexual orientation, and gender identity. In housing, the Law also prohibits discrimination based on source of income, criminal history, and the presence of children. In addition, it is illegal for covered entities – such as housing providers – to retaliate against individuals for asserting their rights.

Agency Mandate and Structure

To fulfill the Commission’s dual mandate of enforcing the New York City Human Rights Law and fostering intergroup relations, the Commission’s two largest units are the Community Relations and Law Enforcement Bureaus.

The Community Relations Bureau sits at the center of CCHR’s education efforts, and is responsible for outreach and training. Community Relations staff work in partnership with housing providers, non-profits, houses of worship, businesses, and sibling agencies to ensure New Yorkers know about the Law’s protections. Commission staff lead public events, host roundtables, organize days of visibility,

participate in resource fairs, and deliver trainings focused on the Law, cultural competency, and bystander intervention. This engagement is fundamental to challenging bias and discrimination.

The Law Enforcement Bureau combats discrimination with a wide range of tools, including launching investigations, performing tests, conducting pre-complaint interventions, responding to public inquiries, and filing complaints to address individual and structural discrimination.

Protections against Discrimination in Housing

The New York City Human Rights Law aims to protect against invidious discrimination that impacts housing applicants, tenants, and residents. The New York City Human Rights Law defines a “housing provider” as any and all individuals with the authority to approve or deny the rental or sale of housing, including brokers, licensed salespeople, building owners, property managers, as well as their agents and their employees. Under the Law, it is illegal for housing providers to refuse to sell or rent housing, or to misrepresent the availability of housing, based on a person’s protected category. It is also illegal for housing providers to set different terms or conditions for sale or rent based on a person’s protected category. Statements or advertisements that directly or indirectly express limitations based on a protected category also violate the Law.

Today we will highlight work that demonstrates how the Commission has been advancing disability protections, source of income protections, as well as the newest housing provision – known as Fair Chance in Housing – which bans discrimination based on criminal history.

1. Disability Protections

The New York City Human Rights Law has expansive protections for persons with disabilities, requiring housing providers to ensure that individuals with a disability have an equal opportunity to apply for, use, and enjoy a dwelling. To meet this obligation, housing providers must engage in a cooperative dialogue and, in the absence of an undue hardship, provide reasonable accommodations that meet the needs of individuals with disabilities. Accommodations may involve a structural change to the physical space like building a ramp, or an adjustment to a policy or practice, such as allowing an emotional support animal.

2. Source of Income Protections

The New York City Human Rights Law prohibits discrimination based on a person’s source of income, requiring nearly all landlords and real estate brokers to accept any lawful source of income from an applicant such as Section 8, FHEPS, and emergency housing vouchers, which are issued by HRA, HPD and other agencies. Because of these protections, it is illegal in New York City to disqualify applicants or otherwise discourage people from viewing units because they pay with a housing voucher, or otherwise treat those applying for an apartment less well because they pay with a voucher.

3. Fair Chance in Housing Protections

As of January 1, 2025, the Fair Chance Housing Law makes it illegal for most housing providers to discriminate against renters and buyers because of criminal history, aiming to overcome longstanding barriers to housing stability. The new law allows housing providers to conduct criminal background

checks on prospective tenants *only* after reviewing other factors such as ability to pay rent and tenant history, and making a conditional offer of housing. Housing providers that choose to do a criminal background check are now required to follow a series of steps that ensure tenant qualifications are the focus of decision-making in order to prevent arbitrary denials of housing based on a criminal record alone. A conditional offer can only be revoked in narrow circumstances after an individualized assessment of an applicant, among other requirements.

The Commission effectuates these protections in several ways, consistent with our dual mandate.

Education and Outreach

Through education and outreach, the Commission works to make sure New Yorkers understand their rights and obligations under the New York City Human Rights Law. In FY 25, the Commission achieved a new milestone, engaging with one hundred and fifty thousand and fifty three (150,053) New Yorkers.

One consistent pathway of engagement is trainings. The Commission offers a series of trainings covering the anti-discrimination protections under our jurisdiction, including Human Rights Law 101, an overview of housing discrimination, and a training focused on disability protections in housing. This year, we were proud to present our disability training to the Disability Service Facilitators citywide in partnership with the Mayor's Office for Persons with Disabilities. All trainings are available to the public upon request.

The Commission also works diligently to meet New Yorkers where they are throughout the five boroughs. As one example, the Commission provided housing trainings at older adult centers. The agency also has deep collaborations in the disability community. In FY 25, CCHR co-hosted the Disability Unite Festival with community partners as a day of activity and learning, reaching more than five thousand (5,000) people. Another example is participation in the Andrew Heiskell Braille and Talking Book Library's resource fair. The agency also partnered with the Bronx Borough President's Disability Advisory Council, and Centers for Independent Living on outreach.

In FY 25, the Commission also continued to raise awareness of source of income protections, the Fair Chance Housing Act, and other tenant rights. CCHR collaborated with CAMBA, Asian Americans for Equality, Harlem Development Corporation, and Northfield Economic Development Corp, among others, to provide workshops and seminars, and participate in resource fairs. In collaboration with the Department of Housing Preservation and Development (HPD), the Commission joined "Where We Live" outreach events, engaging landlords and agents on their obligations under the New York City Human Rights Law. FY 25 also saw the second year of the CCHR partnership with the Fordham Real Estate Institute, which features a free course for brokers and realtors who earn professional credit while they learn about the City Human Rights Law.

The Commission is deeply committed to promoting the protections in the new Fair Chance Housing Law, and this year we are partnering with a Public-Artist-in-Residence as part of holistic outreach and education efforts. The artist is producing a play that depicts scenarios of discrimination that can occur when seeking housing and educates participants on the New York City Human Rights Law. Additionally, we launched a citywide multilingual campaign "Break Down Barriers to Housing" to ensure that housing providers and residents are aware of their rights under the new Fair Chance to Housing Law. The campaign appeared in print, on digital platforms, on LinkNYC kiosks as well as in

convenience stores to garner more than 19 million impressions and generate over 10,000 visits to the Commission's website and social media pages. This campaign built on the Commission's 2023 citywide "Vouchers Pay. Discrimination Doesn't." campaign, which included large scale bus shelter posters and featured Commissioner Palma in a public service announcement for TaxiTV, as well as ads in multiple languages with community and ethnic media outlets.

Accountability Through Enforcement Tools

The Commission's Law Enforcement Bureau uses a wide range of enforcement tools to address instances of discrimination, from testing to Pre-Complaint Interventions (PCIs), to case settlements. Pre-Complaint Interventions are utilized in particular in the housing context to address discrimination with an expedited resolution.

In FY 25, the Law Enforcement Bureau fielded over fifteen thousand and five hundred (15,507) inquiries from members of the public, which includes one thousand two hundred and twenty-two (1,222) jurisdictional inquiries related to housing. This is consistent with the upward trend over the past four fiscal years. The vast majority of the over three hundred (300) Pre-Complaint Interventions undertaken by the Law Enforcement Bureau were also in the area of housing. Pre-Complaint Interventions are also a tool to secure housing opportunities, such as an apartment viewing for an individual paying with a voucher who may have been ghosted. The Commission's PCIs can also allow for reasonable accommodations to be implemented for a tenant with disabilities without a complaint being filed where the parties are willing.

Of the more than six hundred (600) claims filed in FY 25, one hundred and seventy (170) were in the area of housing. Filed claims are often resolved through settlements, allowing the Commission to pursue monetary awards, civil penalties, and other creative forms of affirmative relief for those impacted by discrimination. Affirmative relief can include policy and practice changes, set asides and broker incentives, as well as relevant trainings. The Commission is proud to have effectively utilized affirmative relief in source of income cases to increase housing availability for voucher holders. Last year, in partnership with the Fair Housing Justice Center, the Commission settled its largest housing case ever, resulting in 850 apartments set aside for voucher holders and \$1 million in civil penalties. Even smaller cases have led to expanded housing opportunities, such as an FY 25 case that resulted in ten set aside units for voucher holders, as well as damages and civil penalties.

These examples represent some of the ways that the Commission uses education and outreach, as well as enforcement tools to combat discrimination in housing for New Yorkers.

Conclusion

In closing, the Commission works with dedication to address discriminatory policies and practices that stand in the way of housing access through our dual mandate of enforcement and education and outreach. We appreciate the Council's time and attention and welcome your questions.



**JUMAANE D.
WILLIAMS**

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON
CIVIL AND HUMAN RIGHTS
OCTOBER 3, 2025**

Good Morning.

My name is Jumaane D. Williams and I am the Public Advocate for the City of New York. I want to thank Chair Williams and members of the Committee on Civil and Human Rights for holding this hearing and allowing me the opportunity to provide a statement.

There is a long and painful history of housing discrimination and inequity in this country and our city has seen its fair share of such injustices. The Fair Housing Act, enacted in 1968, is a critical piece of legislation prohibiting discrimination against renters or homebuyers on the basis of national origin, race, religion, sex, or disability.¹ Building on that framework, the New York City Council last year passed the “Fair Chance for Housing” Act ([Local Law 24](#) of 2024), prohibiting discrimination on the basis of criminal history. Yet despite these protections, Local Law 24 having gone into effect earlier this year, discrimination continues. Renters with Section 8 vouchers, for example, are routinely denied with bad actors finding new ways to scam and steer voucher holders away from coveted neighborhoods.²

Similarly, the process to sell or purchase a cooperative apartment is often mired in obscurity by the Board of Directors with very little transparency afforded to prospective sellers and buyers. This asymmetry in information denies potential buyers a critical understanding of the rationale for denials. [Intro 407](#), introduced by my office, aims to bring more accountability and transparency to these processes where discrimination often goes overlooked. This bill would require co-ops to provide prospective buyers with a written statement detailing reasons for denial within five days of the decision.

Finally, the issue of deed theft cannot be overlooked. During the height of the pandemic, my office received many requests for legal assistance from constituents facing deed theft schemes. In a 2020 report, the New York State Office of the Attorney General found that between 2014 and 2019, New York City received around 3,000 complaints regarding Deed Theft.³ Of those 3,000

¹ https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview

² <https://www.cssny.org/news/entry/corporate-landlords-are-finding-new-ways-to-discriminate-against-voucher-h>

³ <https://ag.ny.gov/press-release/2020/attorney-general-james-launches-protect-our-homes-initiative-combat-deed-theft>



**JUMAANE D.
WILLIAMS**

complaints, 45% of them came from Brooklyn. While anti-deed theft legislation (S.6577/A.6656), signed into law in 2023, empowered prosecutors in challenging fraudulent real estate transactions, the fact remains that black and brown homeowners are disproportionately impacted by these schemes.⁴ The passage of Local Law 26 earlier this year is a welcome and necessary change, providing homeowners and their heirs with counseling and support via the Office of Financial Empowerment and the Office of the Homeowner Advocate.⁵ Similarly, Local Law 25 provides an affirmative defense for credible buyers and a check on fraudulent actors by requiring market value disclosure of residential properties.⁶ I look forward to hearing from the administration how these measures have been implemented, whether they've been an effective safeguard against deed theft and of course, how they have supported and protected New York City's homeownership communities.

Thank you.

⁴ <https://www.governor.ny.gov/news/governor-hochul-signs-legislation-protect-new-york-homeowners-deed-theft>

⁵ <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6695284&GUID=9E226DE0-E6E7-4369-BBAB-1DD934C4923D&Options=&Search=>

⁶ <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6695260&GUID=921A3F88-D7AB-4C36-9397-B136562F732D>



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BROOKLYN DEFENDER SERVICES

Presented before

**The New York City Council
Committee on Civil and Human Rights**

Housing Discrimination and Inequality

October 3, 2025

My name is Alexandra Dougherty, and I am a Supervising Attorney in the Civil Justice Practice at Brooklyn Defender Services. I want to thank the Committee on Civil and Human Rights and Chair Williams for inviting us to testify about housing discrimination experienced by New Yorkers. Adequate enforcement of our robust anti-discrimination laws is necessary to protect the right to affordable housing for all New Yorkers.

