Commission On
Human Rights

New York City Commission on Human Rights

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Joint Testimony of CCHR and HPD
Before the Committee on Housing and Buildings
December 2, 2025

Good morning Chair Sanchez and members of the Committee on Housing and Buildings. I am JoAnn Kamuf Ward, Deputy Commissioner of Policy and External Affairs at the New York City Commission on Human Rights (Commission or CCHR), and I will be delivering joint agency testimony. With me today from CCHR is Hillary Scrivani, Director of Policy and Adjudications. I am also joined by Lucy Joffe, the Deputy Commissioner for Policy & Strategy and Neil Reilly, Assistant Commissioner for Housing Equity at the New York City Department of Housing Preservation and Development (HPD).

The City is committed to ensuring that every New Yorker has an opportunity address discrimination they experience. In 2020, and again in 2025, the City released *Where We Live NYC* (WWL). Where We Live 2025 (WWL2025) is a five-year fair housing plan that sets out goals, strategies, and commitments to combat housing discrimination and expand housing opportunity across New York City. Goal 1 in WWL2025 is to "Fight discrimination and ensure equal access to housing." This includes commitments for multiple agencies to work together in order to:

- Expand capacity to address allegations of housing discrimination, with particular attention to source-of-income discrimination, and reasonable accommodation requests, including through community partnerships;
- Create and implement a strategic education campaign to inform housing providers and housing seekers about the New York City Fair Chance Housing Law;
- Educate New Yorkers about their right to be free from discrimination in housing sales, educate housing providers about their obligations under fair housing laws, and specifically recognizes the issue of coop discrimination.

Although CCHR and HPD have limited roles in private market transactions such as co-op purchases, our agencies welcome the opportunity to speak with you today about the City's housing market and ongoing work to prevent and address housing discrimination.

As HPD has discussed with this Committee, the City's rental market has long been in a state of housing emergency and across all housing types is experiencing extremely low vacancy rates. WWL2025 notes that limited vacancy can intensify discriminatory practices.

Cooperatives or "co-ops" are one of multiple types of homeownership in New York City. Owners buy shares in the co-op, which functions much like a corporation, and become shareholders in the corporation. The New York State Attorney General regulates the formation and many of the processes involved in operating co-ops.

Co-op members generally elect a board of directors who are charged with ensuring the co-op remains financially stable, resolving conflicts, and overseeing operations. The process of buying into a co-op is unique from other types of housing and increasing transparency in decision-making has long been a policy focus to address a range of concerns, including but not limited to, rooting out discrimination.

When a prospective co-op purchaser believes they have experienced discrimination in the buying process, they have multiple potential avenues for pursuing a remedy. New York City and state laws prohibit discrimination in rental and sales. And individuals who believe they have experienced discrimination can seek redress for discrimination through anti-discrimination agencies, such as the Commission on Human Rights and the NY State Division of Human Rights, as well as in courts.

The Commission has actively worked to raise awareness about the wide range of protections in housing, including the newly enacted Fair Chance Housing Act, as well as disability protections through innovative collaborations and partnerships to reach New Yorkers outside of traditional media channels.

Turning to the bills, I will focus on Intro 407-A.

Intro 407-A amends Title 8 of the Administrative Code, which houses civil rights protections. This bill would add a new chapter, which regulates how and when housing cooperatives communicate with prospective purchasers when they are denying a sale. This includes mandating a statement of all of the reasons that an applicant's offer is not accepted. The bill also creates a private right of action for failing to comply with these requirements and authorizes the Commission to address claims related to timelines, disclosures, and other procedural requirements related to sales, and to evaluate all of the potential reasons a sale may have been denied.

Intro 438 and 1120-A amend Title 26. The former would require cooperative housing corporations to provide approved purchasers with financial information within 14 days of the request. The latter establishes standardized procedures for cooperative apartment boards, requiring co-op boards to provide a complete application package upon request to applicants, and setting timeframes to acknowledge receipt of submitted materials, identify deficiencies, and issue a final decision.

The City supports Council's goals of tackling discrimination, and strengthening transparency and predictability in the co-op application process.

While neither agency plays a direct role in regulating these transactions, we look forward to sharing our collective expertise in discrimination enforcement and the housing market to help inform how these pieces of legislation can best achieve our collective policy goals.

Our agencies look forward to hearing stakeholder input in order to ensure that the pieces of legislation balance stakeholder interests and achieve Council's objectives of eliminating discrimination.

The City welcomes the opportunity to work with Council on these important matters.

City of New York
DEPARTMENT OF
HOUSING PRESERVATION AND DEVELOPMENT
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nyc.gov/hpd

Testimony of the New York City Department of Housing Preservation and Development to the New York City Council Committee on Housing and Buildings

Tuesday, December 2, 2025

Good morning, Chair Sanchez and members of the New York City Council Committee on Housing and Buildings. My name is Michael Sandler, the Associate Commissioner for Neighborhood Strategies at HPD, and I am joined by my colleague, Lucy Joffe, Deputy Commissioner of Policy and Strategy. We are also joined by Elizabeth Suarez, Director of Architecture at DOB, for questions. Thank you for the opportunity to testify here today.

In 2020, and again this year, HPD affirmed its commitment to fair housing through *Where We Live NYC*, a plan to expand housing opportunity and choice for all New Yorkers. In order to advance this commitment, we are looking both to innovative ideas and to draw on lessons from the past. Shared housing represents an opportunity to reimagine a historic housing model for the 21st century.

Shared housing – two or more privately leased bedrooms with shared kitchens, bathrooms, and living spaces – has a long history in New York City. By the first half of the 20th century, shared models, such as boarding houses and single room occupancy hotels, constituted a substantial and affordable part of New York City's housing stock. They served a wide range of households from immigrants newly arrived on the city's shores and young people flocking to the city for factory jobs to New Yorkers looking for a short-term place to stay as they navigated life changes. However, policies implemented in the mid-20th century – intended to improve housing quality – led to a prohibition on the construction of new shared housing and a sharp reduction in the existing stock. The loss of this stock coincided with the rise of street homelessness. In the 1980s, realizing the role the model played in housing New Yorkers, the City tried to reverse course and stop the wholesale conversion of shared housing, but the damage was already done, and the SRO stock was significantly diminished.

The impacts of these policies reverberate across the city today. Per the American Community Survey, between 2013 and 2023, the number of small households increased 11.1%, while the growth in the city's small unit-sized stock failed to keep pace, growing only 7.5% during the same period. While it is clear that New York City needs housing across all types and household sizes, a growing number of single adults are taking on roommates to mitigate high housing costs and the lack of affordable housing for single persons. This trend puts additional pressure on the city's existing stock of larger homes, as single persons pooling multiple incomes outcompete one- or two-income families. Increasingly, roommate shares have been commercialized, and landlords are renting individual rooms in illegally converted apartments, compromising tenant safety by violating fire safety and egress rules and blocking access to light and air. A burgeoning unregulated market of co-living shows that there is demand for this type of housing in New York City at a variety of price points.

Reintroducing purpose-built shared housing models provides a new set of tools to expand housing opportunity and choice to the growing population of single New Yorkers. Intro 1475 will establish clear design, occupancy, and safety standards to promote harmonious living, with more kitchens and bathrooms than historically required for SROs to mitigate conflict and increase privacy and fire safety standards that meet or exceed those of traditional apartment buildings. New shared housing will be built based on new regulations which ensure effective tenant protections and high quality and safety standards.

On November 25th, HPD released New York City's *Shared Housing Roadmap,* which lays out a path for reintroducing shared housing. The *Roadmap* builds on lessons learned from past shared housing models and recent efforts to expand housing options and opportunities for New Yorkers. In 2018, HPD launched the ShareNYC pilot program to explore potential shared housing models on three sites across the city. In the course of developing these projects, we encountered myriad zoning, code and policy challenges that slowed development and raised costs without improving quality of life. *Where We Live NYC's* commitment to facilitate equitable housing development bolstered HPD's efforts to overcome barriers to shared housing. The passage of *City of Yes for Housing Opportunity* in December 2024 removed zoning barriers identified in the *Roadmap.* Today, Intro 1475, sponsored by Councilmember Erik Bottcher, advances the *Roadmap's* legislative strategies, to allow as-of-right construction of new shared housing and introduces code changes governing its design, occupancy, and safety.

The *Shared Housing Roadmap* and the strategies it lays out are the result of careful research, analysis, and testing over nearly a decade. Research into the legislative history of shared housing provided a strong foundation for understanding the strengths of historic models and the operational pitfalls to avoid. Conversations with shared housing tenants, nonprofit and for-profit co-living operators, policy experts, and other municipalities implementing shared housing models provided context on modern-day operations and best practices. Collaboration with other

agencies, including the Department of Buildings, the Department of City Planning, and the Fire Department, as well as partners like the Administration for Children's Services and the Mayor's Office of Criminal Justice ensured a comprehensive, multi-sectoral approach that examined the model from a variety of perspectives. Lessons learned from the implementation of other new housing typologies, like Accessory Dwelling Units (ADUs), informed our legislative approach. Taken together, these efforts chart a path to enable shared housing that ensures robust design, management, and tenant protections.

As New York City continues to grapple with growing housing demand, rising rents, and high construction costs, shared housing opens up new opportunities. In central areas where office-to-residential conversion opportunities are abundant, shared housing offers the potential to not only create more units within a large office floorplate, but to also develop less costly conversions by clustering bathrooms and kitchens around pre-existing, centrally located plumbing networks. Shared housing can also increase tenant protections for thousands of renters by providing them a housing option with separate and independent relationship with their landlords through individual leases and Good Cause Eviction protections. Shared models can also create opportunities for communal caregiving, shared responsibilities, and light-touch services for households who may be isolated or vulnerable in traditional housing, but who do not need the depth of care provided by supportive housing.

Existing shared housing programs in New York City demonstrate that the model can serve New Yorkers who are seeking a communal lifestyle or who are navigating a transitory phase of life as well. The **Ascendant/Ali Forney Center Share NYC** project, which was approved by the City Council in 2023, provides an opportunity for formerly homeless young adults to learn life skills for independent living, while sharing costs and responsibilities with fellow residents and maintaining a support system through communal living arrangements. The **Neighborhood Coalition for Shelter's Scholars Program** provides unhoused CUNY students with stable, year-round housing and educational supports to see them through to graduation. The **New York Foundling's Mother and Child Program** supports caregiving by providing shared housing for new mothers, who are themselves young adults in foster care, where they can finish school, find employment, and learn how to care for their children. The **International House** in Harlem provides a first home for students and young professionals from abroad who do not have credit scores or other resources necessary to access housing on the private market and offers opportunities for new arrivals to settle into a purpose-built community.

While these models demonstrate the possibilities that shared housing can offer, we want to be clear that this model is not the right fit for everyone. Heeding the expertise from the supportive housing community, HPD has determined that shared housing is not the right fit for most supportive housing residents, and, as with all our programs, no one will be forced to live in shared housing that does not meet their needs. Additionally, shared housing is not transitional or

short-term housing; it is class A, permanent housing that is not a substitute or supplement to the shelter system and it will not be permitted to host short-term rentals.

Intro 1475, a collaboration between the City Council, HPD, the Department of Buildings, and the Fire Department, brings the vision for shared housing articulated in the *Shared Housing Roadmap* into reality by proposing amendments to the Housing Maintenance Code, Building Code, and Fire Code.

At a time when vacancy rates are at an all-time low, especially among New York City's lowest-cost apartments, we need to take a multi-pronged approach to the housing crisis. Shared housing is one of many tools HPD is deploying to tackle the crisis. While not the appropriate model for all New Yorkers, shared housing offers a new option for single New Yorkers seeking communal living at an affordable price.

We are grateful for our continued partnership with the Council and our collective efforts to address the shortage of low-cost housing and meet the needs of our diverse residents. We welcome the opportunity to work with the Council to advance this historic legislation and look forward to your questions.

JUMAANE D. WILLIAMS

STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS TO THE NEW YORK CITY COUNCIL COMMITTEE ON HOUSING AND BUILDINGS DECEMBER 2, 2025

Good morning,

My name is Jumaane D. Williams, the Public Advocate for the City of New York. I thank Chair Sanchez and the members of the Committee on Housing and Buildings for holding this hearing today.

Cooperative developments offer an opportunity for homeownership which would otherwise be inaccessible to many New Yorkers. However, a long history of discriminatory practices in this industry, both overt and implicit, have left a gaping loophole in fair housing enforcement. As co-ops are considered businesses, they are bound by corporate law which requires them to act in the best interests of shareholders. The extent of discrimination is difficult to quantify but it is estimated to be a factor in almost a fifth of board decisions with broker agents reporting common code words like "NOK" or "NQ" to indicate "not our kind" or "not quite".[1] Because a potential buyer can wait lengthy periods only to be denied with no explanation, it can be difficult to improve a subsequent application to access co-op ownership after a denial.

To that end I submitted legislation, Intro 407, which would require cooperatives to disclose to rejected applicants the specific reasons their application was denied. If the co-op board turns down an applicant, the applicant should be told the specific reasons for that denial. This transparency would allow applicants to better understand and address any genuine application deficiencies and it would further mitigate discrimination as secrecy surrounding these decisions fosters an environment in which discrimination thrives. Furthermore, with more than 6,800 co-op buildings in New York City, more than any other municipality in the country, eliminating this closed-door system would have a tremendous impact on efforts to make homeownership more equitable and accessible, setting an important precedent.[2] Besides the benefits to individual buyers, this

[1] Solomont, E.B.; O'Regan, Sylvia Varnham. "Inside New York City Co-Op Discrimination." *The Real Deal*. May 17, 2021. https://therealdeal.com/magazine/national-may-2021/not-our-kind/
[2] Ibid.

transparency also makes it harder to discriminate against a candidate whose financial records are good on paper. It cannot prevent every potential instance of discrimination by genuine bad faith actors, but a written explanation requires a more legitimate or at least specific and actionable rationale for denial.

I also want to emphasize and uplift Chair Sanchez' bill, Intro 438, which would require cooperatives to provide financial information to prospective purchasers of cooperative apartments. Together, these bills would equip prospective buyers with crucial information, moving us one step closer to eliminating a longstanding asymmetry of information. Creating more transparency to the entire application process is critical as we encourage homeownership in our city.

I want to thank Chair Sanchez' team, as well as members of my own Policy team, for working together on getting these bills to this point. I also want to thank Craig Gurian, who has worked tirelessly with my team to build a coalition around this legislation. I hope to see them both pass this session. Thank you.

OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO
Brooklyn Borough President

City Council Committee Housing and Buildings
Oversight – Co-op Transparency (Intro. 407-a)
December 2, 2025

Good morning Chair Sanchez and members of the committee and thank you for holding this hearing today. I am here representing Brooklyn Borough President Antonio Reynoso.