BDS is a public defense office whose mission is to provide outstanding representation and advocacy free of cost to people facing loss of freedom, family separation and other serious legal harms by the government. For 29 years, BDS has worked, in and out of court, to protect and uphold the rights of individuals and to change laws and systems that perpetuate injustice and inequality. BDS represents thousands of people each year who are accused of a crime, facing the removal of their children to the foster system, or challenging deportation. Our staff consists of specialized attorneys, social workers, investigators, paralegals, and administrative staff who are experts in their individual fields. BDS also provides a wide range of additional services for our clients, including civil legal advocacy, assistance with educational needs of our clients or their children, housing, and benefits advocacy, as well as immigration advice and representation.

BDS' Civil Justice Practice aims to reduce the civil collateral consequences for the people we serve who are involved with the criminal, family, or immigration legal systems. Our practice combats housing instability in a variety of ways: we defend people from eviction in housing court, provide proactive relocation assistance and benefits advocacy, and help clients navigate the shelter system. Through this work we see the profound challenges New Yorkers face in securing safe, affordable, and permanent housing.



Source of Income Discrimination

BDS works with New Yorkers who are experiencing housing insecurity or are unhoused and works to help them find secure and stable housing. The most pervasive obstacle our clients face is source-of-income discrimination. The majority of people we work with in this capacity are voucher holders. The housing search process typically starts with a voucher holder reaching out to brokers via rental listing websites and private brokerage firms. Brokers then request a credit score and proof of income at least 40 times the monthly rent. In our experience, prospective tenants who respond with proof of their voucher rarely receive a response from the broker or they are told explicitly that the landlord does not accept vouchers. Despite New York City's protections against source-of-income discrimination, landlords and brokers know that enforcement is weak, and they are unlikely to be held accountable for denying housing to voucher holders. Due to this unchecked source-of-income discrimination, the people we serve regularly spend six months or longer attempting to secure housing with their vouchers, unnecessarily prolonging homelessness and housing instability.

One BDS client, Ms. C, recently called a broker during her housing search. The broker immediately inquired about her income, to which she accurately responded that she had a voucher and thus her income was not relevant. The broker stated that they do not currently accept clients with vouchers at the moment, incorrectly insisted that the rent exceeded the voucher limit, and refused to engage in further conversation. Ms. C reached out to her BDS Affordable Housing Specialist, who tried calling the broker back with Ms. C to help advocate. Even with a legal advocate on the phone, the broker continued to insist that they would not work with Ms. C. Although we advised Ms. C about her options for challenging this discrimination directly, she, like many of our clients, wanted to focus on her immediate housing search. BDS does engage directly with the Commission on Human Rights and files discrimination complaints, but for many of the people we serve their goal is to find housing and prioritize their apartment search.

Vouchers such as CityFHEPS and Section 8 are described by the city as the ticket to finding safe, affordable, and permanent housing. But vouchers themselves are meaningless if the agencies tasked with limiting discrimination by landlords and brokers are unable, due to lack of resources, to provide meaningful enforcement of these protections. Without this enforcement, our anti-discrimination laws are merely cosmetic, and our clients are unable to search for housing in any meaningful way. The Commission on Human Rights must be fully funded to enable voucher-holders to secure stable housing.

Improvements to the CityFHEPS Application and Approval Process

There are several immediate fixes to the CityFHEPS program that can help combat source-of-income discrimination and expand the pool of apartments available to voucher holders. First, FHEPS, CityFHEPS for shelter, and CityFHEPS in the community all provide different incentives, which leads to confusion and jeopardizes the process of securing an apartment. Fees and unit-hold incentives should be consistent across all vouchers. The Council must do



everything in its power to make the CityFHEPS processes as consistent and straightforward as possible.

Next, while source of income discrimination is often rooted in racism, classism, and bias, many landlords and brokers also have legitimate concerns with the CityFHEPS program that can be addressed by the administration. For the CityFHEPS program to function, it is essential that landlords can trust the application process to run smoothly and that payments will be issued timely and in full. As it stands, the approval process is extremely slow and onerous. Once tenants have endured the months-long wait for a voucher, overcome source-of-income discrimination, and found a landlord willing to work with them, they often wait up to three months for final approval and check issuance before they are able to move into their apartments. For people who are at risk of homelessness and receive CityFHEPS via Homebase, by the time a voucher is issued and an apartment is found, clients must reconnect with Homebase and are often required to re-do the intake process and be reassigned a caseworker. It is vital that Homebase prioritizes clients who have secured apartments. It should take days not weeks for Homebase to connect with brokers and landlords to begin the approval process, or clients will continue to lose out on housing opportunities.

Landlords know that the CityFHEPS program is riddled with errors, delays, and an overall lack of clear communication. For tenants without advocates to troubleshoot these issues for them, this can become an insurmountable obstacle. HRA has an obligation to streamline the approval process by eliminating unnecessary steps, reducing errors, and facilitating clear communication with all parties.

Discrimination Based on Criminal Background

For many of our clients experiencing housing or employment insecurity, options are even further limited by an arrest or conviction history. Because of long-standing racial inequities in our criminal legal system, Black and brown people have been disproportionately impacted by housing discrimination on the basis of an arrest or conviction record. By shutting people out of both the city's limited affordable housing stock and the competitive job market, discriminatory background checks prevent people from stabilizing their lives and perpetuate cycles of homelessness.

The Council's passage of Fair Chance for Housing was an important milestone to combat housing discrimination against New Yorkers with conviction and arrest histories. This is crucial because access to housing lowers recidivism, allows people to support themselves and their families, and makes our city safer. We know that access to housing is the foundation of thriving communities. However, as with all of our robust anti-discrimination laws, these laws are only as strong as our ability to enforce them and to educate the public on its rights and responsibilities.



The City Must Invest in Preventive Outreach and Education

The City Commission on Human Rights, which is tasked with enforcing and educating the public about the city’s anti-discrimination laws, has been systemically underfunded. It is both underfunded and understaffed compared to similar agencies in smaller cities.¹ We have seen how the current Fiscal Year 2025 budget of \$14.1 million has been drastically insufficient to enforce these laws and prosecute claims of discrimination,² let alone to engage in vital preventative and educational outreach.

The Commission’s staff has consistently decreased, leading to ballooning workloads and delays in hearing complaints. Our understanding is that a significant backlog of complaints began at the beginning of the COVID-19 pandemic when many staff members left and persists due to persistent staff shortages. Although the Commission is supposed to conduct an investigation once a complaint is filed and answered, the case backlog results in significant delays.

We have felt the CCHR’s diminished capacity in our practice. BDS has complaints that have been pending at the CCHR for years, with little to no progress made. We believe that many of the cases we bring would benefit from CCHR’s mediation process. Early resolution via mediation—where appropriate—would be an efficient use of funding because it would allow CCHR to resolve complaints without the need for a full investigation or litigation. We therefore urge the Commission to contribute funding that would expand CCHR’s mediation program.

It is critical that CCHR receive full funding across the entire agency. Full funding must also ensure that the Commission has resources to conduct comprehensive and ongoing community outreach and education about our anti-discrimination laws. CCHR is charged with preventing discrimination by informing the public of their rights and responsibilities under our laws but is not equipped with the resources to do so. Therefore, responsibility for public education and outreach about the new Fair Chance for Housing law has fallen predominantly on advocates and coalition members, including BDS, but our organizations are not in a position to reach private housing providers. Until the Commission is adequately funded, housing providers will continue to conduct discriminatory background checks and violate the law simply because they are unaware of it.

The Commission continues to make laudable efforts to combat discrimination in New York City but cannot be expected to meet its mandate without a meaningful increase in funding. The council passed the city’s Human Rights Law to provide broad and comprehensive protections for vulnerable populations, but it can only do so if the Commission is given the resources to enforce those protections. With the addition of the newly effective Fair Chance for Housing law, the Commission’s need for those resources is greater now more than ever.

¹ The Seattle Office of Civil Rights has a budget of \$7,863,947 in 2025 and serves a city of about 755,000.

² Adjusted for inflation, CCHR’s FY25 budget was lower even than its pre-pandemic 2019 budget.



Conclusion

BDS is grateful to New York City Council's Civil and Human Rights Committee for your time and consideration of our comments. We look forward to further discussing these and other issues that impact the people and communities we serve. If you have any additional questions, please contact Alexandra Dougherty, Supervising Attorney, at adougherty@bds.org.



**Housing Works Testimony Before the
New York City Council Committee on Civil and Human Rights
Oversight Hearing - Housing Discrimination and Inequity**

October 3, 2025

**Ending Source of Income Housing Discrimination Against People Living with HIV and Others
Who Rely on Publicly Funded Rental Assistance**

Anthony Feliciano, Vice President of Community Mobilizations

My name is Anthony Feliciano, and I am the Vice President of Community Mobilization for Housing Works. I would like to thank you, Chair of the New York City Council's Committee on Civil and Human Rights, Dr. Nantasha Williams, for the opportunity to provide testimony on behalf of our organization. I am here to urge this Council to take decisive action against housing discrimination targeting people living with HIV and other New Yorkers who rely on rental assistance programs and other lawful sources of income, such as public assistance, disability benefits, housing vouchers, and subsidies meant for HASA.

Housing Works is a healing community founded in 1990 with a mission to end the dual crises of homelessness and AIDS. We currently provide a range of integrated medical, behavioral health, housing, and support services for over 15,000 low-income New Yorkers annually, with a focus on the most marginalized and underserved—those facing the challenges of homelessness, HIV, mental health issues, substance use disorder, other chronic conditions, and incarceration, and, most recently, migrants displaced from their homes due to violence or other crises who seek safety and a better life in the United States.

At Housing Works, we believe as a core value that housing is healthcare and a basic human right. Our mission is to provide safe, secure, and stable housing to New Yorkers experiencing homelessness, employing a low-threshold, harm reduction approach that respects the dignity of every person. At Housing Works, we have witnessed firsthand both the powerful impact of safe, stable housing and the barriers posed by the underfunding and understaffing that cripples our City's response to the affordable housing and homelessness crises.

Housing Is Health Care

Housing Works is also a founding member of the End AIDS NY Community Coalition (EtE Community Coalition), a group of over ninety healthcare centers, hospitals, and community-

based organizations that are fully committed to ending AIDS as an epidemic in all New York communities and populations. New York City and State have made considerable progress implementing the historic 2015 Ending the Epidemic (EtE) Blueprint recommendations developed collaboratively by HIV community members, providers, advocates, and public health authorities. Our EtE efforts enabled us to “bend the curve” of the epidemic by the end of 2019, decreasing HIV prevalence for the first time since the epidemic began, and the most recent HIV surveillance data show that this trend continues. However, the data also shows that while HIV health outcomes have improved across all communities, stark and unacceptable disparities persist in HIV’s impact on Black and Hispanic/Latino New Yorkers (who accounted for 84% of persons newly diagnosed in NYC in 2023), transgender New Yorkers, and young men who have sex with men.

Ample evidence shows that safe, permanent, accessible, affordable housing is essential to benefit from highly effective HIV treatment that suppresses viral loads to undetectable levels, sustaining optimal health and stopping the spread of HIV. Indeed, New York State’s historic Blueprint for Ending the Epidemic identifies housing as HIV healthcare and includes specific recommendations to ensure access to housing as a critical enabler of HIV care.

For people living with HIV, stable housing is not a luxury, it is a lifeline. Homelessness and housing instability independently predict poor retention in HIV care, failure to achieve viral suppression, poor health outcomes including increased rates of premature mortality, and ongoing HIV transmission. Likewise, repeated studies show that access to safe, stable housing improves health, reduces avoidable acute care spending, and prevents new infections. Yet many New Yorkers living with HIV face systemic discrimination when seeking housing. This is not just about stigma—it is about survival and healthy aging.

Rachel Settlege’s research shows that people living with HIV are routinely denied housing or steered away from desirable neighborhoods—even when they qualify for meaningful rental assistance programs like the HASA (HIV/AIDS Services Administration) permanent shelter allowance. Discrimination is compounded by race and poverty, disproportionately affecting Black and Latine New Yorkers living with HIV (Settlege, 2022).

Source of Income Discrimination: A Civil Rights Crisis

Source of income (SOI) discrimination against those who rely on publicly funded rental assistance is rampant in New York City. Although such discrimination has been illegal since 2008, landlords and brokers continue to deny housing to voucher holders through tactics such as ghosting, false claims of unavailability, minimum-income and credit requirements, and outright refusal. Unlock NYC has documented over 2,200 reports of SOI discrimination since 2018, with

incidents reported in every single City Council district. Nearly 50% of these cases involve landlords simply ignoring applicants once they mention a voucher (Unlock NYC, 2023).

The NYC Commission on Human Rights has filed 176 cases of SOI discrimination since 2018 and recovered over \$780,000 in damages for victims. But most cases go unreported, and enforcement remains weak.

Housing Works' Legal Department offers clients advice and representation on matters involving housing, public benefits, consumer issues, gender, disability, and housing discrimination, and more. Armen H. Merjian, our Senior Staff Attorney, has successfully filed numerous cases challenging source of income discrimination on behalf of households living with HIV and/or receiving rental subsidies, including the first ever trial on source of income discrimination in *Short v. Manhattan Apts., Inc.* 916 F. Supp. 2d 375 (S.D.N.Y. 2012). Our legal department and social workers have exposed how landlords now use more subtle tactics—such as imposing minimum-income and credit score requirements that are irrelevant for applicants whose rent is fully covered by a voucher. These practices are discriminatory in effect, and arguably illegal on their face (Merjian, 2023).

Source of income discrimination is pervasive as well among others eligible for government-funded rental assistance, such as formerly homeless persons seeking to take advantage of CityFHEPS vouchers and Section 8 Housing Choice vouchers.

In *Olivierre v. Parkchester Preservation, L.P.*, Mr. Merjian and co-counsel Diane Houk of Emery Celli, with support from the City, secured a landmark victory in establishing for the first time that it is illegal under New York's SOI laws to impose minimum-income requirements on those with full housing vouchers. Counsel secured an injunction requiring Parkchester—when constructed, the largest private housing complex in the world—to process Ms. Olivierre's application utilizing a CityFHEPS voucher, regardless of her income, allowing a single mother of two young children the opportunity to end her homelessness and secure stable housing. *Olivierre v. Parkchester Pres. Co., LP*, 452058/2022, 2022 NYLJ LEXIS 1247 (Sup. Ct. N.Y. Cnty. Aug. 12, 2022). This eventually led to Parkchester opening up their thousands of units to tenants with subsidies and vouchers who were previously being denied access based on exclusionary practices.

Source of income discrimination disproportionately impacts:

- Over 576,000 low-income families in New York State who rely on federal rental assistance
- More than 227,000 families holding Housing Choice Vouchers (HCVs)
- Individuals and families living with HIV who rely on HASA housing subsidies

- Black and Latine New Yorkers, who are overrepresented among voucher holders due to systemic inequities, as well as persons marginalized by sexual orientation or gender identity
- Individuals with disabilities, seniors, and survivors of domestic violence.

The more subtle “second-generation” discrimination tactics described above frustrate the very purpose of laws prohibiting SOI discrimination and perpetuate racial and economic segregation. They disproportionately harm people living with HIV, who are more likely to be low-income, disabled, and reliant on public assistance.

1 in 10 voucher holders is likely to be denied housing due to credit score or income-related screening criteria — even though their rent is largely or fully guaranteed by the voucher/subsidy. Landlords often use minimum credit score thresholds and rent-to-income ratios that don’t reflect the reality of subsidized renters, effectively excluding them from housing opportunities.

Voucher holders have guaranteed rent payments through public subsidies, making credit history less relevant to their ability to pay rent. Yet, landlords and tenant screening services still apply standard credit criteria, which disproportionately penalize low-income renters and people of color.

Repeated denials based on credit scores can cause stress, shame, and discouragement, especially for those already navigating complex health or social challenges. They reinforce economic and racial disparities, pushing vulnerable populations into segregated or lower-opportunity neighborhoods.

The continued use of credit scores in housing decisions for voucher holders and people living with HIV undermines public health goals, violates the spirit of anti-discrimination laws, and perpetuates cycles of poverty and instability

Recently introduced NYC Council bill Int. 1214-2025 does not mandate a ban on the use of credit scores for voucher holders. Instead, the bill focuses on requiring the online property owner registry to include information about SOI discrimination, including penalties imposed on landlords who violate existing laws. The law ensures fair access to housing for people relying on government assistance and holds landlords accountable for discriminatory screening practices.

What’s still missing is that there is no comprehensive city or state legislation that fully bans the use of minimum-income or credit scores across all housing types for voucher holders. The current policies on credit scores apply mainly to affordable housing programs and state-funded housing. But they do not cover private market rentals, where landlords may still use credit scores to screen applicants.

The intersection of HIV stigma, homelessness, and racism presents a compounded crisis. Homelessness increases exposure to violence, poor nutrition, and lack of medical and behavioral health care—all of which contribute to worse HIV outcomes and declining overall health. Black and Latine communities, already disproportionately affected by HIV due to poverty, structural racism in health care, and unstable housing, face the greatest barriers when trying to secure stable housing. When landlords reject voucher holders, they are turning away fellow New Yorkers who are trying to manage a complex condition in order to live and thrive.

Housing Works urges the Council to:

- Introduce and pass legislation or expand on existing regulations to ban minimum-income requirements. All such legislation proposed here should be formulated in consultation with the experts in the field, including Mr. Merjian, Ms. Houk, and others.
- Strengthen SOI protections by increasing penalties for violators; Housing Works can provide specific suggestions in this area
- Support (Int. 1214-2025)
- Develop a citywide legislative ban on the use of minimum -income and credit scores to screen voucher holders. Expand the protections to all housing types, not just subsidized units and create enforcement mechanisms to hold landlords accountable.
- Hold landlords accountable for discriminatory screening practices. This should include restoring or increasing the number of attorneys at the New York City Human Rights Commission dedicated to combatting this widespread and pernicious form of discrimination.
- Require transparency in rental application processes and outcomes
- Increase the testing and enforcement capacity of the Human Rights Commission. For example, ghosting can only be combatted using paired fair housing testing. There is an urgent need for testing and enforcement in this area.
- Create a centralized system to track source of income discrimination and hold repeat offenders accountable
- Fund “know your rights” public education campaigns to combat HIV-related stigma, racial bias in housing, and empower victims of source of income discrimination

In addition, for the last two years, Housing Works and the End AIDS New York Community Coalition have called on the City Council to **Fund Non-Profit Legal Services Organizations to Address Source of Income Discrimination**, since this persistent and widespread program requires more widespread, consistent, and effective legal action to enforce the City’s prohibition

on source of income discrimination. We have called for \$4M in funding annually to support contracts with non-profit organizations with a record of successful litigation to address the continued illegal discrimination by brokers and landlords who refuse to accept government-funded rental subsidies and vouchers.

This is not just a housing issue—it is a human rights issue. Every New Yorker deserves a safe, stable place to live, regardless of their health status or how they pay their rent. Let us make New York City a leader in housing justice.

Let us ensure that no one is denied a home because of HIV, race, or because their income comes from a voucher instead of a paycheck. And we must dispel the myth that those with vouchers do not have a job. The voucher structure encourages employment. Most housing vouchers require tenants to pay a portion of rent based on their income (typically 30%). So, working increases their contribution but also helps them afford other essentials. Vouchers cover rent, but not utilities, food, transportation, childcare, or healthcare. Employment and other safety net supportive services cover these gaps. Many voucher holders are parents, and working is essential to support their families.

Finally, I would like to raise one additional issue that impacts housing inequities among marginalized New Yorkers. Housing Works is grateful for the improvements to the CityFHEPS program enacted by the City Council, and fully support efforts to enforce their full implementation. However, we have longed urged the Council and Administration to expand eligibility for CityFHEPs beyond residents of shelters operated by the NYC Department of Homeless Services, to include residents of any type of NYC emergency or transitional housing such as the transitional housing program that Housing Works operates for the Mayor's Office of Criminal Justice (MOCJ) and young adults (16-24) who access shelter through NYC's Department of Youth and Community Development.

For example, the MOCJ Emergency and Transitional Housing Program (MOCJ ETH) provides up to twelve months of a safe, stable place to live for people leaving incarceration without housing, while providing vocational, educational, and therapeutic services as well as assistance to secure permanent housing. Housing Works, as one of several non-profit MOCJ ETH program providers, provides safe housing combined with skills building, job training, access to medical and behavioral health services, and housing placement assistance. However, while many of our program participants complete job training and secure employment, they are not able to afford housing on the open rental market.

Now that the supply of Emergency Housing Vouchers (EHV) made available to participants during the COVID crisis is exhausted, our successful MOCJ ETH participants find that they are not eligible for any other housing subsidies. The MOCJ transitional Housing Programs generate

reductions in shelter and jail use, inpatient hospitalizations and related Medicaid costs, and substance use. However, this worthwhile investment is squandered when at the end of a successful 12-month transitional housing stay, participants who have completed educational and job training programs, and are stable and employed, are pushed back into homelessness in the mass shelters or on the streets, and in the worst-case scenario end up back in jail. It is simply unjust and inequitable to deny CityFHEPS vouchers to residents of City emergency or transitional programs simply because they are not operated by a City agency other than the Department of Homeless Services.

Thank you for your time and your commitment to equity.

References

- Settlage, R. (2022). HIV Is Not a Crime: The Failure of New York’s Housing Law to Protect People Living with HIV/AIDS, *Utah Law Review*, 2022(3), Article 6.
- Merjian, A. H. (2023). Second-Generation Source of Income Housing Discrimination. *Utah Law Review*, 2023(5), Article 2, 1–45, <https://dc.law.utah.edu/cgi/viewcontent.cgi?article=1364&context=ulr>
- Unlock NYC. (2023). Source of Income Discrimination Report, <https://www.unlocknyc.org>
- NYC Commission on Human Rights. (2023). Annual Enforcement Report, <https://www.nyc.gov/assets/cchr/downloads/pdf/publications/Annual-Report.pdf>

Committee on Civil and Human Rights
“Oversight- Housing Discrimination and Inequity”

Testimony from African Communities Together
October 3, 2025

Good afternoon Chair Williams and members of the Committee on Civil and Human Rights. Thank you for holding today’s important hearing on housing discrimination and inequity.

My name is Airenakhue B. Omoragbon and I serve as the New York Policy Manager at African Communities Together. In this capacity, I drive our Right to Shelter, Hair Braiding, and Language Access campaigns, and I also work full-time on the Language Justice Collaborative (LJC) to eliminate language and cultural barriers to immigrants’ access to public services.

I am here today to shed light on the unfair treatment African immigrants face in New York City’s shelter system and general housing market. In doing so, I urge the City Council to request that the Commission on Human Rights do more to educate African communities on Human Rights Law, and encourage them to report their experiences with housing discrimination and inequity.

As a national membership organization that is by and for African immigrants, ACT is dedicated to fighting for civil rights, opportunity, and a better life for our communities in the United States. We are headquartered in Harlem and the majority of our members hail from countries like Senegal, Mali, Ivory Coast, Sudan, and Mauritania.

Studies show there are an estimated 172,712 immigrants from sub-Saharan Africa, living in New York State, and in New York City alone, there are approximately 86,694 speakers of African languages. If I were to give you a snapshot of the organization’s membership, you would also see that:

- 60-65% of our members are women;
- Two-thirds of the members of our NY Chapter are Muslim; and
- Even though we are a cross-class organization, the majority of our members are low-income and living below the Federal Poverty Line (FPL).
-

Due to these social constructs like race, religion, national origin, immigration status, gender, and so much more, African immigrants are among New York’s most language-isolated communities, and are extremely susceptible to housing discrimination and inequity.