Our office's *2025 Comprehensive Plan for Brooklyn* focuses one of its four frameworks on "Housing Growth and Housing Choice," with strategies outlined to further fair housing, support growth in priority areas, and increase housing options for individuals and families of various sizes, incomes, and preferences. The Plan states: "where Brooklynites live shapes their access to opportunity; their connection to community anchors, employment and transit options (including time spent commuting); their health outcomes and risks; and distance to everyday needs such as schools, parks, and grocery stores."

Unfortunately, discrimination remains one of the major barriers to housing choice, and the city's co-op apartments are no exception. There are about 450,000 occupied units in co-op buildings in NYC, according to the NYC Comptroller. They are inhabited by a mix of owners and renters, with all owners and some renters needing board approval to live there. The law prevents these boards from discriminating against protected classes; however, because boards are not required to give applicants a reason for rejection, proving discrimination generally requires an expensive and time-consuming lawsuit, meaning boards are rarely held accountable. As *The Guardian* put it in 2022, "the secrecy allows for discrimination with impunity."

As the federal government threatens to roll back fair housing protections and scales back enforcement, we must step up our efforts in the city. Intro 407-a does this by requiring boards to share their reasons for rejecting applicants, ensuring that they will issue decisions based on legal reasons only, or be subject to penalties for non-disclosure.

We also need to ensure that the City Commission on Human Rights (CCHR) is sufficiently funded to enforce discrimination claims when they do arise. According to the latest Mayor's Management Report (MMR), inquires to CCHR describing potential violations of all types increased 14% in the last year (the largest increase on record), and the average age of their complaint caseload is 614 days – over a year-and-a-half – yet staffing levels have not increased accordingly. The City Council must address this in the FY 2027 budget.

Thank you again for this hearing today, and to Public Advocate Jumaane Williams for proposing Intro 407-a. Borough President Reynoso encourages the Council to move quickly to pass this bill before the end of the term.

AIA New York

NYC Council Housing and Buildings Committee
City Hall
New York, NY 10007

December 5, 2025

RE: AIA New York Chapter Testimony to the City Council Committee on Housing and Buildings on Int 1475-2025

Dear Chair Sanchez and Members of the Housing and Buildings Committee,

American Institute of Architects New York Chapter (AIANY) writes to express our support for Intro 1475-2025, a bill to permit the creation of shared housing rooming units in new or converted class A multiple dwellings. AIANY represents more than 5,000 architects and design professionals committed to positively impacting the physical and social qualities of our city.

The housing and affordability crises in New York City demand bold action and reimagined solutions. A thoughtful, managed legalization of smaller housing units with shared kitchens and bathrooms create opportunities to build a suite of diverse housing typologies to meet the evolving demands of our society.

Several studies have identified the direct correlation between an increase in homelessness and a decrease in shared housing, or SROs. This housing typology serves as a useful piece of the puzzle to solve the City's housing crisis.

Additionally, this bill will unlock an important tool for office-to-residential conversion projects, providing more flexibility for the number of housing units able to be delivered within the limits of the building envelope.

It is important for the regulations of our city to adapt to the changing demands of our society to accommodate a variety of spatial needs. The changing demographics and affordability crisis call for a more flexible, collaborative, and collective approach to housing development.

Thank you for your consideration.

Sincerely,

Jesse Lazar
Executive Director
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Hello Council Members. Thank you for including my testimony in support of shared housing solutions

My name is Lara Gerstein and I am the mother of a 19 year old with an Intellectual Disability. I have banded together with other parents of young adults with disabilities from Queens, The Bronx, Brooklyn and Manhattan to create a not-for-profit called CHInyc. The Collaborative for Housing Independence. Our goal is to create a pilot project – a replicable model of a supportive inclusive community where our adult children can live and thrive as neighbors of other New Yorkers, as we all do. Safe, affordable and accessible shared housing would allow them to live with dignity and independence with on site support and a community who cares.

At CHInyc, we have spent the last year and a half talking to everyone who will listen about our needs in order to formulate a plan. We've spoken to agencies that serve disabled New Yorkers, we've spoken to people in some of your offices, real estate specialists and some who work in affordable housing. The first 10 people we spoke to said, "great idea, do it upstate", but we said no. NYC is our home. Our kids are city kids. They will never drive cars, but can use public transportation. They navigate city streets, know their neighbors and business people in their neighborhoods. And those people know them. Our young people with disabilities are natural creators of community. And being known in a community, rather than living apart from it (in an isolated group home), can keep them safe.

But including people with disabilities in their communities is new. This population was kept in the shadows for generations. It is only in recent years that there has been an effort to integrate them back into our families and into our communities where they naturally belong. For adults with disabilities, that effort seems to be solely focused on people with very minimal support needs. Our kids attended public schools and have Self Direction services and are currently well supported in their schools and in the community their families provide for them. But when they turn 21, their support depends solely on family members.

Family support works for a while but parents age and eventually die. And even disabled people with support needs want increased independence as they mature. Group homes in NYC are closing and are frankly often unsafe. Many are not wheelchair accessible and the only options for people with medical needs (called ICFs) are very restrictive and are also closing. Supportive, inclusive housing exists for many populations but not yet for ours. It's time to make this possible.

I am here to represent families from all over New York City who have, or will soon have adult children with disabilities who need creative housing solutions in order to continue to live in NYC. People with disabilities make up a large portion of the homeless population in NYC. They are much more likely to become homeless at an older age when they have spent their lives in the care of a parent who dies without a solution for their adult child who may be in their 50's or 60's.

My grandparents were original residents of Penn South, where I grew up and where family and friends still live. In the 1970's, my parents bought a building with other artists to form a coop in the garment district, where I have lived for the past 25 years. I have deep roots in NYC and have seen first hand how creative, people-centered housing solutions can create stable communities. As a parent of a disabled child, I want nothing more than a safe, stable housing situation for my child, especially once I am no longer around.

The current housing and support systems for adults with disabilities in NYC are not working and it is time to explore new options. We believe that safe, affordable, accessible and plentiful shared housing can offer solutions to people in many groups, including those with disabilities.

Thank you for your time.

Lara Gerstein
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Testimony on Co-op Transparency

12/2/2025

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. CIDNY supports the "Coop Transparency Legislation" which includes Intro 407, Intro 438, and Intro 1120 all of 2024.

People with disabilities face some of the most severe housing challenges in our city. They have the largest share of fair housing complaints: about 52 and 54% of complaints, according to the National Fair Housing Alliance (NFHA). Among the complaints that are received we have learnt that numerous complaints are related to the lack of transparency in the decisions of co-op Boards.

With Respect to Intro 438

Very often left out in bills like this, which promote greater transparency, is a requirement that documents be presented to potential buyers who have reading disabilities, or who are blind, in a manner which allows review. With today's technology, documents, when needed, can be converted into formats which allow people who are blind, or who have other visual impairments, to read a document. That should be included in the Bill.

Transparency in Application Decision- Intro 407

CIDNY strongly supports Intro 407 of 2024: This bill would require cooperative corporations to provide prospective purchasers with a written statement of each and all of its reasons for withholding consent to a sale within five days after deciding to withhold such consent.

Coop Boards are not currently required to provide written explanations when they reject an applicant. This lack of transparency has created an environment where implicit and intentional bias can go unchecked. Applicants are often left confused, financially harmed and unable to appeal or challenge unfair determinations.

Although much concern is expressed about race and national origin considerations, disability discrimination in housing is, according to the NYC Commission on Human Rights, the most frequently complained about form of

housing discrimination. Although often the focus is accessibility, we believe that co-op boards are likely looking at disabled applicants as a source of future expense to address access issues. That is why our foundation, which serviced over 70,000 people with disabilities over the past year, strongly support transparency in the selection of coop applications to ensure a fair housing system in NYC.
Thank you,

Mbacke Thiam He/Him/His
Housing, Health & CAN Community Organizer
Center for Independence of the Disabled, NY (CIDNY

Testimony before the City Council Committee on Housing and Buildings

Intro 1475-2025

A Local Law to amend the administrative code of the city of New York, the New York city building code, and the New York city fire code, in relation to shared housing

December 2, 2025

Good morning, Chair and members of the Committee. I'm Grace Rauh, Executive Director of Citizens Union, which is now home to the 5BORO Institute, our policy think tank focused on solving New York City's affordability crisis.

I'm here today to speak in support of Council Member Erik Bottcher's legislation and HPD's Shared Housing Roadmap. Together, they represent one of the smartest and most cost-effective strategies we have to expand housing options for New Yorkers.

We all know the problem: New York does not have enough housing or enough affordable housing. Additionally, we are simply not building the kinds of homes people actually need.

With millions of square feet of office space sitting empty and hundreds of thousands of new residences needed, now is the time to innovate and embrace new approaches to housing.

At 5BORO, we've been calling for this shift. Two years ago, we released our Flexible Co-Living report, urging the City to legalize modern dorm-style units with shared kitchens and baths, and make office-to-residential conversions affordable by embracing shared layouts. These ideas are now reflected in HPD's roadmap, and Council Member Bottcher's bill is the essential step to bring them to life.

Due to the design and layout flexibility, this model has the potential to add twice as many housing units to the market compared to a traditional residential conversion of an office. This housing model also lowers construction costs by maximizing adherence with the original office layout and plumbing infrastructure. The conversion of offices to Flexible Co-Living is estimated to cost approximately half of the $300-$500 per square foot typically spent to convert offices to traditional apartments.

Flexible Co-Living can provide an ideal housing alternative to the many New Yorkers and newcomers who split multi-bedroom units with roommates to keep housing costs affordable. This could reduce the competition for multi-bedroom homes and leave them open to the families who need them.

Shared housing directly responds to the housing challenges facing our city. HPD's Roadmap makes the case clearly: when done right, shared housing is safe, well-regulated, cost-efficient, and deeply aligned with how people are already living.

This legislation will create clear, modern standards for shared housing. It also promises to unlock conversion opportunities in vacant or underutilized office buildings that simply will not pencil out as traditional apartments or only at a very steep cost.

We are in a historic housing shortage. We need every tool available. Shared housing is one of the most immediately actionable and cost-effective solutions we have.

I urge the Council to pass this legislation quickly so New Yorkers can start benefiting from this new supply.

Thank you.

Testimony before the NYC Council Committee on Housing and Buildings
Yvonne Peña
December 2, 2025

Thank you to Chairperson Sanchez and the New York City Council's Committee on Housing and Buildings for the opportunity to testify today. My name is Yvonne Peña, and I am a policy analyst at the Community Service Society of New York (CSS), a nonprofit organization that promotes economic opportunity for all New Yorkers. CSS has worked with and for New Yorkers since 1843 to promote economic opportunity and champion an equitable city and state.

As you know, housing is top of mind for New Yorkers. While our city is often described as a city of renters, many New Yorkers also aspire to homeownership. And for some, co-ops are a crucial pathway to achieving that goal.

There are a wide range of co-ops throughout the city, with about half outside Manhattan; many house middle-class New Yorkers; and some assisted co-ops are designed to be affordable for working-class

households. For people who are often priced out of New York City's expensive real estate market, co-ops can offer a meaningful opportunity to build equity and establish long-term roots in their communities.

We also know that housing segregation in New York has been driven both by structural factors—such as where New York has historically built subsidized housing—and by acts of discrimination throughout the housing market. According to Comptroller Lander's 2023 report, *The Racial Wealth Gap in New York*, "Black New York City residents are 30 percent less likely to own a home than white New York City residents."[1] In 2022, NYU Furman Center's analysis of homeownership across New York City found that while there was a slight uptick in homeownership rates, Black and Hispanic households still had the lowest rates of homeownership.[2]

An equitable city can have no room for discrimination, including in neighborhoods and buildings that have traditionally been privileged and exclusionary. Intro 407 helps address this by ensuring that co-op boards provide prospective buyers with the reason for any denial—giving

[1] Office of the New York City Comptroller Brad Lander (2023). The Racial Wealth Gap in New York. Available at: https://comptroller.nyc.gov/wp-content/uploads/documents/The-Racial-Wealth-Gap-in-New-York.pdf, page 9.
[2] NYU Furman Center (2022). State of Homeowners and Their Homes. Available at: https://furmancenter.org/stateofthecity/view/state-of-homeowners-and-their-homes.

applicants assurance that decisions are being made lawfully and not because of discrimination.

Three of our suburban neighbors—Westchester, Nassau, and Suffolk counties—have already adopted versions of co-op disclosure. New York City, a city that prides itself on progressive values, should have been at the forefront of co-op disclosure.

Intro 407—which public opinion polls show is overwhelmingly supported by New Yorkers—is a truly "light touch" measure. It requires no reporting to any government agency; makes no changes to co-op procedures; and does not alter the legal reasons a co-op may lawfully deny an applicant. As prospective buyers must be transparent about their financial and personal histories, co-op boards should be required to do the same when denying someone the chance at homeownership. If a co-op rejects my application, I should be entitled to know why.

For decades, the Equal Credit Reporting Act and implementing regulations[3] have required credit providers to give specific reasons to anyone denied

3 See 15 U.S.C. § 1691(d) and 12 C.F.R. § 1002.9(b).

credit. That is, credit denials—regardless of importance—have long come with disclosure, yet co-op boards can block the sale of a home that both a shareholder has agreed to sell to you *and* a lending institution has agreed to lend you money for, without providing any explanation.

Like many industries that resist effective civil rights protections, the co-op industry wants to keep their denial reasons secret. Their preference for opacity should not outweigh New Yorkers' right to fair and transparent access to homeownership. Central to CSS's mission is promoting economic security for everyday New Yorkers. Ensuring fair access to co-ops gives more working- and middle-class New Yorkers a meaningful chance to build wealth and stability. The Community Service Society strongly urges City Council to pass Intro 407.

Council of New York Cooperatives & Condominiums
INFORMATION, EDUCATION AND ADVOCACY

850 7th Avenue • Suite 1103 • New York, NY 10019-5230

Good morning Council Members Sanchez and members of the Committee.

Thank you for this opportunity to testify in opposition to Intros 407, 438 and 1120.

My name is Mary Ann Rothman and I am the Executive Director of the Council of New York Cooperatives & Condominiums, a membership organization which has for 50 years provided information, education and advocacy to and for New York housing cooperatives and condominiums.

When a house is sold, the seller leaves and the new home owner has the privacy of and the responsibility for their own home. When a cooperative is sold, the seller leaves but the remaining shareholders in the cooperative become the business partners, the neighbors and the colleagues of the in-coming home owner. Protecting the safety and the financial health of the cooperative and its compliance with all applicable laws is the shared responsibility of all the cooperators and specifically that of the Cooperative Board.