Here is a case in point: One of our members, who I will name Aisha, was born and raised in Mali, and moved to the United States in 1987. She had been living in her apartment in Harlem for 25 years and was one of the first three tenants to move into her building. However, despite living there, raising her 5 children there, and calling it home for decades, her apartment has turned into a source of stress, danger, and humiliation.

She is currently living with a family of rats and every time she takes a shower, it floods her neighbor's apartment down below. Last year, her stove stopped working and management refused to fix it. She had no choice but to cook food using an airfryer, ask her neighbors to borrow their stove, and ultimately ended up spending \$1000 to buy a new stove for her apartment.

She filed complaints, attended HPD action hearings, to no avail. However, while long-time tenants, who are Black and African like her were ignored, she watched new people, of different skin tones move into the building and be treated with respect.

With our mission and vision in mind, ACT is committed to speaking truth to power in this fight against inequity and discrimination. Inspired by our members, we launched our Right to Shelter Campaign and established a Housing Justice Committee, to respond to Mayor Adams 30-60 day rule, which put limits on New Arrivals' abilities to stay in the Humanitarian Emergency Response and Relief Centers (HERCs). We even hosted a sleep-in in front of Gracie Mansion.

We continue to do this work in 2025 and beyond because there are so many African immigrants who have issues that are similar to Aisha's, but are afraid of reporting their landlords and building managements to the Commission on Human Rights. We are giving voice to our community by dedicating our efforts to:

- Educating African immigrants on the housing resources that are available to them in NY State;
- Fighting against the challenges that anti-Black, anti-Muslim, and anti-Immigrant sentiments create for immigrants in need of housing; and
- Ensuring that permanent immigration status does not serve as a barrier for accessing vouchers, lottery, and any other housing opportunities available in New York State.

We created the first and premier African language co-operative, worked with City Council over the last few years to ensure Muslim immigrants living in City shelters receive culturally-sensitive care, and currently run a mental health program aimed at supporting asylum seekers in managing the trauma they've experienced in their transition to life in the United States.

We encourage you to see us as a resource in better serving this community, and encouraging that they won't be silenced in the face of inequity.

Thank you.

Submitted by:

Airenakhue B. Omoragbon, MSSW, LMSW

NY Policy Manager

African Communities Together

Committee on Civil and Human Rights

“Oversight- Housing Discrimination & Inequity”

Testimony from African Communities Together

October 3, 2025

Good afternoon Chair Williams and members of the Committee on Civil and Human Rights. Thank you for holding today's important hearing.

My name is Muhammad Musah. I am Ghanaian and the Lead Community Organizer at African Communities Together. At our New York Chapter, I am responsible for growing and engaging our membership base.

I am here today to support our members, as they speak truth to power and recount their experiences with housing discrimination and inequity, here in New York City. I felt compelled to testify today, because outside of my role as a professional advocate, I have also experienced the failures of our housing system right here in Harlem. In sharing my story, my hope is that our members will also see that housing is not just about shelter — it's about safety, dignity, and human rights, and they don't need to be silent in the face of injustice.

Here is my story: I lived in my apartment on 118th street in Harlem for three years. It was my home — a place where I built my life and community. Then, one day, without warning, I discovered my name was no longer on the building's virtual doorman list. Soon after, my key fob stopped working altogether. Suddenly, despite paying my rent religiously, I could no longer access my own home.

When I reached out to my landlord, I was ignored. Weeks went by before the management company finally told me the reason: the landlord had been illegally leasing the unit to me. I don't know if this was because they see me everyday wearing my prayer thobe or if it is because I don't look like I make much money or because I am an African..but it's not right.

As a six foot three, Black man in New York City, being locked out of my building was not just an inconvenience — it was dangerous. I often had to wait hours outside, hoping someone would let me in, while worrying about how I might be perceived or treated just for trying to enter my own home. I felt unsafe. I felt invisible. And I felt powerless.

This experience is why I do the work that I do today. At African Communities Together, we started our Housing Justice Committee so that people from African communities can have voices fighting for housing injustice that look and sound just like them. We want to ensure that tenants have a voice, immigrants know their rights, and so that every person has someone fighting for them, just as people once fought for me and my family when we sought asylum in this country.

At this time, I urge the City Council to strengthen tenant protections and hold landlords accountable so that stories like mine become the exception, not the norm.

Thank you.

Submitted by:

Muhammad Musah

Lead Community Organizer

African Communities Together



STATEMENT OF NEEDS TO BE ADDRESSED

The City can create all the housing it wants in the future, but unless it protects the tenancies of the millions of poor and disabled tenants now living in affordable housing, we will lose units as fast as we gain them.

HOUSING LEGAL SERVICES

As of 2023, New York City has over 2.3 million renter-occupied units, with the majority of households renting their homes. While the exact number of individual tenants is not available, the number of renter-occupied housing units provides an estimate of the tenant population, which is over 40% of the total population and is more than the number of people in most U.S. states.

Approximately 20% of New York City households include a person with a disability, and disabled individuals are over-represented in public and subsidized housing, with 43% of public housing and 35% of subsidized households including a disabled person. The City's Office for People with Disabilities states that there are nearly one million people with disabilities in NYC, which is about 11% of the total city population.

A 2023 Community Service Society (CSS) report lays out the data on housing as follows:

DISABILITY, BY HOUSING TYPE

Does Any Person in the Household Have a Disability?

	NYC	Public Housing	Subsidized Rental	Regulated	Unregulated	Shared-Equity Homeowner	Homeowner
Yes	22%	43%	35%	24%	14%	23%	30%
No	78%	57%	65%	76%	86%	77%	70%

The CSS continued in its report as follows:

- **New Yorkers with disabilities** are more than twice as likely to live in poverty as those without disabilities because of pervasive job discrimination and other barriers to employment like the inaccessibility of the City's public transit network.
- **Households living in public and subsidized housing are more likely to include seniors than market or rent regulated rentals.** One-third of households in New York City include a person over 62 years of age. In public housing, 41 percent of households include a senior; the share is even higher in subsidized housing: 54 percent. [Seniors have higher percentages of disabilities.]
- **Low-rent apartments within the private market, including both regulated and unregulated units, are often not accessible.** For example, less than a third of occupied units in NYC are accessible without climbing any steps. **In public or subsidized buildings, more than half of apartments are not reachable without use of steps !!!!!**

"Keep your face to the sunshine and you cannot see the shadows."

"The true test of character is to face hard conditions with the determination to make them better."

—Helen Keller

The CSS survey also shows housing in New York City is becoming more expensive and less habitable, with 24 percent of New York City homes reporting rodent infestations, 18 percent reporting leaks, 17 percent reporting cracks in ceilings or floors, 16 percent reporting winter heat outages, and 9 percent reporting mold. They reported: “If we treat these kinds of housing deficiencies as metrics of overall housing health, and we count the number of deficiencies reported by housing type, two clear trends emerge: owner-occupied private housing residents reported the fewest deficiencies, with 84 percent of respondents reporting 0 or 1 maintenance problem, while public housing residents reported the most deficiencies, with a majority of residents (61 percent) reporting 2-7 deficiencies. Of these, a staggering 15 percent (or nearly 1 in 6 public housing residents) reported having 5 to 7 maintenance deficiencies.”

Most of CIDNY’s consumers, or potential consumers, reside in subsidized housing or NYC Housing Authority (NYCHA) housing. Then there is a hybrid group: residents whose buildings were once NYCHA, but which have been “rented,” under a program called RAD/PACT, to private entities which run them as Section 8 developments. (NYCHA is under Section 9 of the US Housing Law of 1937.)

Right to Counsel

Mark Levine, who will become City Comptroller in January, describes the Right to Counsel situation on his website as follows:

In 2017, New York passed a first-in-the-nation right to counsel law, which guarantees tenants a free attorney in housing court. The law succeeded at keeping the vast majority of tenants in their homes, and New York thankfully had an eviction moratorium in place during the first two years of the pandemic. But once the moratorium lapsed, eviction cases started to pile up. Now, the number of tenants who need representation has far outpaced the capacity of right to counsel attorneys, and tens of thousands of tenants are being made to navigate housing court on their own.

Forcing cases through the court system without securing tenants an attorney is a clear violation of the right to counsel law. We must act now to protect tenants from unfair eviction.

Slow the Calendaring of Eviction Cases

The legal services organizations that represent tenants facing eviction are at capacity, unable to take on more clients at the current pace. The Office of Court Administration must stop the breakneck speed and calendar cases at a pace that ensures that every tenant has access to the attorney the law promises. Cases where a tenant is unable to secure a right to counsel attorney must be administratively stayed and taken off the calendar until the tenant has an attorney under retainer.

Before CIDNY hired me as in-house General Counsel, the CIDNY staff would refer consumers with housing problems to legal services entities which got Federal or City funding to represent tenants, from Legal Service Corp providers (like Mobilization for Justice Legal Services) to the Legal Aid Society to not-for-profits like NY Lawyers for the Public Interest. But as Levine says, those entities are over capacity.

In some courthouses a tenant in court for the first time will be sent to meet with a “Right to Counsel” attorney, only to find that they have reached their capacity for that day.

I recently went to Housing Court for a disabled client who was facing three separate eviction cases from the same landlord, Stanley Avenue Development, a RAD/PACT created entity now running two former NYCHA developments in Brooklyn. I looked up her case and found that this same landlord, who had 1900 units, had eviction cases going against 190 tenants. Only 10 had lawyers, and that included my client. I asked my client, who is disabled, what percentage of her neighbors had disabilities, and she told me “over 50%.” All should be getting Section 8 benefits; most do not. They are likely eligible for Disability Rent Increase Exemption (DRIE) or Senior Citizen Rent Increase Exemption (SCRIE), but have no idea. And the landlord wants to push them out in order to be able to rent their apartments on the open market, which they believe that they can do.

Some of our Consumers who are fortunate enough to receive a 70% housing subsidy are lucky because these housing subsidies are not abundant for people with disabilities. Additionally, under the Olmstead decision, CIDNY’s transition and housing specialists are tasked with helping consumers transition from nursing homes to independent communities living with disability-related support. All of these consumers must pay 30% of their income for these accessible apartments. Most of our consumers receive social security income (SSI) or social security disability income (SSDI). For most disability types, the maximum payment is a little under \$920 per month. This amount must cover consumers’ day-to-day needs, including 30% of their rental income while living in New York City.

When examining this housing dilemma, our consumers are very challenged, living in an extremely expensive and inaccessible city. When housing situations become legal matters—involving courts, landlord disputes, accessibility violations, or eviction proceedings—most tenants consumers hit a wall. Our consumers consistently return frustrated from these referrals, highlighting the critical need for in-house legal expertise that fully understands both disability rights and New York City’s housing market. Additionally, access to legal assistance is limited, because most organizations that provide free legal assistance have long waiting lists and may have limited knowledge of the housing accessibility needs for people with disabilities.

CIDNY’s housing work has a significant impact—in 2024-25 we helped 2,655 people with housing assistance and saved New York State \$6,660,348 by helping people transition out of nursing homes or avoid institutional placement altogether. Additionally, our benefits counseling team works with numerous consumers who are experiencing challenging housing needs. But we are seeing too many cases which both our housing specialists and benefit counselors simply cannot handle without legal expertise and interventions.

Why This Matters Now

New York City’s housing crisis hits people with disabilities especially hard. Our consumers are not accurately represented in housing court by the Right to Counsel (RTC) program because there is not enough City funding allocated to sustain its ability to properly address the needs of people with disabilities. Our consumers face the double burden of limited affordable options and landlords who often ignore accessibility requirements, despite clear legal mandates outlined in the Americans with Disabilities Act and the State and City Human Rights Laws

What Needs to Be Done

- **The Right to Counsel Program must be expanded at least 5-fold. When I look at a list of 190 cases from one landlord, and find that only 10 have lawyers, we have a crisis.**
- **The NYC Housing Authority, as it turns over developments to private entities, must vigorously monitor what they do—and if they are incapable of doing that, then the City Council must fund HPD better so that it can do the job.**
- **The City has to make existing housing programs for the poor and disabled better known. DRIE can be a lifeline for disabled tenants, but few know about it.**
- **The City has to expand its Housing Voucher program, as we see Federal funds, already inadequate, cut back.**
- **The laws against tenant harassment need to be strengthened; Stanley Avenue Preservation wouldn't be trying to evict 190 tenants, 10% of its tenants, if there were stronger provisions making them pay for this abuse.**
- **Far greater enforceable requirements need to be put in place so that New Yorkers with disabilities can find affordable, accessible housing. In fact, we recommend that all statements about “affordable housing” be amended to “affordable, accessible housing.”**

Testimony on Housing Discrimination and Inequity

10/03/2025

My name is Mbacke Thiam. I am the Housing and Health Community Organizer at Center for the Independence of the Disabled, New York (CIDNY). We are a nonprofit organization founded in 1978. We are part of the Independent Living Centers movement, a national network of grassroots and community-based organizations that enhance opportunities for people with disabilities to direct their own lives. CIDNY advocates for people with disabilities in the five boroughs of New York City. We are happy to testify today on Housing Discrimination and Inequity.

Affordable and Accessible Housing Crisis

NYC's housing crisis is driving people into homelessness in a time of federal cuts as the cuts could affect over 170,000 people in permanent housing and millions more could lose rental assistance. The City needs to invest in public housing and shelters in order to fight homelessness. -In addition to making the housing system affordable to the working class, the City also needs to fund accessible public housing for disabled New Yorkers. People with disabilities need reasonable accommodations in public housing developments and public shelters.

Discrimination based on Source of Income and Disabilities

Despite the NYC housing crisis, landlords and brokers often refuse to provide apartments and set up unnecessary hurdles for tenants with housing vouchers. This is unlawful and harmful to the disabled community. Seniors and people with disabilities are left in shelters and illegally denied accessible homes that fit their needs.

Also, we advocate for a fair and just proceeding of housing applications to combat the discrimination that people with disabilities may encounter when their disabilities are disclosed. We strongly advocate for fairness in selecting applicants for apartments and homes without disqualifying people because of their requests for reasonable accommodations.

This discrimination worsens the housing crisis. Some programs, such as Section 8 and City Fheps, that are designed to lift our community out of poverty, should not be disqualified. We should increase penalties for landlords and brokers who repeatedly violates the law.

Expansion of SCRIE and DRIE Programs

The City needs to fund and expand some housing programs for ~~the~~ seniors and disabled residents. Some programs, like Senior Citizen Rent Increase Exemption (SCRIE) and Disability Rent Increase Exemption (DRIE), which help freeze rents, are very important for our community. That is why CIDNY supports the following legislation:

- **S3563 / A2367** (Cleare / Epstein): Permits other qualifying members of a household to qualify the household for DRIE when they are not the head of household.
- **S1457A / A5344** (Kavanagh / Glick): Would increase the maximum income threshold for SCRIE, DRIE, Senior Citizen Homeowners Exemption and Disabled Homeowners Exemption (DHE) eligibility to \$67,000 and index it to inflation thereafter.

Right to Counsel and Fair Housing Trials

Legal representation of tenants who are facing eviction is very important for keeping families together. Our Court system operates as an eviction machine that kicks people out of their homes if they are not represented by a housing attorney who could help them to:

- Challenge improper filing procedures
- Ensure landlords follow correct legal procedures
- Argue for repairs, reasonable accommodation, rent abatement, etc.
- Dismiss cases if landlords' paperwork is defective
- Enforce Court mandated repairs and/or accommodations
- Gain extra time to move forward without eviction

Tenants who are left to argue at Housing Court without attorneys, are often unable to defend themselves. They may be subject to eviction without proper trials. This is unlawful in NYC where "Right to Counsel" mandates legal representation before eviction and should be provided.

We thank the New York City Council's Committee for providing us the opportunity to testify before Chair Natasha Williams, Chair Rita Joseph, and all the members of the panel. We look forward to helping provide a fair and equitable housing system in NYC.

Thank you,

Mbacke

LEGAL SERVICES NYC

TESTIMONY TO NEW YORK CITY COUNCIL, COMMITTEE ON CIVIL AND HUMAN RIGHTS – OVERSIGHT HEARING OCTOBER 3, 2025

Thank you to the Committee and to Chair Williams for holding this hearing today on such a crucial issue. My name is Jeremiah Schlotman, and I am the Director of Housing Litigation at Legal Services NYC, the largest civil legal services provider in the nation, providing legal representation to tens of thousands of low-income New Yorkers every year.

Our clients experience housing discrimination in a wide variety of ways, all of which dramatically impact their ability to break down the barriers trapping them and their families in poverty. For example, our clients *routinely* face source of income discrimination, with landlords and brokers refusing to even discuss renting apartments to people once they learn that they receive any form of housing subsidy or simply ceasing communication after vigorous discussions coincidentally upon learning of the prospective tenant's subsidy. Our clients also experience "steering" on the basis of their source of income, with brokers only showing them the "section 8 buildings" or "voucher buildings," in an attempt to warehouse low-income families together, away from higher income renters. This, predictably, reinforces this City's longstanding residential housing segregation, and the uneven availability of resources between communities that frequently accompanies this segregation. Moreover, source of income discrimination means that those most in need and for whom City, State, and/or Federal legislatures have appropriated money to help are unable to realize that assistance and are often facing or experiencing homelessness unnecessarily, which is both an inhumane trauma on families and a needless significant burden on taxpayers.

At Legal Services NYC, we regularly file lawsuits against landlords for source of income discrimination. However, this problem is so pervasive that our individual lawsuits have little effect for anyone other than our individual clients. Moreover, our clients are laser focused on avoiding homelessness—their priority, understandably, is getting housed, not holding bad actors to account. As a result, unlawful conduct often goes unpunished. The same problem arises for our

Demand Justice.

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clients experiencing race, national origin, and gender identity discrimination in housing. Leaving enforcement of some of our most important laws to people struggling to survive means that bad actors often get away with repeated unlawful behavior.

This is precisely the kind of problem that requires a citywide solution. Specifically, the New York City Commission on Human Rights, which is tasked with enforcing our City's antidiscrimination law, is in a unique position to be able to provide broad and impactful enforcement of the New York City Human Rights Law. For example, because the Commission has insight into all the complaints filed, it is able to determine which landlords are the worst offenders and direct enforcement accordingly, or otherwise structure settlements or orders to ensure ongoing compliance. However, due to a chronic lack of funding and staffing, the Commission is unable to fully realize its potential, a potential that could have sustained and significant effects on low-income families in New York City trying desperately to avoid homelessness.

Our unique municipal human rights law and the commission that enforces it have taken on a renewed importance, as we watch our federal housing discrimination agencies be reduced to little more than rubble. Now, more than ever, we must stand up to protect New York City's laws and New York City's values. Thank you.

Sincerely,

/s/ Jeremiah Schlotman

Jeremiah Schlotman
Director of Housing Litigation
Legal Services NYC



New York City Council Oversight Hearing: Housing Discrimination and Inequity

**Neighbors Together Testimony
Written by Amy Blumsack, Director of Organizing & Policy**

October 3, 2025

Neighbors Together would like to thank the New York City Council Committee on Civil and Human Rights Chair Williams, as well as the other committee members for the opportunity to submit testimony.

About Neighbors Together

Neighbors Together is a community based organization located in central Brooklyn. Our organization provides hot meals five days per week in our Community Café, offers a range of one-on-one stabilizing services in our Empowerment Program, and engages members in community organizing, policy advocacy and leadership development in our Community Action Program. We serve approximately 120,000 meals to over 12,000 individuals per year. Over the past year alone, we have seen a 40% increase in the number of meals we are serving, and we see new people on the line every day.

Our members come to us from across the five boroughs of New York City, with the majority living in central Brooklyn. Nearly 60% of our members are homeless or unstably housed, with a significant number staying in shelters, doubled-up with relatives or friends, and living on the street.

Over the last five to ten years, our members increasingly report that homelessness and lack of affordable housing options are their primary concern. Our data backs the anecdotal evidence we see and hear from our members daily: an increasing number of our members are either living in shelter with vouchers for years at a time, ineligible for a voucher, or unable to find permanent housing due to rampant source of income discrimination and a vacancy rate of under 1% for affordable housing units in New York City.¹

¹<https://www.nyc.gov/site/hpd/news/007-24/new-york-city-s-vacancy-rate-reaches-historic-low-1-4-percent-demanding-urgent-action-new#/0>



Our Work with Voucher Holders

Neighbors Together has been organizing voucher holders since 2018. We conduct Know Your Rights trainings on how to identify and report source of income (SOI) discrimination, and Housing Search Workshops where voucher holders get additional support in their housing search and assistance on filing source of income discrimination complaints to the City Commission on Human Rights (CCHR) when needed. We work closely with CCHR to ensure that source of income discrimination reports are effective and have the best possible outcomes for our members. We also partner with CCHR on their restorative justice set-aside program² to ensure that set-aside units obtained through settlements are most likely to go to people in need as efficiently and effectively as possible. Additionally, in partnership with Unlock NYC, we built and launched the Stop Source of Income Discrimination (SID) NYC website,³ which provides information about source of income discrimination and how to report it as well as a mechanism for reporting via the website.

We work closely with Unlock NYC⁴ to improve New Yorkers' ability to utilize their vouchers. Starting in 2019 our members worked with the Unlock team to design and test an online tool to help voucher holders easily report source of income discrimination. The tool has enabled hundreds of our members to quickly and easily gather evidence and report source of discrimination to CCHR. In our partnership with Unlock NYC, we have released multiple reports on source of income discrimination and voucher efficacy, including "An Illusion of Choice," the SOI mapping tool, the "Serial Discriminators List"⁵, as well as ongoing budget advocacy to ensure CCHR is adequately funded to enforce against SOI discrimination.

After over a year of collecting data through the Stop SID NYC website, running know your rights trainings and conducting housing searches for people with vouchers, Neighbors Together built a grassroots organizing campaign of directly impacted people who had voucher shopping letters but couldn't find housing. The **VALUE in Housing (Voucher Advocates Lifting Up Equity in Housing)** campaign created a platform of 5 policy reforms aimed at making vouchers effective tools for accessing permanent affordable housing. Since launching in 2019, the VALUE in Housing campaign has won a significant portion of its platform, including:

²<https://gothamist.com/news/nyc-requiring-landlords-set-aside-apartments-voucher-tenants-under-new-approach-enforcing-human-rights-law>

³ <https://www.stopsidnyc.com/>

⁴ <https://weunlock.nyc/>

⁵ <https://weunlock.nyc/data/>

- Ensuring that CityFHEPS voucher holders receive know-your-rights information about SOI discrimination upon receipt of their shopping letter
- Increasing the size of the source of income unit at CCHR
- Increasing the payment standard of CityFHEPS to fair market rent
- Improving income requirements for CityFHEPS vouchers so that recipients can increase their income until they are financially self-sufficient without fear of losing their voucher.⁶

Importance of the City Commission on Human Rights (CCHR)

From early in our work with voucher holders, the City Commission on Human Rights has been one of our most important resources for getting our members housed. Rampant source of income discrimination is a nearly universal experience for voucher holders; the majority of our members with rental assistance vouchers have searched for housing for months and come up empty handed because they experience SOI discrimination with nearly every call.

The Commission on Human Rights is the only city agency that enforces against discrimination on behalf of the individual who was discriminated against. Other agencies can bring litigation against discriminators, but the penalties don't go to the person who experienced the discrimination. CCHR is the primary means by which voucher holders can receive restitution. This restitution can take different forms: monetary compensation for damages, access to view an apartment or access to an application, or an apartment itself.

One of the practices of the Commission that has been most beneficial for our members is the pre-complaint intervention (PCI). If a voucher holder submits a complaint of SOI discrimination and there is enough evidence to support that claim, then the SOI Unit will intervene by reaching out to the landlord or broker to inform them about SOI discrimination and the city's human rights laws. This is often enough to make the landlord or broker reconsider, and our members often get housed as a result. PCI's are one of the fastest ways our members can secure housing with their voucher.