In very small buildings literally everyone may have a daily role in maintaining the building. In larger cooperatives much of the actual work is delegated to management, employees, contractors, but the responsibility still remains with the Board to oversee all project. These board members are volunteers, elected by their fellow shareholders. One major responsibility that the board cannot delegate is ensuring to the best of its ability that all incoming shareholders can carry their financial share of cooperative living AND that they will follow the rules and be active participates in the cooperative Community.

We urge you this committee to oppose passage of Intros 407, 430 and 1120-A that seek to control the Admissions process in New York City cooperatives. Cooperatives are an affordable form of home ownership in our very expensive city. Rejections are few – with boards trying their best to accommodate prospective neighbors. Please read my full testimony and the testimony of all those here today in opposition to these bills and ensure that they do not advance.

phone: (212) 496-7400 • e-mail: info@CNYC.coop • website: www.CNYC.coop

Int 407 threatens the very heart of cooperative living, whereby volunteer board members assume the responsibility of protecting the safety, finances and the quality of life of all shareholders in part through a careful, thoughtful admissions process. The bill menaces board members with the threat of perjury for carrying out their fiduciary responsibility and exposes them to unnecessary liability and frivolous lawsuits, undermining their ability to act in the best interest of the cooperative and all its shareholders. It will discourage shareholders from considering board service.

Int 438 requires cooperatives to provide potential purchasers with unverified financial information regarding operating expenses and potential and ongoing capital expenses, attempting to protect potential purchasers at the expense of exposing the cooperative and its current shareholders to unnecessary liability.

And Int 1120-A seeks to impose a one-size fits-all structure on the vast diversity of housing cooperatives in our city. It also asks the impossible, in requiring the cooperative to state that an application is complete before there is time for the Admissions Committee or the board to fully review the submitted material. Very frequently questions arise during the review process, where supplementary information from the applicant can clarify. A further impossible provision would have the applicant 'deemed' admitted if for some miscalculation of timing the allotted days for response elapse. For all the reasons that we have just stated and the many more that you will hear today, it is vital that boards be allowed to continue to give careful consideration to each and every proposed purchaser, receive answers to all questions they raise, and deliberate without threat of lawsuit.

None of these bills will produce the intended result of more transparent admissions and fewer rejections. Quite the contrary. Their passage would add to the cost of cooperative living, would discourage service on the board, thereby eroding cooperative home ownership, and is more likely to inspire admissions rigidity than flexibility, causing boards to reject borderline candidates whom they now try hard to help gain admittance. Please vote down these three dangerous bills.

NYSAFAH
NEW YORK STATE ASSOCIATION FOR AFFORDABLE HOUSING

NYSAFAH Testimony
New York City Council
Committee on Housing and Buildings
December 2, 2025

Thank you, Chairperson Sanchez and Members of the Committee. On behalf of the New York State Association for Affordable Housing (NYSAFAH), we are pleased to offer testimony on Introduction 1475, which would amend the administrative code of the city of New York in relation to shared housing.

For over 25 years, NYSAFAH has represented the for-profit and non-profit developers, organizations and professionals who build, preserve, and finance affordable housing across New York. We come before you today in support of this bill.

Intro 1475 tackles a longstanding and critical shortfall in New York City's available housing types. The decades long decline of legal single room occupancy and shared housing options has exacerbated the affordability crisis, reduced overall supply, and failed to meet the needs of our changing population. This bill represents a necessary and overdue step toward legalizing a safe, modern form of housing that is both efficient and responsive to how many New Yorkers live.

Our support is rooted in what this bill can achieve: it will quickly add to our housing supply by using space more efficiently. It provides a responsible pathway to preserve existing buildings that already operate as shared housing but lack clear legal standing. And it directly serves single adults, young workers, and others who are currently priced out of the studio and one bedroom market and often co-share in larger sized unit types that could better serve families.

We urge the Council to pass this important bill and to work with the development community, city agencies and organizations with experience in this work during the implementation phase. The goal must be to ensure the final rules are workable, financeable, and scalable. By getting the details right, we can unlock a new and necessary form of housing that meets a proven need and helps build a more diverse, equitable, and resilient New York.

Thank you for your leadership on this critical issue.

Respectfully submitted,

***

Irak D. Cehonski-Rivas
Director of Policy – New York City
NYSAFAH
Contact: irak@nysafah.org – [redacted]

New York State Association of REALTORS®, Inc.

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December 2, 2025

NYSAR Testimony in Support of Int. 1120-A

Good morning, Chair Sanchez and members of the New York City Council Committee on Housing & Buildings. My name is Zoila Alonzo, and I am REALTOR® and licensed real estate broker based in Jackson Heights, Queens. I am here to speak on behalf of the New York State Association of REALTORS®, a 60,000-member, statewide real estate trade organization. NYSAR is fully supportive of Intro Number 1120-A by Councilmember Farias, and of the three bills on today's hearing calendar, we believe Intro 1120-A offers the clearest path forward to address the lack of transparency in the process to purchase a coop apartment in New York city.

Countless stories have been told regarding how the lack of a response, and injurious nature of practices by some cooperative housing boards, have harmed potential buyers and sellers in our great city. As a REALTOR®, I have witnessed firsthand how the lack of a requirement for boards to respond to an applicant has harmed New Yorkers. This loophole allows co-op boards that don't want certain people in their building to simply not consider an application, leaving otherwise qualified applicants in the dark indefinitely.

Intro 1120 also better serves consumers, who if lawfully declined, can move on with their housing search. Having a co-op board sit on an application for several months puts homebuyers at a distinct disadvantage as they face potential mortgage rate expiration and loss of application fees.

While NYSAR also supports Intro 407, we are concerned that the lack of a timeline component within, or in conjunction with that legislation, would simply permit unscrupulous boards that wish to illegally discriminate against an applicant, to simply sit on an application. We are supportive of requiring boards to provide a written reason for denial, although we believe Intro 407 is flawed in its current form. And while we agree with Intro 407's intent to combat illegal discrimination, we hope you recognize that imposing fines on coop boards does nothing to provide access to housing.

In conclusion, NYSAR encourages this committee to advance Int. 1120 and seek its passage before the full City Council. I appreciate the opportunity to testify and thank you for holding this important hearing.

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December 2, 2025

New York City Council
Committee on Housing & Buildings
City Hall
New York, New York 10007

Testimony re: Int. No. 1120 (Farias)

The New York State Association of REALTORS®, Inc. (NYSAR) welcomes the opportunity to submit testimony on Int. No. 1120, which would bring much needed transparency and fairness to the cooperative housing purchase process in New York City. Co-op transparency legislation is sorely needed. Int. 1120 represents the best path forward for addressing the loopholes in the co-op sale and purchase process which currently harm buyers and sellers, permit illegal discrimination and unfairly deny housing opportunities to otherwise qualified applicants.

Rationale for Int. 1120
Int. 1120 would add uniformity to the co-op housing purchase process by requiring every co-op board to keep and make available a standardized application and list of requirements. This provision would not require all co-op boards to have the same set of requirements or application throughout New York City, but rather, ensure that applicants for a unit within a given cooperative would be evaluated according to the same set of requirements. Bringing transparency to the at times secretive nature of cooperatives should reduce the time spent by buyers applying to a co-op, while also reducing the time spent by boards reviewing applications from unqualified applicants.

Int. 1120 would also establish reasonable timelines that will bring predictability to the sale and purchase process. In establishing a 45-day window to respond to applications deemed complete, plus a 14-day extension, the bill would rectify the loophole in current law that allows co-op boards to effectively deny applicants by never responding to their applications.

Five counties surrounding New York City currently have timelines for co-op boards to respond to applicants: Suffolk, Nassau, Westchester, Rockland and Dutchess. Suffolk county established the first of these in 2009. While there are differences in these laws, including different remedies for when a co-op board fails to respond to an applicant, they all require that boards adhere to specific deadlines for responding to applicants. **For a co-op transparency law to be effective, it is imperative to include a timeline for responding to applicants.**

Int. 1120 also includes a provision designed to compel co-op boards to respond. If a co-op board does not respond within the allotted 45-day window plus any applicable extensions, the applicant can initiate a process to notify the board that if there is no response within 10 business days, the co-op board will be deemed to have consented to the sale of the unit. The experience of countless REALTORS® and their clients in New York City indicate that absent this provision, co-op boards would not review many applications, either in a timely manner or at all.

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Importantly, Int. 1120 preserves the ability of a co-op board to deny applicants, so long as they are not engaging in illegal discrimination or violating other laws (i.e. – fair housing laws) in doing so. NYSAR's long standing support of and advocacy for co-op transparency laws has never sought to eliminate the discretion of a co-op board to admit or reject applicants. Nor have we sought to subject boards to a flood of litigation. It is a testament to the success of the 5 co-op county laws in New York State that not a single lawsuit has been filed on the basis of a co-op violating those local laws. Those local laws have reformed the co-op purchase process to better serve buyers and sellers, without placing unnecessary or onerous burdens on co-op boards.

Smaller co-op boards – those with less than 10 units – would be exempt from Int. 1120, thus eliminating any potential burden those boards may experience. The bill also exempts those co-ops where the sale of a unit must be approved by a state or city agency, such as Mitchell Lama co-ops or those funded by the Housing Development Finance Corporation. These more affordable co-ops are designed to serve low-moderate income New Yorkers and would not be impacted by this legislation.

Addressing Illegal Discrimination

While not a panacea to illegal discrimination in the co-op housing market, Int. 1120 would prevent boards from discriminating by not responding to an applicant. Over the last few decades, countless articles have been published asserting that some co-op boards discriminate against qualified applicants using this tactic. Int. 1120 is designed to deter these bad actors from engaging in illegal discrimination via the loophole that enables them to not respond to applicants. The combination of transparency in disclosing a board's requirements for determination, along with a requirement to responding within the 45-day window, will add much needed accountability to the sale and purchase process. This accountability will help buyers, who if denied can move on with their lives, and also help sellers, who at times are placed in situations where a board can deny the sale of a unit despite a buyer being financially qualified. When the latter happens, sellers are sometimes placed in financially challenging situations, where they may have an extra mortgage and monthly maintenance costs indefinitely, or be unable to move into a different property.

Constitutionality of Int. 1120

In June 2019, NYSAR had an outside legal firm (Davis Wright Tremaine) examine the constitutionality of proposed legislation that would:

- require co-ops to approve or deny new shareholders seeking to purchase apartments within a set timeframe, and
- construe the failure of a co-op to approve or deny such applications within that timeframe as consent by the co-op to the purchase.

The legal analysis found that such a law should withstand judicial scrutiny and not violate the takings clause of the fifth amendment of the U.S. Constitution. On the latter, the analysis specifically found that the aforementioned provision in Int. 1120 would not be an unconstitutional physical or regulatory taking. Case law, including U.S. Supreme Court rulings, support this finding.

NYSAR has included a copy of this legal analysis with our testimony.

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Conclusion

Int. 1120 would greatly improve the process for buyers and sellers of cooperative housing. The flexibility and exemptions within the legislation are designed to make this a workable law that will help individuals and families more expeditiously access housing within New York City, at a time when housing inventory and vacancies remain incredibly low. Evidence from 5 counties outside of New York City point to a process that has worked well without burdening cooperative boards either financially or legally. The time to enact Int. 1120 is now, and NYSAR appreciates the opportunity to submit these comments. We look forward to working with the City Council on the passage of legislation that would enhance transparency and fairness within the cooperative purchase process.

MEMORANDUM

To: New York City Council

From: New York State Association of Realtors (NYSAR)

Date: June 26, 2019

Re: Constitutional Validity of Measure to Improve the Co-Op Purchasing Process

This memo briefly addresses the constitutional validity of a proposed regulation that: (i) would require co-ops to approve or deny new shareholders seeking to purchase apartments within a set timeframe, and (ii) would construe the failure of a co-op to approve or deny such applications within that timeframe as consent by the co-op to the purchase. As set forth below, we believe that such a measure would withstand judicial scrutiny and not be an unconstitutional physical or regulatory taking.

The Proposal Would Not Constitute a Physical Taking.

As an initial matter, before one even gets to the question of whether the regulation would impose a "physical taking," we believe there is a strong argument that, if enacted, the regulation would not be construed as affecting any *property* rights at all. The requirement that a co-op approve sales or transfers of shares is normally set forth in a proprietary lease between the co-op and shareholders – in short, in a contract. The co-op's consent is simply a precondition for the transfer of shares. Construed consent would not *cause* a transaction to happen (or create any possessory interest), it would only clear a hurdle to a potential sale.

Most importantly, under the relevant caselaw, the proposed regulation would not constitute a physical taking because it would not impose any new use of the property.[1] It is a well-recognized basic principle that property rights in a physical thing include the right to "possess, use and dispose" of property, and the U.S. Supreme Court has stated that the "right to exclude" is "one of the most essential sticks in the bundle of rights that are commonly characterized as property."[2] Accordingly, the issue here is whether construing undue delay as

[1] "The Takings Clause of the Fifth Amendment provides that private property shall not 'be taken for public use, without just compensation.'" *Murr v. Wisconsin*, 137 S.Ct. 1933, 1942 (2017) (quoting U.S. Const. amend. V). This clause applies to states through the Fourteenth Amendment. *Id.* "Moreover, to constitute a physical taking, the occupation need not be by the government itself, but may be by third parties under its authority." *Seawall Assoc. v. City of New York*, 74 N.Y.2d 92, 103 (1989) (citing *Loretto v. Teleprompter Manhattan CATV Corp.*, 458 U.S. 419, 432, 433 n 9 (1982).

[2] *Loretto*, 458 U.S. at 433.

consent to the transfer of co-op shares would be an unconstitutional deprivation of the co-op's right to exclude new shareholders.[3]

The Supreme Court has observed that the takings clause "preserves governmental power to regulate, subject only to the dictates of justice and fairness."[4] While a "landowner's right to exclude" is an important aspect of property ownership, "the denial of one traditional property right does not always amount to a taking."[5] Thus, in the real estate context, courts have found that interference with a property owner's "right to exclude" constitutes a physical taking only if the regulation also imposes on the owner a new use of their property.[6]

For example, in *Seawall Assoc. v. City of New York*, the Court of Appeals overturned a City law requiring owners of single residence occupancy (SRO) properties "to restore all units to habitable condition and lease them at controlled rents for an indefinite period."[7] The Court held this to be a physical taking because it not only forced property owners to "accept the occupation of their properties by persons not already in residence," but also subjected them "to a use which they neither planned nor desired," since the owners had acquired the buildings for more profitable, commercial development.[8] In contrast, the court explained in *Seawall*, laws like rent regulations are not constitutionally problematic because they "merely involve[] restrictions imposed on existing tenancies where the landlords had voluntarily put their properties to use for residential housing."[9] For example, in another case, the Court of Appeals held that, unlike forcing owners to operate SROs, expanding the definition of "family member" for purposes of rent control and rent stabilization was *not* a physical taking because no new use of the property was imposed.[10] "The difference--dispositive here--between requiring an owner to accept a purported stranger as a tenant and compelling the owner to rent out single room occupancy accommodations is in the owner's voluntary acquiescence in the use of its property for rental housing."[11]

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[3] As noted above, the proposal does not raise a taking issue as to shareholders or potential purchasers, because consent to a sale by the co-op does not deprive either the seller or potential purchaser of any property right.