Another important tool that CCHR uses to help voucher holders secure housing after being discriminated against is their set-aside program. When negotiating settlements with landlords who discriminated against voucher holders, the Commission frequently negotiates for set aside units that will be held explicitly for voucher holders.

⁶ <https://www.stopsidnyc.com/get-involved>



Litigation is another important tool, and when CCHR is adequately staffed, it has the capacity to pursue litigation on behalf of voucher holders, as well as impact litigation. That said, members of Neighbors Together almost always want to focus on securing safe and stable housing before they pursue litigation. For many, the stability of housing gives them the mental and emotional bandwidth to consider or follow through on bringing litigation against a discriminating party.

When adequately staffed, the SOI Unit at CCHR is a life raft for voucher holders who are drowning in the unforgiving and inequitable sea of New York City housing. For that reason, it is critical that the Commission be resourced to meet the demand.

Support the City Commission on Human Rights to Meet Demand

As civil and human rights protections are being actively dismantled at the federal level, the City Commission on Human Rights (CCHR) will play an increasingly critical role in protecting the most vulnerable groups in New York City, whether it be against housing discrimination, workplace harassment, illegal workplace exploitation, or other discrimination. As protections at the federal level are shrinking, the number of protected classes in New York City are among the most robust in the country, with over 27 protected classes. The administration and City Council must **make robust investments in the Commission on Human Rights** to ensure it has the resources and capacity to meet the growing need.

In addition to increased funding for CCHR, the City, particularly OMB, must **remove barriers to hiring and timely onboarding**.

- **Exempt CCHR staff from hiring freezes** - The city must classify attorneys at CCHR as “critical” positions and exempt them from hiring freezes.
- **Increase attorney salaries at CCHR** - Salaries at the Commission need to be raised to competitive rates in order to attract and retain experienced attorneys. Currently CCHR staff attorneys make significantly less than their counterparts in other government agencies, or at nonprofit legal services providers. At minimum, salaries of staff attorneys at CCHR should match those of staff attorneys at the City Law Department.
- **Exempt CCHR from 2:1 hiring allotments**- CCHR should be exempt from the two-to-one allotment mandate from OMB, which requires that two people leave the Commission before it can hire one new person. The two-to-one allotment process stymies the Commission’s ability to fill the staff lines for which they’ve been budgeted. Often, that

inability to fill budgeted staff lines is used as an excuse not to provide additional funding in the following fiscal year.

- **Fast-track hiring processes-** When CCHR is able to hire for staff lines within the parameters outlined by OMB, the hiring process should be fast-tracked. The process of job posting, interviewing, offering, and then background checking and getting final hires approved can take such a long time that the Commission and the people seeking CCHR's assistance are losing out on qualified, passionate candidates. It is important to fast-track all hiring processes so that CCHR is able to bring on and retain quality talent to help further their mission.

Address Source of Income Discrimination

Neighbors Together's VALUE in Housing campaign introduced our [End Source of Income Discrimination Bill Package](#) in City Council in March of 2025. These bills (Intros 1210-1215) will help remove one of the most persistent barriers that homeless New Yorkers face in accessing housing - source of income (SOI) discrimination. The bill package was developed by members of Neighbors Together's who are voucher holders with lived experience of source of income discrimination. Our members created this set of bills to address weaknesses in the enforcement against this illegal but all too common form of discrimination. The bill package is designed to create meaningful financial disincentives for landlords to discriminate against voucher holders. The bills will do this by:

- Increasing fines for violations of Commissioner's Orders (Intro 1210)
- Mandating increased fines for discrimination based on landlord portfolio size (Intro 1211)
- Banning credit checks and minimum income requirements for voucher holders (Intro 1212)
- Adding SOI discrimination to the Certificate of No Harassment Program (Intro 1213)
- Making SOI discrimination findings publicly available (Intro 1214)
- Create standards for transparency in tenant screening criteria (Intro 1215)

Neighbors Together's members feel that it is critically important that bad actors experience real and meaningful consequences for discriminating against housing seekers. As noted by Unlock NYC's report on serial discriminators⁷, the landlords who were most frequently reported for SOI discrimination were large landlords. For these kinds of bad actors, the current penalties for SOI discrimination are a drop in the bucket, or simply the cost of doing business. Intro 1211 is designed to increase fines for housing discrimination based on portfolio size, which would create

⁷ <https://weunlock.nyc/reports/serial-discriminators/>



civil penalties that take into consideration the profit that a landlord is making. Neighbors Together was heartened by CCHR's 2024 settlement with Parkchester Preservation Management⁸ for \$1 million dollars in civil penalties, and 850 units set-aside for voucher holders. Our hope is that Intro 1211 will create more settlements of meaningful size to disincentivize bad actors.

All of the bills included in our End Source of Income Discrimination Bill Package will discourage landlords from engaging in SOI discrimination and other types of housing discrimination. Vouchers are a proven solution for moving people out of homelessness and into stable homes, but they would work much more efficiently and effectively to move people out of homelessness if SOI discrimination were no longer such a pernicious barrier. These bills are a key piece of the puzzle in addressing the housing and homelessness crisis in New York City, and we urge the Council to pass them as soon as possible.

Strengthening and Maximizing CityFHEPS

CityFHEPS is a proven tool in the fight against homelessness. In the midst of the city's housing affordability crisis, a symptom of which is the historically low vacancy rate of less than 1% vacancy for units under \$2,500 per month, CityFHEPS is one of the primary tools that moves low-income and extremely-low-income New Yorkers out of homelessness and into stable housing.

As hundreds of thousands of New Yorkers face potential homelessness due to federal safety net cuts, the City must ensure that it **funds CityFHEPS vouchers at the full level of need**. Commissioner Park has been messaging that the City cannot afford to cover the need for vouchers, but that is a shortsighted approach to the problem of homelessness. The Department of Social Services must **stop passing harmful policy changes to CityFHEPS** that will increase and/or prolong homelessness; increasing voucher holders' rent portion to 40% of their income in their 6th year of CityFHEPS, and ending the unit hold incentive are two examples of policies that claim to create cost savings, but will cause more harm and financial strain in the long run. To this end, Neighbors Together would like to voice its **support for Intro 1372**, which would limit CityFHEPS voucher holders' portion of their rent to 30% of their income.

The Council must continue to push the administration to **implement the expansion of CityFHEPS through local laws 100-102**. One of the best approaches to homelessness is to



keep people in their homes and avoid homelessness altogether. These local laws will help do exactly that.

Additionally, the administration should include **funding for increased hiring in the Human Resources Administration and Department of Homeless Services** to ensure that vouchers are distributed and leased up smoothly and efficiently. There should also be a tranche of **funding to address longstanding administrative barriers in the CityFHEPS program**.

Capital Investment in Housing for ELI and VLI Individuals

New York City's civil and human rights protections are more important than ever, given the current federal landscape. That said, if more housing in New York City were targeted to extremely low-income (ELI) and very low-income (VLI) individuals, they would still face housing discrimination, but they would have a higher chance of securing housing simply due to the increased availability. Being housed helps reduce disparities in other key areas such as health and education.

Various past administrations have touted their housing plans and the number of units built, but **there has been a longstanding mismatch between the affordability levels of new construction and the income levels of New Yorkers who are homeless, unstably housed, or at risk of eviction**. In the last decade, the number of completed affordable housing rental units targeted to extremely low-income New Yorkers has been less than 30% of the total number of rental units completed.⁹

Federal Budget Cuts and Deepening Inequity

Before the current federal administration took office, federal social safety net funding was already failing to meet the actual need. Prior to last year, the waitlist for Section 8 vouchers was closed for 15 years¹⁰. People on SNAP and Medicaid were already struggling to make ends meet with the benefits they had.

Federal cuts to Medicaid and SNAP in H.R.1 put vulnerable populations at increased risk of homelessness and insufficient or nonexistent medical care. Congress is currently debating the appropriations bills for the Department of Housing and Urban Development (HUD): the House

⁹ <https://www.coalitionforthehomeless.org/state-of-the-homeless-2025/#supply>

¹⁰ <https://www.amny.com/housing/nyc-households-section-8-housing-voucher-waitlist-2024/>



appropriations bill for HUD would include catastrophic cuts and changes to programs that New Yorkers rely on, and although the Senate appropriations bill is better, it will still cause hundreds of thousands of people to lose their housing.

Additionally, with federal cuts to funding for service providers, nonprofits will see an increased need among their clients and a decreased ability to meet the need. All of this will result in increasing inequity across New York City. Extremely low-income and very low-income New Yorkers will struggle more than they already do to make ends meet.

Homelessness and Housing

Emergency Housing Vouchers (EHV) are a lifeline for nearly 8,000 New Yorkers in New York City. Now that the federal government has announced that it will no longer be funding EHV past the end of 2025, thousands of voucher holders are facing the terrifying prospect of returning to homelessness. Although it was recently reported that EHV voucher holders who received their voucher through NYCHA will be able to switch over to the Housing Choice Voucher (commonly known as Section 8)¹¹, nearly 2,500 EHV voucher holders who received their voucher through HPD have no sense of what will happen with their voucher and housing. If no plan is made for those 2,500 EHV voucher holders, then they will very likely all re-enter the traumatic cycle of homelessness, upending whatever stability they have been able to achieve over the last few years of being housed.

Additionally, **Section 8 vouchers** were already underfunded by the federal government, with the need for vouchers far outpacing availability. When the Section 8 waitlist reopened in 2024 for the first time in nearly 15 years, over 630,000 people applied to the waitlist within one week.¹²

Given potential cuts to these critical programs and other key HUD funded housing programs that support low-income and homeless individuals, New York City government must rise to meet the occasion. It is incumbent upon the Adams Administration and City Council to do everything in their power to protect the communities of New York City from the terrible harm these cuts will cause. Listed below are some of the ways the city can do this.

¹¹

<https://gothamist.com/news/nyc-to-replace-thousands-of-rental-vouchers-after-federal-program-expires-but-at-a-cost>

¹² <https://gothamist.com/news/1-week-633000-applications-for-section-8-in-nyc-what-comes-next>



Conclusion

In order to address the impending cuts to federally funded social safety net programs, the City must do everything in its power to protect the people of New York City. Now is the time for the City to show bold leadership and double down on investments in keeping people healthy, housed, and fed. The City must address source of income discrimination by passing the [End Source of Income Discrimination Bill Package](#), remove bureaucratic barriers at the City Commission on Human Rights, and improve and strengthen CityFHEPS.

Without a proper investment in these critical priorities, New York City will continue to see increasing numbers of people falling into homelessness and unable to get out. People living in our city will face mounting food insecurity and hunger. The existing affordability crisis that New York City is already facing, plus the oncoming federal program cuts, require a bold willingness to invest in our city's systems and its people. The priorities outlined above will provide critical positive outcomes for hundreds of thousands of New Yorkers.

For questions regarding this testimony, please contact Amy Blumsack, Director of Organizing & Policy at Neighbors Together, at amy@neighborstogether.org or 929-759-6667..



Testimony of

The Legal Aid Society

before the

New York City Council Committee on Civil and Human Rights:

Oversight - Housing Discrimination and Inequity

October 3, 2025

Chair and Members of the committee, thank you for holding this critical oversight hearing on housing discrimination and inequity.

On July 4, 2025, H.R. 1 became law. It permanently extends tax cuts for the wealthy by slashing funding for social programs, particularly Medicaid and SNAP. H.R. 1 also features deep cuts to rental assistance, public housing, and supportive programs that could mean that millions lose access to voucher-based or project-based assistance, while states and localities are forced to stretch already thin resources to fill the gap. With states suddenly responsible for fragmented block grants, many will be overwhelmed, leading to sharp rises in homelessness, evictions, and housing instability. The federal government's ability and willingness to enforce fair housing protections, oversee delivery of aid, and support vulnerable communities will be weakened, while local affordable housing development, especially for the elderly and disabled, may stall or regress.