[4] *Andrus v. Allard*, 444 U.S. 51, 65 (1979).

[5] *Id*. at 65-66 ("At least where an owner possesses a full 'bundle' of property rights, the destruction of one 'strand' of the bundle is not a taking, because the aggregate must be viewed in its entirety.").

[6] *See, e.g.*, *Seawall*, 74 N.Y.2d at 103; *Rent Stabilization Ass'n of New York City, Inc. v. Higgins*, 83 N.Y.2d 156 (1993); *Fed. Home Loan Mortg. Corp. v. N.Y. State Div. of Housing*, 87 N.Y.2d 325, 335 (1995).

[7] *Seawall*, 74 N.Y.2d at 99.

[8] *Id.* at 105.

[9] *Id.*

[10] *Rent Stabilization Ass'n*, 83 N.Y.2d at 156. *See also Fed. Home Loan Mortg. Corp.*, 87 N.Y.2d at 335 (Under rent stabilization law, a co-op exempt from rent regulated status can revert to rent-regulated status after foreclosure without imposing a physical taking, because property owner "voluntarily purchased the occupied building and acquiesced in its use as rental housing.").

[11] *Rent Stabilization Ass'n*, 83 N.Y.2d at 172 (citing *Seawall*, 74 NY2d at 106).

Under these precedents, the statutory proposal at issue here would not constitute a physical taking because the fundamental use of the affected properties as residential co-ops would remain unchanged. It is also substantially less harsh than the regulations discussed above because co-ops would retain *all* of their current rights, so long as they exercised their discretion to approve or deny a prospective shareholder within a reasonable amount of time. By enhancing transparency and certainty for buyers and sellers of co-ops, the proposed regulation strikes a balance that falls squarely within the "dictates of justice and fairness."[12]

The Proposal Would Also Not Constitute a "Regulatory" Taking.

Even where a law does not amount to a physical taking of personal property, the Supreme Court has found that "if regulation goes too far it will be recognized as a taking."[13] This normally arises in one of two contexts. First, a "regulation which 'denies all economically beneficial or productive use of land' will require compensation under the Takings Clause."[14] "Second, when a regulation impedes the use of property without depriving the owner of all economically beneficial use, a taking still may be found based on a complex of factors, including (1) the economic impact of the regulation on the claimant; (2) the extent to which the regulation has interfered with distinct investment-backed expectations; and (3) the character of the governmental action."[15] Unlike the stringent standard applied to physical takings, regulatory takings are subject to a "more flexible and forgiving standard."[16]

The proposal at issue here is unlikely to be invalidated as a regulatory taking. Clearly, it would not deprive co-ops of all economic benefit from their property. Nor would it impose any economic impact, or interfere with the investment purpose of the affected properties – use as a cooperative residential building. Perhaps most significantly, the measure is not a regulatory taking because co-ops would be "free to avoid the government condition" by simply exercising their discretion to approve or reject a putative purchaser within the provided timeframe.[17]

For the foregoing reasons, we believe the proposed regulation is constitutionally sound.

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[12] *Andrus*, 444 U.S. at 65.
[13] *Pennsylvania Coal Co. v. Mahon*, 260 U.S. 393, 415 (1922).
[14] *Palazzolo v. Rhode Island,* 533 U.S. 606, 617 (2001) (quoting *Lucas v. South Carolina Coastal Council*, 505 U.S. 1003, 1014 (1992)).
[15] *Murr*, 137 S.Ct. at 1943.
[16] *Horne v. Dep't of Agriculture*, 135 S.Ct. 2419, 2425 (2015). *See also Penn. Cent. Transp. Co. v. City of New York*, 438 U.S. 104, 124 (1978) ("A 'taking' may more readily be found when the interference with property can be characterized as a physical invasion by government, than when interference arises from some public program adjusting the benefits and burdens of economic life to promote the common good.").
[17] *Id.* at 2437.

PROJECT RENEWAL

Renewing lives. Reclaiming hope.

Council Member Erik Bottcher
New York City Council
250 Broadway
New York, NY 10007

Dear Council Member Bottcher,

On behalf of Project Renewal, thank you for the opportunity to share our support for Intro 1475. We appreciate your leadership in advancing policies that expand the range of safe, affordable housing options available to New Yorkers.

For more than 55 years, Project Renewal has provided shelter, housing, health care, and employment services to individuals experiencing homelessness, with particular focus on those navigating acute challenges including mental illness and substance use disorder. Across our programs, we continue to see how the city's housing shortage limits pathways to stability.

Addressing this crisis requires a mix of complementary approaches. Your legislation reflects this by opening the door to more flexible, well-managed housing options so we can meet the needs of New Yorkers who need an affordable place to call home. This flexibility is critical for reducing pressure on the shelter system and creating opportunities for people to move forward.

We are grateful for your commitment to thoughtful housing solutions and are pleased to support of this bill. Project Renewal looks forward to continued partnership as the Council advances policies that promote access, safety, and long-term stability for all New Yorkers.

Sincerely,

Eric Rosenbaum
President & CEO
Project Renewal

QUEENS COUNTY BAR ASSOCIATION

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Organized 1876

December 1, 2025

New York City Council
City Hall
New York, NY 10007

Attention: Council Member Pierina Sanchez, Chair
Committee on Housing and Buildings

Dear Members of the Housing Committee:

I am the co-chairperson of the Queens County Bar Association Cooperative and Condominium Law Committee and a member of the law firm of Hankin Mazel. Our firm's practice is almost exclusively devoted to the representation of cooperatives and condominiums in the City of New York, with over 25,000 units represented by our client base.

I submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill." Intro 407 is, in our view, one of the most severe and punitive anti–co-op-board-member legislative proposals ever introduced before this esteemed body. The bill purports to offer a solution where no demonstrated or pervasive problem exists in the operations of New York City's cooperatives.

The problems with this bill are manifold, including but not limited to the following:

The bill mandates burdensome written explanations for board decisions, turning ordinary business judgments into legalistic disclosures that invite conflict, misinterpretation, and litigation.

New York courts have long upheld the Business Judgment Rule, which protects boards acting in good faith and in the best interests of the cooperative. Intro 407 directly conflicts with this well-established legal standard, weakening a foundational protection for volunteer board members.

Co-op boards rely on unpaid volunteers. By exposing them to heightened scrutiny, potential liability, and mandatory justification of routine decisions, the bill will discourage qualified residents from serving, harming building governance.

By requiring detailed "reasons" for board decisions, the bill creates a litigation roadmap for disgruntled applicants or shareholders seeking to challenge denials, thereby raising legal costs for buildings — costs ultimately borne by residents.

Co-op boards evaluate applications holistically, considering sensitive financial and interpersonal factors. Forced written reasoning risks exposing confidential information and undermines the ability to make candid, responsible decisions.

Despite its sweeping impact, the bill is not supported by data showing systemic abuse by cooperative boards. Legislation should address real, demonstrated issues — not impose broad mandates based on isolated anecdotes.

Boards — many of which operate with limited resources — would face increased paperwork, legal review requirements, and governance strain, all without improving fairness or efficiency in the admissions process.

It is for these reasons that we respectfully request that Intro 407 be withdrawn or allowed to die a quick and quiet death, and that any future proposals aimed at addressing concerns in co-op admissions take a more reasonable, balanced, and evidence-based approach.

Thank you for your consideration of this testimony.

Sincerely,

Mark Hankin

Mark Hankin
Co-Chairperson, Queens County Bar Association
Cooperative & Condominium Law Committee

REBNY Testimony | December 2, 2025

The Real Estate Board of New York to
The City Council Committees on Housing and Buildings on Intros 407, 438, and 1120 on Coop Transparency

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY appreciates this opportunity to provide comments on the above-referenced legislation

BILL: Intro 0407-A-2024

SUBJECT: This bill would require coop boards to disclose in writing all reasons for denying the purchase of a coop unit within 5 days of deciding to deny such a purchase

SPONSORS: The Public Advocate (Mr. Williams) and Council Members Sanchez, Restler, Won, Krishnan, Narcisse, Ayala, Abreu, Williams, Avilés, Marte, Bottcher, Hanif, Cabán, Feliz, Farías, Ossé, Nurse, Hudson, Brooks-Powers, Gutiérrez, Salaam, Stevens, Joseph, De La Rosa, Louis, Hanks, Banks, Moya and Brannan (in conjunction with the Brooklyn Borough President)

This bill would require coop boards to provide in writing all specific reasons a prospective purchaser of a coop unit is turned down within 5 days of such a decision. The bill would also hold board members personally liable for failure to disclose all reasons for denying a purchase and would establish a process to legally challenge a board's decision regarding denying the purchase of a coop unit.

REBNY appreciates that many parties to co-op transactions would like to see more transparency regarding when proposed purchasers are denied. This bill seeks to shed light on whether discrimination plays a role in co-op board decision making. However, for several reasons outlined below, this legislation will make it harder for New Yorkers to purchase cooperatives units.

Discrimination in housing decisions is already prohibited by a significant body of federal, state, and local law. City and State law clearly prohibits discrimination in housing based on a wide range of protected classes and those who believe they have been denied the ability to purchase a cooperative unit due to discrimination can file claims at both City and State agencies and in court. It should be noted that, in spite of all the forums for complaints, there have been virtually no discrimination claims related to purchasing cooperative apartments in recent years.

In addition, co-op board members serve as unpaid volunteers who agree to help manage their co-op buildings. The potential assignment of personal liability would deter many residents from volunteering to serve on boards. In addition, the bill would further raise high insurance premiums and could lead to significant legal fees that could prevent co-ops from meeting many other fiduciary responsibilities.

Unfortunately, the unintended consequence of this bill will be to make it harder for New Yorkers to purchase cooperative units. This is the case not just because it will make operating costs of buildings more expensive but also because it will likely result in co-op boards raising the financial requirements needed to purchase shares to avoid any potential legal risks.

Bill: Intro 0438-2024

Subject: This bill would require co-op boards to disclose their finances to an accepted co-op perspective purchaser within 14 days of a request from such a potential purchaser.

Sponsors: Council Members Sanchez, the Public Advocate (Mr. Williams), Restler, Won, Farías, Cabán, Ayala, Louis, Salaam, Hudson, Avilés, Nurse, Stevens, Gutiérrez and Williams

This bill would require a co-op to disclose, upon request of a perspective purchaser, its assets and liabilities; capital projects planned or underway; the amount of any reserve fund; and its most recent budget or similar document. The bill also sets a penalty for failure to disclose such information.

REBNY believes that, in most cases, this information is already shared with perspective purchases. However, if the intent is to codify best practices, then the drafted language needs to be clarified. For example, it is not clear what “planned” nor “underway” capital projects means as some capital projects may be “planned” or in various stages of execution for many years before they are ever commenced. “Financial information” should be clearly defined as well by specifying the required fiscal year or allowing a current budget in lieu of audited statements.

Bill: Intro 1120-2024

Subject: This bill would establish timeframes for decisions regarding co-op transactions.

Sponsors: Council Members Amanda C. Farías, Nantasha M. Williams, Farah N. Louis, Chris Banks, Mercedes Narcisse, Robert F. Holden, Oswald J. Feliz, Rita C. Joseph, Rafael Salamanca, Jr., Susan Zhuang, Alexa Avilés, Diana I. Ayala, Selvena N. Brooks-Powers, Tiffany L. Cabán

This bill would require co-op boards to meet certain timeframes when making decisions about whether or not to accept prospective purchasers. In general, there would be a 10-day period for acknowledging receipt of offers and a 45-day period from the receipt of a complete application to disclose any decision about accepting or rejecting an application. There are certain extensions granted for these timeframes. A failure of a co-op board to meet the timeframe and fail to respond to the applicant within 10 days of a request for a response following 45 days (and any extensions granted) would result in the application being granted.

REBNY understands that many parties to co-op transactions would value a timeframe for decision making and that surrounding jurisdictions have standards similar to Intro 1120. To make this operational, the legislation should clarify who communicates what to whom—for instance, whether the board notifies the managing agent, who then informs the buyer's attorney or broker. This is especially important for self-managed buildings or those with limited broker involvement. Additionally, for all the above, timeline requirements should also allow for legitimate extensions and clarity (e.g., holidays or board schedules) to minimize administrative strain and confusion.

Any timeframe must be mindful of the fact that co-op board members serve on a voluntary basis. To that end, we would request 15 days for the acknowledgement of an application, with reasonable extensions as needed. In addition, acknowledgement of receipt of summer applications should be required by September 30, not September 10, again with reasonable extensions as needed. In addition, automatic approval of applications is not appropriate except in the most extreme cases, especially if applications are incomplete.

Thank you once again for allowing REBNY to submit testimony on these important proposed bills. We look forward to working with the Councill on these matters.

CONTACT:

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Breaking the Cycle of Homelessness
for Women and their Children

Testimony of Win (Formerly Women in Need, Inc.) for the New York City Council Committee on Housing and Buildings Hearing on Intro 1475
December 2, 2025

Thank you, Chair Sanchez and the esteemed members of the Committee on Housing and Buildings for holding this hearing and for the opportunity to submit testimony.

My name is Chris Mann, and I am the AVP of Policy and Advocacy at Win. Win is the City and nation's largest provider of shelter and supportive housing to families with children. We operate 16 shelters and nearly 500 supportive housing units across the five boroughs. Each night, nearly 7,000 people call Win "home," including 3,800 children.

Win strongly supports Intro 1475, which would permit the creation of shared housing rooming units in new and converted class A multiple dwellings. We believe that the only real solution to homelessness is housing, and Win strongly supports efforts to increase the housing supply, specifically options that alleviate pressure on the units most needed by homeless families.
New York City is in the midst of a profound housing crisis. According to the 2023 New York City Housing and Vacancy Survey (NYCHVS), the citywide net rental vacancy rate has plummeted to 1.41%, one of the lowest on record. For the lowest-cost units, those renting for less than $1,100, the vacancy rate is virtually non-existent at 0.39%. This scarcity drives homelessness and traps families in shelter simply because they cannot find an apartment they can afford.

Intro 1475 addresses a critical structural mismatch in our housing stock that disproportionately harms families. Currently, there is a severe shortage of housing designed for single adults. The 2023 NYCHVS found that 37% of all renter households in New York City are single-person households. However, studios make up only 6% of the city's total housing stock.

Without Single Room Occupancy (SRO) units or shared housing options, many single adults are forced to rent rooms in multi-bedroom apartments that are better suited to families. As a result, homeless families have less access to the two- and three-bedroom apartments they desperately need to move out of shelter. By legalizing and regulating shared housing rooming units, Intro 1475 would help create a dedicated supply of housing for single adults. This, in turn, frees up the limited supply of multi-bedroom units for the families who need them most.

The data is clear: we have too many single people competing for too few small units, creating a ripple effect that displaces families. Increasing the supply of shared housing is a common-sense solution that helps single adults find appropriate housing while preserving family-sized apartments for families.

To break the cycle of homelessness, we must use every tool at our disposal to expand our housing stock. Win urges the Council to swiftly pass Intro 1475 to help ensure that every New Yorker—single or family—has access to the safe, stable housing they deserve.
Thank you for your time and consideration.

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www.winnyc.org

UHAB Testimony to the New York City Council
Committee on Housing and Buildings

December 2, 2025

Honorable Chair Sanchez, Public Advocate Williams, and members of the Committee,

Thank you for holding today's hearing and for the opportunity to testify. My name is Arielle Hersh and I am the Director of Policy and New Projects at UHAB. For 50 years, UHAB has empowered low- and moderate-income residents to take control of their housing and become homeowners in the buildings where they already live. We turn distressed rental housing into lasting affordable co-ops, and provide comprehensive training and technical assistance to keep these homes healthy and stable for the long term. UHAB has created over 25,000 cooperative homes across the five boroughs, predominantly in formerly redlined neighborhoods of color.

We appreciate the Council's initiative in holding this hearing today encouraging transparency in co-op decision-making and share many of the same goals. In our role as a technical assistance provider to nearly 1,200 HDFC co-ops across New York City, we help boards make transparent, consistent, and equitable decisions in compliance with local, state, and federal laws regarding the sales of apartments to prospective purchasers. HDFC co-ops are a critical stock of affordable cooperative homeownership which provide an essential foothold for working New Yorkers to be able to become owners when so much homeownership is out of reach.

That said, the stock of HDFC co-ops is fundamentally different from the market-rate co-ops which Int. 407, Int. 438, and Int. 1120 are directed. Most HDFC co-ops operate with volunteer boards and are led by working people of color, often including elders. Many are currently experiencing difficulty complying with new local laws around gas piping inspections and climate upgrades among others. HDFC co-ops also tend to house more people of color, immigrants, and other marginalized groups with lower incomes than market rate co-ops. Recent research also indicates that HDFC co-ops are also more likely to accept voucher-holders compared with other kinds of housing, subsidized and market-rate. While we share the same goals as the Council, these bills would create an undue administrative burden on affordable HDFC co-ops already doing their part to ensure everyone has a fair shot at homeownership. **For these reasons, UHAB recommends that all HDFC co-ops be carved out of Int. 407, Int. 438, and Int. 1120.**

Most HDFC co-op boards meet monthly, making the timeline for compliance here prohibitive for a volunteer board. With regard to Int. 407, 5 days is overly-punitive even for the most high-functioning co-op board. The additional documentation included here may also be very difficult to compile and gather on the timeline outlined, and appears to be a mismatch in the requirement that individual co-op board members sign off on a certification, but the party responsible for discrimination remains the co-op corporation.

Moreover, the financial compliance package included in Int. 438 is substantial and would be very difficult for an HDFC co-op board to provide on the timeline requested. Particularly, a full accounting of cash flow, debt, and operating expenses and budgets for planned capital projects is a substantial amount of information to have available in 14 days, even with professional management. A significant portion of HDFC co-ops are self-managed and would have an even more difficulty compiling these records. UHAB acts as a bookkeeper for many HDFC co-ops and we see everything from hand-written budgets compiled by elders who have a difficult time using basic technology to automated monthly budgets and operating reports generated by professional management. This is setting up the most vulnerable buildings to hefty fines for noncompliance.

Furthermore, Int. 1120 raises particular concerns for HDFC co-ops, which have specific income restrictions and guidelines for incoming purchasers that must be adhered to based on a co-op's corporate documents. Int. 1120 would require co-ops to consider applications complete if they fail to respond within 10 days, and consider co-ops to consent to a sale where they have failed to acknowledge notice of receipt within 45 days. This sets up significant legal conflict with an HDFC co-op's corporate documents which specify specific income (and sometimes asset) criteria for prospective purchasers. Effectively, the law could push an HDFC co-op to accept prospective purchasers who have submitted incomplete applications, are not income-qualified for the unit they are applying to, or may need additional information to confirm assets or other kinds of compliance before approving a sale.

To truly address compliance and transparency around unit sales in HDFC co-ops, we need a comprehensive approach closely coordinated with supervising agencies like HPD and HCR, as well as contracted technical assistance providers. Over 80% of HDFC co-ops will face a financial and regulatory cliff in 2029 when the current property tax benefit for HDFC co-ops (the DAMP Tax Cap) expires. At that point, those HDFC co-ops will need a new regulatory and tax benefit structure to maintain affordability and compliance. There may be meaningful opportunities to encourage HDFC co-ops to comply with some of these goals at that juncture in close coordination with relevant stakeholders.

We would also encourage the Council to consider the following regarding this package of legislation:

- It appears unclear what happens to sales of units owned by the co-op corporation across all three pieces of legislation.
- The carve outs and exemptions should be as uniform as possible across all three pieces of legislation to ensure clarity for compliance.
- Int. 438 could be amended to improve clarity regarding the time frame of financial documents requested. For many of the named categories like operating costs, preserve amounts, and budget, the last calendar year's documents on file could streamline compliance.
- Int. 407 may create liability concerns for individual board members and with disclosure requirements.
- All three bills may create a legal obligation for co-ops to update their corporate documents, which may require additional time and cost, and should be factored into implementation.

We remain ready to engage with the Council and supervising agencies to keep HDFC co-ops compliant with all local, state, and federal laws regarding nondiscrimination. UHAB provides weekly trainings on a wide range of topics, including Introductions to Cooperative Homeownership for new and prospective HDFC co-op buyers to help them understand the co-op purchase process, and Board Ethics and Confidentiality, Board Roles and Responsibilities, Property Management, and many more that help HDFC co-ops boards stay on top of compliance. We also serve as a technical assistance provider to HDFC co-ops and have staff assigned to every HDFC co-op in the City to help co-op boards navigate unit sales, new shareholder selection, and ongoing compliance with local laws.

We would welcome the opportunity to engage with the Council and supervisory agencies around this matter.

Thank you again for the opportunity to testify.

Lantern Organization

December 2025

Testimony of Lantern Organization Regarding the Shared Housing Bill Int 1475-2025

Submitted to the New York City Council Housing and Buildings Committee

Chair, members of the Committee, and distinguished Council Members:

Thank you for the opportunity to submit testimony on behalf of Lantern Organization, a nonprofit developer and operator of supportive and affordable housing serving New Yorkers experiencing homelessness, serious mental illness, substance use disorder, and other health conditions.

Lantern currently operates 444 units of SRO shared housing across five buildings in Manhattan, along with more than 1,000 units of studio and larger affordable and supportive apartments. With over two decades of experience in supportive housing, we have a clear, data-driven understanding of how shared housing performs relative to traditional apartment models.

Shared Housing Achieves Outcomes Equal to Studio and Larger Apartments

Our operational data demonstrates that SROs are just as effective as traditional units in promoting long-term stability and resident quality of life outcomes. In 2024:

- 99% of our SRO residents achieved housing stability, equivalent to outcomes in our studio and larger units.
- 100% of our SRO residents increased or maintained their cash income and benefits, equivalent to outcomes in our studio and larger units.
- 100% of our SRO residents maintained their health insurance, equivalent to outcomes in our studio and larger units.
- Behavioral incidents occurred at similar rates across both SRO and non-SRO buildings.

Lantern Organization

These metrics show that shared housing is a highly effective model for supportive housing and affordable housing, fully capable of delivering the outcomes that City agencies prioritize.

Shared Housing Provides Similar Outcomes at Lower Cost

While resident outcomes are similar, shared housing is significantly more affordable to develop and operate. As construction and financing costs continue to rise, SROs allow scarce City capital funds to house more New Yorkers for every dollar invested. In Lantern's internal analysis of three recent development opportunities, SRO/shared housing designs produced approximately 40% more units for the same level of City capital subsidy. This finding aligns with national research showing that smaller, simpler, code-compliant units expand access to supportive and affordable housing without compromising safety or resident outcomes.

Protect Existing Shared Housing: Do Not Apply New Design Requirements Retroactively

We respectfully urge the Council to ensure that the proposed legislation does not impose new requirements—design, programmatic, or operational—on existing shared housing.

Many of the SRO buildings currently operating in NYC are older structures or commercial conversions that cannot feasibly be retrofitted to meet new construction standards. Imposing retroactive requirements could:

- Disrupt tenancy and reduce affordability
- Force costly renovations that buildings cannot support
- Render some existing shared housing noncompliant

For these reasons, we ask the Council to clearly exempt all existing shared housing from any new construction or design rules, and apply new standards only to newly constructed SRO units or substantial rehabilitations.

Support Commercial Conversions by Aligning Design Guidelines with HUD Housing Quality Standards

Lantern Organization

For new shared housing developments, especially commercial conversions, we urge the City to adopt flexible design guidelines that reflect the diversity of building types available for adaptive reuse.

The current draft standard requiring one full-sized kitchen for every three units, and one bathroom for every three units both exceed HUD's Housing Quality Standards (HQS) (available at: https://www.ecfr.gov/current/title-24/subtitle-B/chapter-IX/part-982/subpart-I).

These requirements would render noncompliant the shared housing building prototypes proposed by Gensler and The Pew Charitable Trusts, an innovative and nationally recognized model for shared housing and commercial-to-residential conversion. Their prototypes rely on compact private units and efficient shared facilities—exactly the type of evidence-based, cost-effective design New York City seeks to scale. Imposing rigid kitchen and bathroom ratios would make many such conversion concepts financially or physically infeasible in the NYC commercial building stock.

For these reasons, we recommend that HPD design guidelines for new SRO construction and conversions mirror HUD HQS.

This would ensure:

- Safety and habitability remain fully protected
- Conversion projects remain financially viable
- The City can maximize the number of units created through commercial-to-residential pathways
- High-impact prototypes—such as the Gensler/Pew model—can be deployed in NYC rather than disqualified

Conclusion

Lantern Organization strongly supports the City's efforts to expand shared housing as a cost-effective, evidence-supported model for addressing homelessness. Our experience shows that SROs deliver equivalent outcomes, comparable safety, and dramatically greater affordability.

We respectfully ask the Council to:

1. Protect existing SRO buildings from new design and operational requirements.

Lantern Organization

2. Adopt HUD-aligned, flexible design guidelines for newly built and converted SRO housing.
3. Treat shared housing as a central tool for scaling permanent affordable housing in New York City.

Thank you for your consideration and for your leadership in advancing housing models that meet the urgent needs of New Yorkers. We would be pleased to provide additional data, cost analyses, building tours, or technical assistance as the legislation advances.

Sincerely,

Dan Kent

President/CEO

LIBOR
LONG ISLAND BOARD OF REALTORS®

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1305 Walt Whitman Road, Suite 310, Melville, NY 11747

December 2, 2025
New York City Council Hearing – Committee on Housing & Buildings
Re: LIBOR Testimony on New York City Co-Op Transparency

Good morning, Chair Sanchez and Councilmembers serving on the Housing & Buildings Committee,

My name is Yvette Clark Watkins. I am speaking to you today on behalf of the Long Island Board of REALTORS® (LIBOR), a 27,000-member trade association for real estate professionals in Queens, Nassau and Suffolk County, of which I am proud to call myself Secretary-Treasurer and President-Elect. I wear many hats as a REALTOR®, but also as a mother of twins in college and am active in my community of Addisleigh Park in St. Albans, Queens.

REALTORS® across Queens are strongly in favor of Councilmember Farias' Intro Number 1120-A, a key step forward to bring much needed transparency to New York's co-op market. The housing crisis is real. As I have shared with many members of the City Council over the past year's conversations, co-operative housing is increasingly the first step towards homeownership and building newfound intergenerational wealth for so many New Yorkers. But change is needed now.

This is not really about REALTORS® and the application packages we put together for our clients. This is about the buyers and sellers we serve families and households with dreams that are put on hold whenever a transaction is delayed because a co-op board has not acted in good faith. With no current requirement for boards to respond to an application in a timely manner, New Yorkers are placed at a higher risk of falling into financial limbo than their suburban neighbors. Deals and dreams fall apart, but it does not have to be this way if we have timelines.

We have all shared with colleagues our stories about "problem" co-op boards, of clients who got "the run around" and will always have to wonder; did they not get their co-op because of their credit score, or because of who they are? Currently, when a co-op board does not want "certain people" to live in their building, they simply do not respond. With all that New York City has worked at to better address fair housing, it is simply bad for business and most of all, bad for New Yorkers to allow this "co-op loophole" to persist.

Intro 1120 is not asking for our clients to be accepted in a development where they cannot afford to live. A responsible REALTOR® is focused on helping clients find a place where they belong, based on both their finances and their personal desires. Our clients, your own constituents, deserve basic fairness to know when to move on with their search for a home.

While LIBOR also supports Intro 407, the issue remains: a well-financed co-op board may still "sit" on an otherwise qualified applicant as a backdoor form of discrimination. Fines are a useful tool in the right circumstance, but they still will not provide consumers with fair access to housing.

As a professional REALTOR® and leader at LIBOR, I speak for my members when I implore this Committee to advance Intro. 1120 and seek its passage before the full Council. I appreciate the opportunity to testify before you today as you hold this very important and timely hearing. Thank you.

Yvette Clark Watkins, Addisleigh Park, St. Albans, Queens.

TESTIMONY OF
NEW YORK APPLESEED

NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING & BUILDINGS
INT. NO. 0407-2024

December 2, 2025

My name is Nyah Berg, and I serve as the Executive Director of New York Appleseed, a nonprofit organization that advocates for integrated schools and communities and has worked for over a decade to address public school segregation in New York City. I am testifying today in support of **Intro 407**, the *Fair Residential Cooperative Disclosure Law*, which would require cooperative corporations to provide prospective purchasers with a written statement of all their reasons for withholding consent to a sale.