Since the current administration began in 2025, the Department of Housing and Urban Development ("HUD") secretary has dramatically reduced the resources devoted to



enforcing fair housing laws. Internal reports and whistleblower statements indicate that HUD’s Office of Fair Housing and Equal Opportunity (FHEO) is experiencing 65-77% staff reductions.¹ Many investigations are delayed or stalled. Basic operations like issuing subpoenas, pursuing settlements, even sending certified mail, now often require approval from political appointees, slowing or halting enforcement.² The policy agenda has also shifted. Key rules and initiatives from recent administrations have been rolled back: for example, HUD terminated the Biden-era “Affirmatively Furthering Fair Housing” (AFFH) rule that required jurisdictions receiving federal housing dollars to assess and address patterns of segregation.³ Also, HUD has halted enforcement of the 2016 “Equal Access” rule (which protected people’s access to shelters and housing facilities according to gender identity) describing it as tied to “far-left gender ideology.”⁴ Grants to nonprofits that investigate housing discrimination are being cancelled or not renewed, including many that handled the bulk of complaint intakes and testing.⁵ The cumulative effect is that many cases that might once have been pursued, especially ones involving systemic or novel claims, are being deprioritized or dropped entirely.⁶ As federal protections and support

¹ <https://www.theguardian.com/us-news/2025/sep/24/trump-housing-urban-development-segregation-whistleblowers>

² <https://www.propublica.org/article/trump-hud-weakening-enforcement-fair-housing-laws>

³ <https://texashousers.org/2025/05/13/affh-rule-trump-fair-housing-removed/>

⁴ <https://nlihc.org/resource/hud-secretary-turner-halts-equal-access-rule-enforcement>

⁵ <https://www.npr.org/2025/03/15/nx-s1-5325936/hud-funding-fair-housing-laws-legal-aid-groups-scott-turner>

⁶ <https://www.propublica.org/article/trump-hud-weakening-enforcement-fair-housing-laws>



recede, New York City will be forced to carry even greater responsibility for protecting vulnerable residents.

Against this backdrop, we submit this testimony to highlight the ongoing and often invisible ways that source of income discrimination continues in New York City's rental market, despite being prohibited under the City Human Rights Law since 2008. Housing discrimination, such as source of income discrimination, continues to pose a significant barrier to the effective use of rental vouchers, undermining the very benefits these programs are designed to provide. Housing providers who wish to discriminate have increasingly moved beyond outright refusals and have, instead, adopted subtler and more sophisticated tactics that make housing effectively unavailable to voucher holders, putting units out of reach and limiting mobility to safer neighborhoods with greater economic opportunity and higher quality schools.⁷

Over the past decade, awareness of the law has increased among housing providers, and many no longer openly state "No Section 8" or reject applicants based solely on receiving public assistance. But while the overt denials have declined, the discrimination has not

⁷ Compounding this problem, recent reporting by the New York Times shows that the federal government has abdicated its enforcement responsibilities; career staff were reassigned or terminated for raising concerns, discrimination cases were blocked or deprioritized, and Fair Housing Act protections were effectively halted



disappeared. It has simply evolved. Landlords and brokers now rely on more subtle methods to exclude tenants based on how they pay rent, not whether they can.

Voucher holders frequently face additional requirements that are not imposed on other applicants. These include demands for co-signers, larger security deposits, or several months of rent in advance. Many housing providers continue to apply income standards that disregard the tenant's subsidy, requiring tenants to earn three times the full monthly rent, even when they are only responsible for a small portion and despite court decisions outlawing this practice. This practice disqualifies applicants not based on financial risk, but based on the structure of their income. Other tactics are even harder to detect. Units may suddenly become "unavailable" once the applicant discloses their source of income. Communication may abruptly stop. Applicants are often discouraged through vague or coded language: they're told that the process will take too long, or that inspections will be a problem. In some cases, housing providers and their agents steer applicants toward less desirable units or buildings, even when higher quality options are available in their price range. Finally, some housing providers take weeks or even months to render a decision on a prospective tenant's application if they have a voucher. These tactics effectively render the application rejected, particularly when an applicant is searching with a voucher like Section 8 that can expire if not used.



These tactics may not involve a direct “no,” but the impact is the same: applicants are denied housing based on their lawful income source. The City’s Human Rights Law is clear, but when enforcement is limited, inconsistent, or reactive, these practices go unchecked. They persist because enforcement has not kept up with the reality on the ground.

These discriminatory practices diminish the ability of voucher recipients to improve their long term social and economic outcomes, perpetuating cycles of concentrated poverty and housing instability. Widespread federal inaction leaves the city with an urgent responsibility to step up enforcement, ensuring that the hidden discriminatory practices are investigated and that tenants’ rights are protected.

To address this and make the City’s Human Rights Law more effective, the New York City Commission on Human Rights (“CCHR”) must take a more proactive and transparent approach to tackling source of income discrimination. CCHR must be adequately funded and take a robust approach that targets hidden discriminatory practices and pursues the more complex cases. CCHR needs more staff and more robust resources dedicated towards source of income discrimination prosecutions, both for the processing of affirmative cases as well as pre-complaint interventions. CCHR staff need access to testers (in real time for “ghosting cases”) as well as robust background check software in order to locate and contact “bad actor” housing providers and brokers. Too often, even when CCHR does respond to a complaint, the City is unable to get in contact with the



alleged discriminator and the conduct goes forward unchecked. This is true for both filed complaints and pre-complaint interventions.

We offer the following recommendations:

1. Take on more affirmative/complex enforcement actions and engage more fully in the courts.

CCHR should pursue broader and more complex cases that address systemic patterns of source of income discrimination, not just individual complaints. This includes initiating impact litigation where appropriate and filing amicus briefs in important court cases that interpret the Human Rights Law. By participating more actively in the courts, CCHR can help shape legal standards, clarify the scope of protections, and demonstrate that enforcement is not limited to administrative remedies. Strong litigation presence signals that violations will be taken seriously and addressed at every level.

2. Issue formal policy guidance and position statements.

CCHR should publicly clarify how the Human Rights Law applies to common but subtle forms of source of income discrimination, such as excessive documentation demands, improper income calculations, or neutral sounding policies that exclude voucher holders. When housing providers lack clear guidance, they may claim ignorance or take advantage of ambiguity. Formal policy positions provide clarity for landlords, brokers, and tenants



alike, helping to close the gap between what the law protects and what tenants experience in the market.

3. Publicize settlements and enforcement outcomes.

When CCHR resolves a case through settlement, a finding of probable cause, or another enforcement action, it should release detailed summaries. Publishing outcomes enhances transparency, deters future violations, and increases public confidence that the law is being meaningfully enforced. These summaries also educate other housing providers about what conduct is unlawful and the consequences of noncompliance. Quiet enforcement fails to shift broader behavior in the rental market.

4. Expand and strengthen proactive testing and investigations.

Testing is one of the most effective ways to detect source of income discrimination, especially when housing providers are using informal or inconsistent methods to exclude voucher holders. Relying solely on tenant complaints places the burden on individuals who may be facing housing insecurity, unaware of their rights, or afraid to speak out. Proactive testing identifies patterns of discriminatory behavior and allows CCHR to intervene early and systemically.

5. Increase enforcement, transparency and accountability.

CCHR should regularly report data on complaints, investigations, and case outcomes,



disaggregated by protected class, including source of income. Without public reporting, it is difficult to evaluate how the law is being implemented or where improvements are needed. Transparent data supports oversight, informs policy decisions, and builds trust among tenants and the public.

6. Conduct regular outreach and education for landlords, brokers, and tenants.

In addition to enforcement, stopping discrimination requires education. CCHR should engage in sustained outreach to ensure that housing providers understand their obligations and that tenants know their rights. Trainings, written materials, and partnerships with community groups are essential to changing practices and reducing the hesitation associated with housing subsidies and non-wage income.

7. Strengthen Protections and Penalties.

The Council should also pass Introductions 1210, 1211, and 1212, which would create real financial consequences for landlords who discriminate, and end credit and minimum income requirements for households with a voucher.

8. Encourage Participation

Incentives for landlords, such as the “unit hold,” which provides an additional month’s rent when a landlord agrees to accept a DSS client and refrain from leasing the unit while



the application is processed, must be preserved, as they encourage compliance and facilitate access for voucher recipients while mitigating potential delays in processing.

Each of these actions would strengthen enforcement, increase compliance, and bring us closer to a rental market where no one is denied a home because of how they pay for it.

The tools exist. What is needed now is the leadership, transparency, and urgency to use them.

Conclusion

We thank the Committees for the opportunity to testify and commend the Council for its dedication to addressing the vast challenges that face New York City households that seek housing opportunity while using rental assistance vouchers.



About The Legal Aid Society

The Legal Aid Society (“LAS”), the nation’s oldest and largest not for profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform. This dedication to justice for all New Yorkers continues during the COVID-19 pandemic.

The Legal Aid Society has performed this role in City, State, and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 2,400 attorneys, social workers, paralegals, and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 26 locations in New York City, LAS provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

LAS’s legal program operates three major practices — Civil, Criminal, and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by LAS’s Pro Bono program. With its annual caseload of more than 200,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States. And it brings a depth and breadth of perspective that is unmatched in the legal profession.

The Legal Aid Society's unique value is an ability to go beyond any one case to create more equitable outcomes for individuals and broader, more powerful systemic change for society as a whole. In addition to the annual caseload of 200,000 individual cases and legal matters, LAS’s law reform representation for clients benefits more than 1.7 million low-income families and individuals in New York City and the landmark rulings in many of these cases have a State-wide and national impact.

The Legal Aid Society is uniquely positioned to speak on issues of law and policy as they relate to homeless New Yorkers and the administration of public benefits. The Legal Aid Society is counsel to the Coalition for the Homeless and for homeless women and men in the *Callahan* and *Eldredge* cases. The Legal Aid Society is also counsel in the *McCain/Boston* litigation in which a final judgment requires the provision of lawful shelter to homeless families. LAS, in collaboration with Hughes Hubbard Reed LLP, settled *Toliver*



v. New York City Department of Social Services on behalf of current and past recipients of CityFHEPS and FHEPS rental subsidies.

Friday, October 3rd, 2025

Testimony to NYC City Hall Council Regarding: CCHR –
Source of Income Discrimination for Section 8 Tenants-

Shalom, Greetings Council Chair Williams and Everyone on this Panel,

My name is Ms. Yolanda Allison, I currently reside at the **Axel Building** an HPD Housing Connect Lottery Affordable Unit, and I am a Section 8 tenant who has faced numerous rejections solely because I am a voucher recipient. Today, I want to share my experiences and advocate for the end of Source of Income (SOI) discrimination, in addition to Safe, Quality and Affordable Housing.

Two years ago, thanks to the assistance of "**We Unlock NYC**", **CIDNY** and "**CCHR Agents**," I finally secured an affordable apartment through the NYC HPD Housing Connect Lottery. However, I quickly learned that both the landlord and HPD failed to inform us about significant issues related to the property: my apartment is directly beneath a commercial gym, which has resulted in constant noise and disruptions as early as 5am till 12 o'clock mid-nights. Additionally, the building has ongoing pipe and HVAC construction issues, leading to severe flooding that has made living here increasingly untenable. Unfortunately, I discovered too late that my renter's insurance does not cover flood damages, which has compelled me to seek alternative housing.

HPD Housing Connect Lottery can do a better job with respect to their selection of set aside affordable apartments. Many times, some of the set aside apartments are NOT the very best quality. For example: There are many imperfections such as fixtures, the quality of stoves, refrigerators, or the apartment is cut-up so small it can barely fit a bed or furniture inside. They try to steer us into apartments located on super high floors. The bedrooms are the size of jail cells. Often many times what is advertised in Housing Connect is not the same quality apartment a lottery or section-8 applicant will receive.