New York Appleseed testified in support of this same bill in 2017, calling it "long overdue" then, as it remains today. At that time, we warned that this City must not continue to "put our heads in the sand in the face of undeniable evidence that racism continues to severely limit the housing options available to people of color." Yet, as we approach 2026, we find ourselves once again testifying on the same legislation–legislation that would bring equity and transparency to a process long shrouded in secrecy and bias.

New York City remains one of the most segregated school systems in the country, and while housing segregation is not the only cause, it is undeniably one of the most prominent. To dismantle deeply rooted school and housing segregation, we must be just as intentional in crafting our solutions as segregation was in shaping our present reality. Expanding access to housing—including homeownership—cannot be limited to certain neighborhoods for certain people. Any suggestion that housing discrimination no longer curtails opportunity in 2025 is, at best, naïve and, at worst, knowingly false.

The reason such secrecy in cooperative housing decisions persists cannot possibly be that it serves the public interest, but rather that it can undermine fair housing enforcement. When reasons for rejection are hidden, a critical lever of accountability disappears, allowing discrimination to flourish behind closed doors.

We have heard claims that this bill would create an onslaught of litigation or discourage board members from serving if required to disclose their reasoning. This is a manufactured crisis. If board members fear litigation simply because they must state their reasons in writing, that concern itself underscores why transparency is so necessary. Accountability should not deter civic participation, unless that participation depends on avoiding it.

Intro 407 is easy to comply with: a board meets to discuss what to do about an application. In the vast majority of cases, the applicant is approved, and no statement is required. Where there is a rejection, the reasons for the rejection must be specified in writing.

We fully supported this legislation in 2017 and continue to support it now. Let's not allow another decade to pass before we take this small but vital step toward equity, accountability, and fair housing in New York City.

Actors Fund Housing Development Corporation
A subsidiary of the Entertainment Community Fund

December 2, 2025

Actors Fund
Housing Development
Corporation
729 Seventh Ave.
10th Floor
New York, NY 10019
T: 212.221.7300

Re: Shared Housing Bill – Testimony

Dear Chairperson and Member of the New York City Council,

My name is Daniel Arnow and I'm the Executive Director of Actors Fund Housing Development Corporation (AFHDC). Our mission is to develop affordable housing for the performing arts and entertainment community. AFHDC brings together educational programming, advocacy, marketing and real estate development with the goal of increasing access to affordable housing opportunities for the communities we serve. AFHDC is a subsidiary of the Entertainment Community Fund.

I am pleased to provide this testimony in support of the Shared Housing Bill – Intro 1475. Thank you to Council Members Bottcher and Restler for sponsoring legislation that would lower barriers to creating shared housing units in New York City while establishing design and operational requirements for these units.

We need more housing options for New Yorkers, including shared housing, to address our complex housing crisis. The Shared Housing Roadmap, produced by HPD, takes a thoughtful approach to reenvisioning the SRO model that can fill a gap in the market, to provide more housing for single adults, while increasing tenant protections for renters. Shared housing can be a smart solution in adaptive reuse projects, add a new tool to our affordable housing toolkit, and even increase social connectivity and combat social isolation for vulnerable populations.

We know firsthand, as an owner/operator of shared housing, the benefits and challenges of this important housing model. The Dorothy Ross Friedman Residence is an affordable and supportive, shared housing residence consisting of 178 units on W57th Street in Manhattan. The building is designed to serve persons with HIV/AIDS, senior citizens, and low-income individuals many of whom are in the performing arts entertainment community. We provide on-site social services for residents.

Apartments at The Friedman Residence are comprised of two- and three-bedroom shared suites and one four-bedroom shared suite. In shared suites, each tenant has their own rent-stabilized lease, individual bedroom, and shares a living room and kitchen with one or two people. Some apartments have a shared bathroom, others have private baths. In addition to shared-units, there are 27 one-bedroom units.

Since opening in 1996, The Friedman has been a unique community asset, and as suggested in the Shared Housing Roadmap, has provided community and services for individuals who may be isolated or vulnerable in traditional housing. Shared housing also creates unique challenges, especially around roommate conflict. We have created a robust tenant handbook with information and resources including a guide for living with a roommate, roommate guidelines, and conflict management. It is critical to have a strong onsite property management and social service team to successfully execute a shared housing program.

While many SRO programs have deteriorated, we cannot abandon shared housing, especially in the current crisis. With good legislation, like Intro 1457, financial tools, and guidance to align building operations and management policies with best practices, we can reinvent shared housing to serve future generations of New Yorkers. We're happy to support this bill.

Sincerely,

Daniel Arnow
Executive Director
Actors Fund Housing Development Corporation

Testimony of Britny McKenzie, Policy Director
Fair Housing Justice Center (FHJC)
Hearing of the New York City Council Committee on Housing and Buildings
Fair Residential Cooperative Disclosure Law, Intro. 0407-2024
December 3, 2025 – 10:00 a.m.

The Fair Housing Justice Center (FHJC) is a nonprofit civil rights organization committed to eliminating housing discrimination, promoting inclusive and accessible communities, and strengthening the enforcement of fair housing laws throughout New York City and the seven surrounding counties.

For over two decades, FHJC has played a leading role in advancing housing equity and access across our region. We have assisted thousands of individuals and organizations in challenging discriminatory practices, filing complaints, and asserting their legal rights under local, state, and federal fair housing laws. Our organization operates a full-service fair housing program that includes proactive investigations, systemic testing, litigation support, policy advocacy, education, and technical assistance.

Through our investigative work, FHJC has uncovered widespread discriminatory practices among both private housing providers and public agencies. Our legal actions—more than 160 in total—have resulted in increased compliance, opened access to over 80,000 housing units, and secured over $55 million in damages and penalties. Yet, despite these victories, discrimination remains a persistent force shaping housing opportunity and access in New York City.

I appreciate the opportunity to provide this written testimony to the New York City Council's Committee on Housing and Buildings regarding this crucial legislative initiative under consideration. We submit this testimony today to urge the City Council to act promptly to pass this critical legislation and to support Intro 407 *without any amendment that weakens its disclosure* principle.

The Problem is Cooperative Secrecy: Requiring boards to disclose their reasons for rejection is a matter of fundamental fairness.

New York City is renowned for its progressive spirit, yet we still face challenges in creating a consistent and strong commitment to tackling the deep-rooted inequalities in housing. Even as many elected leaders proudly celebrate our city's incredible diversity and declare

that "hate has no place here," we must confront a harsh reality: housing discrimination and segregation continue to impact the lives of too many New Yorkers. A particularly important, yet often overlooked, aspect of this issue exists within the cooperative housing sector.

Cooperative housing presents a fantastic opportunity for New Yorkers. The city's over 450,000 co-op units represent immense potential for generational wealth-building. However, the application process can be daunting and confusing. Many enthusiastic applicants find themselves rejected without clear reasons, despite taking all necessary steps like securing financing, signing contracts, and submitting applications. The lack of transparency in co-op boards' decision-making processes fosters an environment where discrimination—whether intentional or not—can persist unnoticed.

This lack of transparency has clear harms:
- It enables discrimination by shielding decision-makers from accountability.
- It makes enforcement of fair housing protections extremely difficult.
- It prevents rejected applicants from knowing whether a denial was fair or discriminatory.
- It discourages qualified, often underrepresented applicants from pursuing opportunities in co-op buildings where they are not the demographic norm.

The Fair Residential Cooperative Disclosure Law will Open Previously Closed Units of Homeownership.

Intro 407 is straightforward. When a co-op board denies an applicant, the board must provide the applicant with a written statement of the reasons for rejection. It does *not* dictate whom the co-op must accept; it simply calls for "cards on the table."

Key benefits include:
- **Precedent.** Similar disclosure laws already exist in Westchester and Suffolk counties without catastrophic consequences; boards there continue to function.
- **Transparency.** Requiring written reasons shines a light on admissions decisions and allows applicants and advocates to assess whether discrimination may have played a role.
- **Accountability without undue burden.** The bill explicitly states that it does *not* limit the legitimate reasons a co-op may decline an applicant. It only asks that those reasons be articulated.
- **Support among New Yorkers.** Polling shows large margins of support—from all boroughs, races, ages, incomes—for this kind of transparency.

Addressing Myths Opposed to the Fair Residential Cooperative Disclosure Law.

Over the years, opponents of the bill have raised several common yet misplaced arguments in an effort to undermine its purpose. Such as:

- *"We already have fair housing laws."* However, secrecy at the co-op admissions stage fundamentally undermines those laws, because discriminatory decisions are hidden and unchallengeable.
- *"That bill will spark a flood of litigation."* Not true. Because turndowns are rare and the board already knows the reason for rejection, this bill merely formalizes what is already known internally; and will only show the data.
- *"The compliance will be burdensome."* The record-keeping requirement is minimal (e.g., the number of turndowns and applications over three years).
- *"The board members will refuse to serve out of fear of liability."* If board members fear accountability, their protection of secrecy is itself evidence of a problem. A survey revealed coop owners supported disclosure by a margin of more than 2-to-1.

These myths unveil a significant truth: the opposition is less about real burdens and more about preserving a privileged status quo that excludes many. This is a pivotal moment for us! The City Council has the remarkable opportunity to champion our core values or allow inequity to persist behind closed doors. If we genuinely care about civil rights, inclusivity, and fairness, we must act in ways that reflect those beliefs. We wholeheartedly encourage the City Council to stand strong for Intro 407, resisting any amendments that might dilute its essence of transparency.

While we know that New York's housing market won't transform overnight, introducing clarity in co-op admission decisions will reduce one of the most opaque barriers to homeownership in our city. Intro 407 is a vital, yet achievable step forward; it clearly communicates: no more secrecy, no more exclusion, and no more concealing discrimination through board decisions.

Thank you for your time, your leadership, and your dedication to ensuring housing justice for every New Yorker. I can be contacted via email at bmckenzie@fairhousingjustice.org

FHJC
Fair Housing Justice Center

Fair Residential Cooperative Disclosure Law

NYC Intro 0407-2024

The problem of cooperative (co-op) secrecy

Currently, co-ops boards throughout the city refuse to tell rejected applicants why they were turned down. This lack of disclosure especially harms applicants who are demographically different from the majority in a given building or neighborhood, making it nearly impossible for them to know whether the rejection was justified or the result of unlawful bias. This lack of transparency makes it difficult to determine the reasons behind a rejection, discouraging applicants who may have faced discrimination from asserting their legal rights. Requiring boards to disclose these reasons is a matter of basic fairness. Without this transparency, it becomes too easy for boards to engage in discriminatory practices in violation of the City's Human Rights Law.

What does the Fair Residential Cooperative Disclosure Law do?

Intro 407 will require co-op boards to provide rejected applicants, in writing, the specific reasons for rejection, five days after the decision is made. This law will increase transparency and allow applicants to determine their course of action, including potentially asserting their fair housing rights. The bill specifically allows co-op boards to continue to reject applicants for any and all legal reasons for which they can turn people down now.

Join in supporting co-op disclosure

The bill is co-sponsored by 29 Members of the Council – three more than a majority – and is supported by numerous civil rights and allied organizations. Polling shows that disclosure is supported by New Yorkers in every part of the city and in every racial, ethnic and income group by a margin of more than 3 to 1.

SPONSORS OF INTRO 407 INCLUDE:

Public Advocate Jumaane Williams, Pierina Ana Sanchez, Lincoln Restler, Julie Won, Shekar Krishnan, Mercedes Narcisse, Diana I. Ayala, Shaun Abreu, Nantasha M. Williams, Alexa Avilés, Christopher Marte, Erik D. Bottcher, Shahana K. Hanif, Tiffany Cabán, Oswald Feliz, Amanda Farías, Chi A. Ossé, Sandy Nurse, Crystal Hudson, Selvena N. Brooks-Powers, Jennifer Gutiérrez, Yusef Salaam, Althea V. Stevens, Rita C. Joseph, Carmen N. De La Rosa, Farah N. Louis, Kamillah Hanks, Chris Banks, Francisco P. Moya, Justin L. Brannan, (in conjunction with the Brooklyn Borough President)

SUPPORTERS OF INTRO 407 INCLUDE:

Asian American Legal Defense and Education Fund, Broadway Community,New York Housing Conference, Brooklyn Level Up, Community Service Society of New York; Disability Rights Advocates, ERASE Racism, Fair Housing Justice Center, Housing Opportunities Made Equal of New York, Housing Rights Initiative, Housing Works, JASA/Legal Services for Elder Justice, Lambda Legal, Latino Justice PRLDEF, Lawyers' Committee for Civil Rights Under Law, Long Island Housing Services, NAACP Legal Defense and Educational Fund, Inc., National Fair Housing Alliance, New Economy Project, New York Appleseed, New York Lawyers for the Public Interest, New York State Council of Churches, Open New York, Poverty & Race Research Action Council, Westchester Residential Opportunities, Western Queens Community Land Trust, and South Bronx United, ANHD, Believe NY, CIDNY, Community Voices Heard, New York Housing Conference, Bushwick Housing Independence Project

Join the list of supporters **here** or contact Britny Mckenzie,
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To: Erik Bottcher, New York City Council

From: Steven J. Ancona

Date: December 1, 2025

Re: Written Testimony on Shared Housing

I am a residential developer and manager of many hundreds of apartment units in New York City, and have been an Adjunct Professor at the NYU Schack Real Estate Institute Master's Degree program for over 11 years, currently teaching a course in Multifamily Development.

I applaud Councilman Bottcher and his colleagues for addressing shared housing as a tool to help with affordability. However, I note that some of the provisions of the proposed legislation seem unduly burdensome and may impede its effectiveness.

"Shared Housing" has been a normal practice far before the term came into use. It is estimated that ~40% of NYC Households are roommate shares, as young people starting out their careers or education in NYC opt for roommates for both affordability and social reasons. Lifestyle trends and technology have modified this practice, and these same young people are much more willing to live with roommates they haven't yet met in person. They also prefer to be independent of their roommates, both financially and by lease term. Technology now allows roommate matching and ease of modifying leases to change roommates.

Some of the provisions of the proposed legislation will impose undue burdens on some "Suite-style" **Class A** units, **even though those units are in compliance with the Multiple Dwelling Law now**. Some examples are as follows:

#4 Prohibits framed dwellings from shared housing, although many such buildings already have units with multiple bedrooms and roommate households. These units also must comply with all current building codes.

#5 Cleaning of common areas by the owner is required. This should be a market driven decision by a property owner and renters. It can drive up building operating costs that might make shared housing impractical for many owners, where renters may prefer to save money and clean up after themselves.

#7 Minimum size of bedrooms are larger than the MDL requires. Bedroom sizes should also be a market-based decision for renters and owners, as long as they comply with minimum sizes under the MDL.

While some of these provisions may make sense in true "SRO" units, where each room is independently locked, or in dorm-style units with higher ratios of beds to kitchen/bathrooms, they create unnecessary burdens for traditional apartments, and the unit types and associated rules should be distinguished.

Finally, Class A apartments with more than 3 bedrooms offer more efficiency for renters, as the price per bedroom typically drops as units get larger. Any prohibition in the legislation of higher bedroom count units for shared housing will limit affordability and defeat the purpose of this otherwise worthwhile endeavor.

BOND
NEW YORK

December 2, 2025

To Whom It May Concern,

I would like to express my strong support in a professional capacity for Intro. 438-2024, which would require cooperative housing corporations to provide prospective buyers with essential financial information about their buildings.

Co-op housing is one of the most important pathways to homeownership for working- and middle-class New Yorkers; however, unlike nearly every other type of real estate transaction in this city, co-op purchases often take place with very limited transparency. Buyers are routinely expected to make major financial commitments without access to basic information regarding the co-op's financial stability and projections, such as the building's debt load, reserve funds, operating expenses, or upcoming capital needs. This lack of information can leave both single purchasers and families vulnerable to unexpected assessments, financial instability, and even displacement.

Intro. 438 is a commonsense and modest step that provides buyers with the tools they need to make informed decisions about their prospective future home. Requiring the disclosure of financial statements, budgets, and planned capital projects within a reasonable timeframe is not burdensome; it is responsible governance. Mutual transparency between a prospective purchaser and the co-op community that they seek to join benefits everyone involved in the transaction: buyers, current shareholders, and in a larger sense, the long-term health of the building.

Moreover, the opacity of co-op processes has long contributed to inequitable and inconsistent treatment of applicants. When decisions happen behind closed doors, both intentional and inadvertent discrimination can flourish unseen. By providing objective information on the table and standardizing what buyers must be given, this bill supports fairness and accountability.

In a housing market as competitive and costly as ours in New York City, basic transparency should not be optional; it should be the standard.

For these reasons, I urge the Council to advance and pass Intro. 438.

Sincerely,

Brian P. Hourigan
Senior Managing Director
Director of Professional Development

810 Seventh Avenue, 27th Floor, New York, NY 10019 · Tel: 212.582.2009 · Fax: 646.328.4393

BOND
NEW YORK

December 2, 2025

To Whom It May Concern,

In light of my professional experience with respect to this topic, I would like to express my support of Intro 1120-2024, which would impose clear, reasonable timelines on cooperative ("co-op") boards when reviewing and responding to applications to purchase co-op apartments.

For too long, the sale and admission process in co-ops has operated without consistent standards — leaving applicants, sellers, and even boards themselves in limbo for indefinite periods. Intro 1120 addresses this by requiring that boards acknowledge receipt of a complete purchase application within 10 days, and then provide a final decision (approve, conditionally approve, or reject) within 45 days.

This kind of structure is not only reasonable in our competitive, time-sensitive housing market, but essential.

A known, standardized timeline protects both buyers and sellers from indefinite uncertainty. Many prospective purchasers secure mortgages, lock in financing, or plan relocation based on assumed timelines. A prolonged and unpredictable approval process can jeopardize financing, delay moves and create financial or personal hardship. By imposing reasonable deadlines, Intro 1120 ensures that people are not left waiting indefinitely.

Additionally, this expectation promotes fairness and accountability. With a set timeline, co-op boards must act — or risk automatic consent. This reduces opportunities for undue delay, arbitrary refusals, or informal "slow roll" tactics that disadvantage applicants, especially those without access to privileged networks.

Importantly, it aligns co-ops with broader housing standards and consumer protections. Buyers of condos, houses, rentals, and other property types benefit from predictable procedures; co-ops should be no different. Intro 1120 helps put co-op sales on the same track of transparency and fairness.

Sellers frequently depend on timely board decisions to proceed with their own moves or purchases. Long board delays can chain-react, harming multiple households. Having a firm deadline will help prevent cascading delays across the housing market.

I recognize concerns raised by some about applying a "one-size-fits-all" timeline to co-ops — especially smaller buildings or self-managed co-ops. However, the bill as written provides for modest flexibility through permissible extensions. And for many buildings, particularly those with brokers or professional management, these deadlines are wholly reasonable and align with what other jurisdictions already require.

In a city where housing is scarce, time-sensitive, and often emotionally and financially fraught, procedural clarity matters. Intro 1120 is a modest, commonsense reform to bring accountability, fairness, and predictability to a system long marked by opacity.

I urge the Committee to expeditiously approve Intro 1120-2024.

Sincerely,

Brian P. Hourigan
Senior Managing Director
Director of Professional Development

AMIE GROSS ARCHITECTS
Seeding Community

05 December 2025

New York City Council Committee on Housing and Buildings
250 Broadway
New York, NY 10007

Re: Shared Housing Bill; Written Testimony of Amie Gross, President of Amie Gross Architects

Dear Councilmember Sanchez and Members,

Amie Gross Architects (AGA) is in support of the Shared Housing Bill which would allow for the creation of shared apartments with individual bedrooms. However, as Architects who specialize in the design of affordable and supportive housing, we do caution that this building type should not be viewed as a housing solution for those who are unhoused and frail seniors. The buildings designed by AGA and developed by not-for-profit developers consist of studio apartments for single people. We have seen how the privacy of these spaces along with shared areas for socializing and receiving specialized services are huge part of the recovery of mental and physical health.

As evidenced by studies done by SHNNY, most vacant units are in shared apartments: either rehabbed SROs with communal bathrooms and kitchens or scattered-site units where unrelated tenants share space. Tenants placed in shared units often remain stuck due to the permanency of their leases, even when better-suited housing becomes available. These arrangements are deeply unpopular, leading to prolonged vacancies and lost rental revenue for nonprofits.

Increasing housing stock is a critical imperative for NYC, yet we must be cognizant that certain parts of our population require spaces specific to their needs. We recommend that this proposed legislation highlight that the intent of such housing is not to house those requiring supportive services.

Sincerely,

Amie Gross
President, Amie Gross Architects

1111 44TH RD STUDIO 302
LONG ISLAND CITY NY 11101
TELEPHONE 212 755 4010

Hon. Shaun Abreu
New York City Council, District 7
City Hall
New York, NY 10007

via email

Re: Alexandria House's Opposition to Intro 407, Intro 438, and Intro 1120A

Dear Council Member Abreu:

As members of the Board of Directors of Alexandria House, a cooperative community located within your district, we are writing to express our strong opposition to Intros 407, 438, and 1120A.

We believe that these bills will cause unintended harm and irreparably damage the cooperative housing model, which currently provides hundreds of thousands of New Yorkers with access to safe and affordable housing. We urge you to vote against these bills in their current form.

The requirements of Intro 407 would prove difficult—if not impossible—for volunteer board members to meet without risking serious personal liability. This could deter board participation and undermine the governance structure that allows cooperative buildings to run in a safe and efficient manner. The timelines contained in the bill are arbitrary and serve no deterrent purpose. The bill places undue preclusive effects on a singular statement, without accounting for the time it may take to sufficiently review and fact check such statement or correct inadvertent errors after the fact. Rather than invoking transparency into a board's decision, we believe the bill will create a roadmap for frivolous lawsuits based on unnecessary and impractical procedural timelines. In determining consent to a sale, cooperative boards are already limited by law to making decisions in accordance with existing legal requirements and the board's fiduciary duty to the members of its cooperative community. The passage of this bill would impact a board's ability to carry out such duty in good faith, risking operational capabilities of cooperative buildings across the city and putting hundreds of thousands of units at risk. Rather than passing this bill, we urge the Council to work directly with cooperative communities and housing advocates to shape decision transparency frameworks.

While many cooperative boards actively disclose audited financials to prospective purchasers, Intro 438 would require boards to disclose confidential and potentially inaccurate information to individuals who do not yet have a vested interest in the cooperative. Cash flow statements vary greatly depending on the time they are produced and therefore would not provide relevant insight to a prospective purchaser. Not only would it be difficult to provide an accurate estimation of the total costs of either active or planned capital improvement projects, but also the vague language in the bill does not provide boards with sufficient guidance to determine when such a project is considered "planned" for the purposes of the disclosure requirement. This could lead to inadvertent noncompliance and unjust financial liability. We urge you to vote against this bill and instead allow cooperative boards to continue providing reliable, audited financial statements to prospective purchasers.

While Intro 1120A allows boards to standardize applications in accordance with their own bylaws, the bill does not consider that a "one-size-fits-all" timeline will not meet the needs of buildings of various sizes and ownership requirements, or that application review is rarely linear. There will not always be sufficient personnel available to review an application within such a short timeline, and the notion that an application could be considered "complete" before application materials have been diligently reviewed is problematic. Close examination of application materials in accordance with a board's fiduciary duty to cooperative members often leads to follow-up questions, which may require additional materials or details to substantiate information a prospective purchaser has provided within its application. If passed, this bill will limit cooperative boards' ability to effectively review an applicant's financials and lead to significant financial risk to all community members.

Together, these bills will have a chilling effect on cooperative board participation, cause increases in operational and insurance costs which will be passed directly to owners, and negatively impact the housing market.

We thank you for your service to our district, and for your attention to the concerns these bills raise for our cooperative, cooperatives within our district, and across the city. We strongly urge you to vote against all three bills in their current form, given the negative impacts they will have on cooperatives and their volunteer boards members.

Sincerely,

Board of Directors, Alexandria House Inc.
Charles Wall, President
Elliot Winnick, VP
Ining Hsu, VP
Kevin Lyons, Treasurer
Margot Jacqz, Secretary
250 West 103rd Street
New York NY 10025

BeechHills
Shareholders, LLC

57-28 246th Crescent • Douglaston, N.Y. 11362
Management (718) 229-1598 • Maintenance (718) 229-7527
Fax (718) 428-5011 • www.beechhillscoop.com

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Beech Hills Shareholders, LLC, we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Beech Hill Shareholders, LLC, is a long-established cooperative community in Douglaston, Queens, founded on principles of fairness, shared responsibility, and community trust. We have 816 units of affordable middle and working class housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Beech Hills Shareholders, LLC respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Beech Hill Shareholders, LLC

Janice Schreibersdorf

President

Carlyle TOWERS COOPERATIVE A INC.
43-10 KISSENA BOULEVARD / FLUSHING, NEW YORK 11355
TEL.: (718) 445-9226

November 20, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.
Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided
This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning
Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard
We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Mong Sing Lee, President
Carlyle Towers Cooperative A, Inc.
43-10 Kissena Blvd
Flushing, NY 11355

Celtic Park Owners, Inc.
4810 43rd Street
Woodside, NY 11377

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Celtic Park Owners Inc. we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Celtic Park Owners Inc. is a long-established cooperative community in Woodside/Sunnyside, Queens, founded on principles of fairness, shared responsibility, and community trust. We have over 750 units of affordable middle- and working-class housing. Our volunteer board members devote countless hours to ensure safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Celtic Park respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Celtic Park Owners Inc.

BY

LE HAVRE

On the Water

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Le Havre Owners Corp., we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Le Havre Owners Corp. is a long-established cooperative community in Whitestone, Queens, founded on principles of fairness, shared responsibility, and community trust. We have over 1,000 units of affordable middle and working class housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Le Havre Owners Corp., respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Le Havre Owners Corp.

BY: Stanley Greenberg, President

December 1, 2025

Rebecca Poole

Director of Membership and Communication

Council of NY Cooperatives & Condominiums (CNYC, Inc.)

RE: 407A, 438, and 1120A

Dear Ms. Poole,

I am the President of Chatham Green, a co-op in downtown Manhattan with 420 apartments and 22 small businesses. Our shareholders range from Asian, to Caucasian, and Black. We are located in Chinatown and keep our expenses down through the renal of our business spaces. Every year, our expenses go up and every year there are more demands made by the city, like Local Law 11, that cost us significant amounts of money that we cannot easily predict and often have to pay for using a combination of increases in maintenance and assessments. Every year, our budget is tighter and more and more repairs wait until we can refinance. The bills proposed are going to increase expenses and open us to lawsuits that can end up causing extreme financial challenges.

We are opposed to the following bills: 407A, 438, and 1120 A. These bills will negatively impact our co-op in several ways, increase the probability of litigation, increase costs to shareholders, and increase our insurance costs (which are already significantly increasing) if we can even find insurance coverage for the types of claims that can be generated by these proposed bills.

I am a volunteer, as are all our Board members and most Board members in co-ops across the city. This means we volunteer our time and expertise for the benefit of the co-op. In our co-op there are very few people who will even consider running for the Board because they are afraid of lawsuits, don't have the time, or think that being on the Board is a thankless job—which it often is. Last year, not one person stepped forward to run for the three open positions on the Board. The three people whose terms were up, reluctantly volunteered to stay on for another term. This coming April, we will have four openings and likely few if any candidates. Proposal 407A, will make being on the Board even less appealing.

The requirement to disclose the reasons why a candidate is not accepted and thereby exposing ourselves to potential lawsuits will only add to the reluctance of people to even consider being on the Board. I have been President of the Board for five of my six-year term and do NOT plan to run again. The truth is that in all my five years, there was only one applicant I can recall that was declined and that was because the applicant did not meet our financial requirements. There was no discrimination. As mentioned, we are a multicultural, multiethnic co-op who value our neighbors. Since I've been on the Board, mostly Chinese people have bought apartments, but European immigrants, and Black people, when they apply have been accepted if they meet the financial requirements, plan to live in the apartment and not use it as a rental, and we limit shareholders to owning two apartments.

In terms of financial disclosure, as mentioned above, we often have a wish list of the projects we would like to accomplish each year, and most of them remain on the wish list, often for years, until money becomes available or the project becomes absolutely essential. Examples include repaving our parking lot, upgrading our elevators, replacing pipes and antiquated plumbing and heating systems. Presently we share the required financial documents. To have to share every item we are even contemplating is absurd. Also, shareholders are not told who or how many people are behind on their maintenance. That is private information only available to management and the Board. To share that information with potential buyers is completely unreasonable and seriously problematic.

In order to comply with the laws proposed, the Board would have to change our by-laws to make sure Board members are protected from litigation, which would increase our costs and raise our insurance costs, if we could even find a company that would insure us for the kinds of litigation we would be exposed to. This would make our building less appealing to buyers. We already have many obstacles facing the sale of our apartments since it is located on Park Row, which is considered by NYPD to be their "campus" and places all kinds of restrictions on our comings and goings and that of our guests. We do NOT need any more red tape.