This experience has highlighted the unjust barriers we face as Section 8 voucher holders. Source of Income discrimination manifests not only in overt statements, such as "no vouchers accepted," but also through more insidious practices like restrictive credit scores and income requirements that effectively exclude us from many "safe affordable quality" rental opportunities. **Additionally, we also need City Council to extend and protect "RTC" Right To Counsel.**

The **six bills introduced to end SOI discrimination** are a crucial step toward ensuring that all individuals have equal access to housing, regardless of how their rent is paid. These measures aim to impose real financial consequences on landlords who engage in discriminatory practices, including:

- **Intro 1212: Banning credit checks and minimum income requirements for voucher holders will prevent subtle forms of discrimination that disproportionately affect us.**
- **Intro 1211: Increasing fines for housing discrimination will provide stronger deterrents against landlords who do not comply with fair housing practices.**
- **Intro 1214: Publicly listing SOI discrimination findings will empower tenants with knowledge of landlords' histories, enabling better-informed housing decisions.**
- **Intro 1215: Creating standards for transparency in tenant screening will ensure that applicants are made aware of the criteria being utilized, leading to greater accountability.**
- **Intro 1210: Increasing fines for violations of the NY City Commission on Human Rights orders will send a clear message that discrimination will not be tolerated.**

As a member of this community, I strongly urge you to support the End Source of Income Discrimination Bill Package. Increase and expand our CCHR agency by increasing their funding and their ability to increase and expand their work force, (Social Workers, Investigators, Lawyers). It is time for us to break down the barriers that keep many deserving families, including mine, from securing stable and safe housing.

Thank you for your attention to this critical issue.

Guardian Ad Litem Ms. Yolanda Allison (she/her/hers/madam)

[REDACTED]

Brooklyn, NY 11238

[REDACTED]

Christopher Leon Johnson

Brooklyn NY 11213

10/5/25

Hello my name is Christopher Leon Johnson and I am giving this written testimony because I was not able to testify virtually or in person due to myself and David rim getting at Curtis sliwa or tell him to drop out from mayors race. The reason there's a lot of housing discrimination in the city is because of the fact that many landlords does not want section 8 tenants or any tenants that that will to pay less than market rate rent in their in their units now the issue is that there are many great tenants that pay less than market rate but the landlords they don't want to take the risk of taking no tenants in because it's hard to get them out and especially when there's a lot of city council members in the body that will do anything to protect those tenants because we start finding out is that those same tenants are made ones that hold all the votes the city council need to start finding a way to really protect the section 8 tenants that are not really political The city council needs to find a way to part ways with the housing justice for all or how tenant block and why and why because the fact that those people act like they fight for us but all they do is fight for developers by making good tenants look bad and the developers and especially r e b n y makes that case of of the reason for displacement. There is racism in housing selections but when you keep on meeting with those non-profits that do nothing for the rest stabilized tenants. It sets everybody back. I support actually supporting real tenants that do the right thing now I want to bring this up about 248 Arlington. The tenants over there are going through a lot of hell and the council member as Sandra nurse or Sandy nurse has done nothing about it she acts like she takes all the money under the table with the way she acts she acts really demonic when she is confronted about two for eight Arlington and that situation. I spoke to the organizer Chief organizer of East York community Land trust and I found out that they are really innocent to the situation I have a big feeling that Sandra nurse or Sandy nurse is complicit and making sure that those tenants go through hell she is the main one that will be on the pulpit crying about tenant discrimination and tenant racism be a landlord's but she acts like the same landlords that oppresses good tenants to line their pockets up Sandra nurse acts like she knows it all and she uses her chief of staff s a m o u r i. t o u r e and her a community liaison Dominique Alexandre to do a dirty work and carry her and Carry her water and make sure that the tenants are at 248 Arlington are oppressed. I am calling on an investigation into Sandra nurse AKA Sandy nurse for her actions towards the tenants of 248 Arlington in Brooklyn New York because the way she acts is like she murdered somebody and know people know that she and she know that everybody knows she did it and she doing and she doing what she got to do to make sure that the truth does not get exposed. I have many proof of Sandra nurse doing that type of actions when it comes to 248 Arlington. We're talking about tenant discrimination here Sandy nurses the biggest tenant discriminator in the city council and if she think I'm lying and anybody thinks I'm lying ask her about 2:48 Arlington in Brooklyn New York which is our district in the 54th state assembly district in the 37th city council district and a 18 State sanitorial district and you'll see why. There is nothing slanderous about the truth Sandy nurses the biggest tenant discriminator in the city council and she want to prove me prove me wrong then she's a address what's up with the broken window and the broken door at 2: 48. Arlington. And Sandy nurse should

address about why community Land trust will not be popular because of her. they're great people that do community land trust in the city but the actions of Sandy nurse are cheaper staff s a m o u r i and her community liaison Dominique alexandre gives me no hope of the reason why community Land trust should be implementing the city council. So when it comes to tenant discrimination and landlord racism. sandy nurse is the biggest one. Thank you God bless enjoy your weekend.

Sincerely

Christopher Leon Johnson 10/5/25

Committee on Civil and Human Rights
Oversight Hearing on Housing Discrimination and Inequity
Testimony by Malahaika Isreal
October 6th, 2025

Greetings to the honorable members of City Council and the Chair of the Committee on Civil and Human Rights, Councilmember Dr. Nantasha Williams, for holding this meeting to discuss housing discrimination and inequity that's plaguing New Yorkers using housing vouchers to be permanently housed. My name is Malahaika Israel. I am a member of Neighbors Together, a City employee, a Mother, and a native New Yorker. I am submitting my testimony to share my experience with housing discrimination.

I was evicted from my apartment and was gainfully employed by the City this year. I'm currently couch surfing and apartment searching, and nothing has changed. I'm constantly on Streeteasy, Trulia, Zillow, Housing Connect, seeking apartments listed for rent that are out of reach for CityFheps voucher holders like myself. It's depressing to see the mayor holding press conferences for the City of Yes Housing Opportunity and cutting ribbons for newly developed apartments ready to rent. Still, I'm not getting the success story of getting housed by the new housing initiatives. I've been working with Neighbors Together to assist with documenting the source of income discrimination, but nothing substantive has no results. During my housing search, real estate agents constantly ghost me, over and over again asking about my income and credit check for me to see the apartment without the credit check they will ghost me and when I do, give him or her a credit check they won't follow up whenever I mention a voucher, and asking when they will get paid when I'm only inquiring to view the apartment, not during the application stage.

Income discrimination is an injustice to individuals and families who seek housing using a voucher to secure stability and a home that is their sanctuary. The New York Commission on Human Rights (CCHR) **SOI** Unit provides tools for voucher holders to hold bad actors accountable. Litigation and pre-complaint interventions help voucher holders access a home more quickly through negotiations with the discriminating landlord and other discriminating parties. [Unlock NYC 2024](#). Denial tactics report found that landlords with substantial real estate portfolios are the highest source of income discriminators. Therefore, the City Council must be committed to continuing to fight and enforce the source of income discrimination by passing:

- **[Intro 1210](#): Increases fines for violations of the New York City Commission on Human Rights orders**

This bill will increase penalties for landlords and brokers violating an order from the City Commission on Human Rights.

- **[Intro 1211](#): Increases fines for discrimination in housing**

Increases civil penalties for unlawful discriminatory practices, harassment, and violence.

Fines will increase to match the landlord's portfolio size, so that there are real financial disincentives for discriminating.

- **[Intro 1212](#): Bans credit checks and minimum income requirements for voucher holders**

Bans credit history and minimum income requirements for voucher holders and anyone in their household. This bill will help prevent a more subtle source of income discrimination and remove the systemic bias of credit history as a barrier for voucher holders.

- **[Intro 1213](#): Adds SOI to the Certificate of No Harassment Program**

SOI discrimination will be considered harassment in the Certificate of No Harassment Program. The Program prevents owners found guilty of harassment from obtaining permits to alter or demolish the building. To address the harassment finding, it potentially requires the owner to construct a certain percentage of low-income housing units.

- **[Intro 1214](#): Publicly lists SOI discrimination findings**

Landlords who discriminate against prospective or current tenants will have the findings of discrimination listed on a publicly available website. This will help inform prospective and current tenants of the history of SOI discrimination so that they can make informed choices when searching for housing and are better prepared to document potential discrimination.

- **[Intro 1215](#): Creates standards for transparency in tenant screening criteria**

This bill will require written notification of the screening criteria for selecting a tenant to all prospective tenants applying for an apartment. When tenants are rejected from an apartment, the landlord must explain in writing within three business days why the tenant was not selected.

More vigorous enforcement means having empathy for vulnerable communities facing housing inequity. Thank you to the Committee on Civil and Human Rights for listening to impacted individuals' feedback on the challenges and the continuity of housing discrimination that voucher holders face, and thanks Councilmember Dr. Natasha Williams signing on to the Source of Income Enforcement bill package. I look forward to other council members signing and getting these bills passed by the end of the year. Passing these bills signifies that our elected officials are committed to supporting the needs of people of New York City in seeking justice for housing discrimination by passing bills **Intro 1210-1215**.

Sincerely,

Malahaika Isreal

As a Matter of Opinion: "The Things I Saw After Testimony: A Brief Observation of Race, Aging and Crime in New York City"

Written By: Orissa Denny, Lobbyist

Race, in its distinction within definition, has always been and will henceforth become the rightful truth of the City of New York. It upholds, it justifies, and it justifies. However, in this manner it has now worked to be the redoing and the undoing of the justice that was the city. There was a time in which a spirit could yield a blow of words to rival any decadent political party on its staunch rhetoric; to wield the thresh of policing and spare the leverage of the freedom. Such was the spirit of a New Yorker. The new reality is New York has died a silent a coldly medicated death. The poverty, treated. The spirit, reviled. No cries of justice, or for and in the matter, and no soul left to tell it. What happened after? That silent crime wave swept the city; a thing I saw after testimony. Cries that echoed "The Boy who Cried Wolf", accused of the end as the chicken to the little, and then the theft of life, safety, and property. The damages, unseen. Race. That once beautiful thing has and will become the scorn. Migrants with a brown or black face too swarm, and yield not. The distaste is rightful. Where and to which place were they welcomed. None were welcomed and the tide was creased in 1996. A solemn justice for the thing that can call itself holy and righteous in the land. However, it was the young and older outsourced workers that swept the tide. A fiscal death, but when denominated by race it led to a much harder consequence. Monetary loss. No one in New York is safe from a thing that minimally understands how to wager blame in race.

There was another thing I saw after testimony. Aging is the mind's inability to quickly relegate what was now versus what was then, but in tax law. It can happen as young as one's thirties. To this effect, those who have not aged gracefully are most vulnerable to theft at the hands of a trusted loved one. So keep the TVs on, tell Miss Mildred and her cat who and what is distasteful, because in the end it will be her disdain that counts the most.

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☐ in favor ☐ in opposition

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Name: JOANN KAMUF WARD

Address: Deputy Commissioner, Policy + External Affairs

I represent: NYC Commission of Human Rights

Address: _____

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Name: Kevin Farley

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I represent: CCHR

Address: _____

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Name: Muhammad Musah

Address: _____

I represent: African Communities Together

Address: (ACT)

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Name: Airenakhue B. Omoragbon

Address: _____

I represent: African Communities Together

Address: (ACT)

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Address: _____

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Address: (ACT)

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Name: ~~Robert Desir~~ Robert Desir

Address: _____

I represent: Legal Aid Society

Address: _____

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Name: Jeremiah Schlotman

Address: 40 Worth St., Ste. 606, NY, NY 10013

I represent: Legal Services NYC

Address: Same as above

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Date: 3/10/2025

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Name: Wanda Isobere

Address: 2273 Tiebout Ave

I represent: Africa Come Together

Address: _____

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Date: 10/3/25

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Name: ARTHUR SCHWARTZ

Address: [REDACTED] NY 10018

I represent: Center For The Independence of the U.S., Inc., NY

Address: 1010 Sixth Ave, NY 10018

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Name: Anthony Feliciano

Address: _____

I represent: Housing Work - UP

Address: _____

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Date: _____

(PLEASE PRINT)

Name: Barbara M. M. M.

Address: [REDACTED]

I represent: _____

Address: _____

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