In terms of meeting the 45-day requirement in bill 1120A. We do our best to complete sales applications within 30 days. However, there are times when the paperwork is not accurate or complete, or where people have made claims that are unverifiable, or don't quite meet our financial requirements and we are trying to help them find a way. When those kinds of things happen, it sometimes takes longer to get through the process. We are volunteers, donating our time and expertise, and we cannot always fit in extra meetings. We have created an empowered subcommittee to speed the process as much as possible and even allow votes on zoom to approve applicants between Board meetings. Holding us to 45 days and then automatically giving the right to an applicant to buy, is simply unfair and would likely result in less willingness to help the applicant meet our requirements when there is an issue and we would have been inclined to assist. In my experience co-op owners are as eager to complete a sale as applicants are. No need to put extra pressure on us.

Thank you for considering my thoughts and weighing them as these bills are considered.

Sincerely,

Lucy West

President

Chatham Green, Inc.

185 Park Row

NY, NY 10038

C
G
C

Clearview Gardens
FIRST THROUGH SIXTH CORPS.
160-70 WILLETS POINT BLVD.
P.O. Box 570337
WHITESTONE, N.Y. 1 1357-0337

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Clearview Gardens Corporations, we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Clearview Gardens Corporations is a long-established cooperative community in Whitestone, Queens, founded on principles of fairness, shared responsibility, and community trust. We have nearly 2,000 units of affordable middle and working class housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of

middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Clearview Gardens respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Michael Kurtz
President, Clearview Gardens Board of Directors

December 2nd 2025

COHABS

Written Testimony on Shared Housing

To: Eric Bottcher, New York City Council

From: Cohabs: Daniel Clark (Managing Director), James Grasso (Senior Director)

Cohabs is a global co-living developer and operator that has been active in New York City since 2018. We are currently the largest owner of co-living bedrooms in the city, with more than 700 rooms either operational or in development. Our mission is to provide high-quality, community-oriented housing for New Yorkers who cannot afford luxury rents or do not have access to the traditional roommate market.

We strongly support the Council's leadership in advancing new Shared Housing legislation. We see every day how unaffordable New York has become, especially for younger residents and working professionals who do not qualify for subsidized housing yet cannot afford studios or one-bedroom units. Co-living has allowed us to restore and activate underutilized, often abandoned pre-war buildings and convert them into safe, community-driven, high-density housing at accessible price points.

As operators working directly with these buildings, we also want to ensure that the regulatory framework is achievable for adaptive reuse projects. Many of the buildings we acquire are pre-war structures with limited light, air, and depth. Co-living is also considered a niche asset class, which makes both equity and debt financing more complex and increases the required feasibility thresholds. With that in mind, we respectfully offer three recommendations:

1. Minimum bedroom size of 100 SF. *We believe minimum room sizes should be aligned with the underlying building classification in the Multiple Dwelling Law. Allowing modest flexibility for pre-war buildings would enable higher density, lower construction cost per room, and more affordable rents. Many historic buildings simply cannot achieve Appendix T proportions without dramatic, economically prohibitive alterations.*
2. 1 Kitchette for every 3 bedrooms. In most pre-war buildings, it is physically impossible to place one kitchen or kitchenette for every three bedrooms while meeting light, air, and egress requirements. This ratio also substantially increases construction costs and reduces feasibility for adaptive reuse. We respectfully recommend allowing **up to 10 bedrooms per kitchen/kitchenette**, paired with increased minimum kitchen size and ventilation standards to maintain safety. This would ensure quality while preserving the economic viability of conversions.
3. Restricting Frame buildings from the program. Many small townhouse-scale buildings—often vacant or distressed—are frame buildings. Excluding them removes a significant portion of the small-building inventory that could otherwise be adaptively reused for shared housing. We encourage the Council to consider a performance-based path that allows frame buildings to participate if they can meet enhanced fire-safety requirements
4. The report does not address rent regulation. If there were to be a single lease per each shared housing unit, each building would have to contain a maximum of 5 units to stay out of rent stabilization in any building built prior to 1974. There would have to be some type of exemption in order for us to continue to operate.

   We would love to set up a meeting to discuss these concerns further, tour you through our buildings and have you talk to our tenants directly.

Kindest regards,

Cohabs

DEEPDALE Gardens
Since 1953

249-31 61st Avenue, Little Neck, New York 11362 • (718) 428-6011 • Fax (718) 428-8110

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Deepdale Gardens Corporations, we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Deepdale Gardens is a long-established cooperative community in Queens, founded on principles of fairness, shared responsibility, and community trust. We have 1,396 units of affordable middle-class and working-class housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Deepdale Gardens respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Deepdale Gardens Corporations

BY

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: Re: Opposition to Intro 407, Intro 438, and Intro 1120 ("Co-op Transparency Package")
Date: Monday, November 17, 2025 1:30:11 PM

From: liz pike [redacted]
Sent: Monday, November 17, 2025 1:28 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>; District14 <District14@council.nyc.gov>; gethelp@advocate.nyc.gov; District18 <District18@council.nyc.gov>
Subject: [EXTERNAL] Re: Opposition to Intro 407, Intro 438, and Intro 1120 ("Co-op Transparency Package")

[redacted]

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Ana Sanchez, Chair, Committee on Housing and Buildings
The Honorable Jumaane D. Williams, Public Advocate
The Honorable Amanda Farias, Majority Leader
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407, Intro 438, and Intro 1120 ("Co-op Transparency Package")

Dear Speaker Adams, Chair Sanchez, Public Advocate Williams, Majority Leader Farias, and Members of the New York City Council,

I am writing on behalf of the Board of 70 E 96th St, a cooperative residential community in Carnegie Hill, Manhattan, to express our strong opposition to the package of bills currently before the Committee, Intro 407 ("The Reasons Bill"), Intro 438, and Intro 1120, which would place onerous and unnecessary procedural burdens on cooperative housing corporations across New York City.

While we appreciate the Council's intent to promote transparency, these proposals would have damaging unintended consequences for thousands of volunteer-run co-op boards that already operate under stringent anti-discrimination laws at the city, state, and federal levels.

Why These Bills Are Misguided

- Intro 407 would require sworn, detailed explanations for any rejected purchase application, exposing volunteer board members to personal liability and creating a roadmap for costly litigation

- Intro 438 would compel disclosure of sensitive building financial information to prospective purchasers, potentially misrepresenting a building's financial health and violating confidentiality norms.

- Intro 1120 would impose rigid timeframes and "deemed consent" provisions that ignore the realities of volunteer governance and seasonal scheduling.

The Broader Impact

Cooperative housing has long been one of New York City's most stable and affordable ownership models, providing homes for hundreds of thousands of residents. These volunteer boards, neighbors serving neighbors, devote significant unpaid time to managing building finances, maintenance, and resident well-being. By treating them as potential wrongdoers rather than community stewards, the proposed legislation would discourage participation and increase costs for all shareholders.

Our Request

We urge the Council to reject Intros 407, 438, and 1120 and to engage directly with co-op boards, management professionals, and civic leaders to craft policies that balance transparency with practical governance. We believe collaboration, not punitive regulation, is the best path forward to support New York's cooperative communities.

Thank you

Elizabeth Pike Brookman
Director, Admission Committee
Board of Directors
70 E 96th St
New York, NY 10128

Subject: Opposition to Intros 407, 438 & 1120 – “Co-op Transparency Package”

Dear Chair Sanchez and Members of the Committee,

On behalf of the Board of 70 E 96th in Carnegie Hill, Manhattan, we respectfully submit this testimony in opposition to Intros 407, 438, and 1120.

While intended to promote transparency, these bills would impose punitive procedural burdens on volunteer co-op boards, expose them to unnecessary litigation, and increase costs for residents. Co-ops already comply with extensive anti-discrimination laws; these measures would not improve fairness but would discourage participation and weaken good governance.

We urge the Council to reject these bills and instead collaborate with co-op boards and housing professionals on balanced policies that preserve transparency without undermining community-based ownership.

Thank you for your consideration.

Patricia Preston
President, Board of Directors
70 E 96th St
[redacted]

November 10, 2025

Subject: Written testimony for Council hearing on 11/13 re Ints 407, 438 and 1120-A

Hello, all,

I don't know how to submit written testimony to the City Council so I am submitting it here. If I need to do something else, please advise.

Dear City Council Members,

I am writing in my capacity as President of 310 East 49th Corporation, as well as a 20 year shareholder. Professionally I have previously been Treasurer of a publicly-traded leasing company and CFO of a privately-held finance company. I am shocked and dismayed by this troika of proposals regarding the application/approval process for co-op apartments: Int 407, Int 438 and Int 1120-A.

With my professional background in finance and both public and private corporations, I understand very well the differences between them as well as how a residential co-operative corporation differs from any other type of corporation. First, a publicly-held corporation has no control over who is a shareholder - open market transactions are available to anyone, subject to public disclosure only once a certain ownership level is attained. A privately-held corporation has full control over the selling of new shares to an investor and typically limits the sale or transfer of existing shares to a third party, with most concern about transfer to a competitor or an investor having an agenda with which existing shareholders do not agree. Private residential co-operative corporations similarly seek to limit the sale or transfer of shares to contrarian parties but have the added concern that any new shareholder will be their neighbor, living among them. All 3 types of corporations are subject to all anti-discrimination laws.

Int 407 requiring disclosure of a specific rationale for decisions not to approve a sale seems designed only to open more pathways for litigation, which may be frivolous or in bad faith. Board members for co-ops are volunteers but we are also shareholders ourselves and have duties to our neighbors/shareholders. There are so many ways I can think of that this proposal may cause havoc and I cannot conceive of a "problem" that it is designed to cure. Both a selling shareholder and a prospective buyer have remedies under existing laws if either (or both) feels that a decision was made in bad faith or on discriminatory basis.

Int 438 is just mind boggling. Interim financial information is not disclosed by any corporation simply because it is unverified! Existing and prospective shareholders need to make financial decisions based on accurate information. People make mistakes - information may be inputted in error; something may be inadvertently omitted or double counted, etc. That's why multiple people review interim statements and audits are undertaken at year end before the information is distributed to shareholders. I cannot fathom what benefit the sponsors of this proposal expect from it.

Int 1120-A attempts to put every application for the purchase of home real estate - which is typically the largest and most consequential purchase anyone makes - into a "one-size fits all" timeline. Each such transaction is idiosyncratic. Our building is 75% studio apartments and the buyers run the gamut from young first time buyers to retirees looking for a NYC pied a terre (we do not allow strictly investment purchases). I review all of our applications. They are voluminous and quite often people are confused by the instructions. Questions are asked; revisions are made when necessary. Again, this is a consequential transaction for all parties. It should not be done in haste or according to a mandated arbitrary timeline.

Please reject all of these proposals.

Best regards,

Alison Mason
President
310 East 49th Corporation

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")
Date: Sunday, November 16, 2025 2:29:14 PM

From: Deborah Doyle <doyle230e50@gmail.com>
Sent: Sunday, November 16, 2025 2:12 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

[redacted]

Dear Speaker Adams,

I am in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.

- Create a roadmap for litigation by requiring written “reasons” for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Deborah Doyle
Board Secretary
230 East 50th Street NY,NY
10022

The Honorable Adrienne Adams, Speaker

The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings

New York City Council

City Hall

New York, NY 10007

Re: Testimony in Opposition to Intro 407 (“The Reasons Bill”)

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A Call to Appear and Be Heard

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Very truly yours,

Wendy Belzberg

Vice President, 115 East 67th Street

E·R·A·S·E

EDUCATION RESEARCH ADVOCACY & SUPPORT TO ELIMINATE RACISM

November 25, 2025

Testimony of Elaine Gross on behalf of ERASE Racism for
Dec. 2, 2025 hearing of Committee on Housing & Buildings

I'm Elaine Gross, the Founder of ERASE Racism. My organization has focused on Long Island but has led and participated in region-wide and state-wide efforts to fight housing discrimination and housing segregation.

I regret not being able to testify in person in support of the coop disclosure bill, the current version of which is Intro 407. ERASE Racism has long supported coop disclosure, and we are both disappointed and perplexed by the ability of a small but highly influential group of coop board members, aided by their attorneys and consultants, have managed for well over a decade to stymy common-sense legislation that is so clearly in the public interest, is supported by the public, and is supported by coop residents who are not board members.

The coop industry is not subtle: it has used secrecy and wants to be able to continue to use secrecy to preserve board-member unaccountability and privilege. Progressive legislative bodies do not tolerate the elevation of self-interest over public interest in other contexts; the Council needs to stop tolerating it at the behest of coop boards.

Despite the cries of the industry that transparency would be a catastrophe – which, when you think about it is a remarkable admission: we're sunk if you know why we make our decisions – I can report that, when Westchester, Nassau, and Suffolk Counties each passed (or, in the case of Westchester, passed and then strengthened) versions of a coop disclosure law, the sky did not fall.

In real life, people are not spending all their time seeking to file baseless lawsuits; what they're interested in most is finding a home. If it turns out that discrimination has played a role in denying them a home, *they should be able to fight back.* It isn't hard to realize why coop boards want to maintain secrecy. Even before people apply, that lack of transparency gives real estate brokers an incentive not to take applicants – especially applicants who don't demographically "fit" the existing building profile – to listings that they perceive as having a risk of not working out. Applicants themselves are deterred by a process that can have them turned down – after months of work – with absolutely no explanation.

6800 Jericho Turnpike, Suite 109W, Syosset, NY 11791-4401
Voice 516-921-4863 • Fax 516-921-4866 • www.eraseracismny.org • info@eraseracismny.org

Then, of course, those who do apply and who are turned down without a reason have no way to assess what has happened, including whether or not they have been illegally discriminated against. **Under current law, coops, unlike other entities involved in the sale of housing, cannot be "tested" to determine if someone seeking housing has been turned down based on their membership in a protected class. That is why there are relatively few cases filed, not that coop boards are uniquely virtuous.** (The continued existence of discrimination by coop boards is reconfirmed in news reports every few years).

As others will surely mention, compliance with Intro 407 is simple.

And, contrary to the scare tactics that have been employed, Intro 407 does not invite an inquiry into whether a coop's reasons are "good" reasons. If a coop's statement says only that the board believed that the applicant would not be an active shareholder, that's not specific enough. But let's say a board's statement conveys that it acted because the applicant indicated that he or she was not willing to volunteer time to help tend the coop's garden.

Some eyebrows might be raised and that reason could be assessed for whether it was a pretext, but the "provide reasons" part of Intro 407 itself is satisfied. To reiterate: if that was the only reason of all those who participated, and the coop has timely and specifically set it out in a written statement to the appalicant, Intro 407 does not provide for a cause of action asking a judge whether the coop *should* have that standard.

In terms of increasing the effectiveness of existing housing discrimination law, it is a big improvement over other coop disclosure legislation. This bill explicitly limits the justifications that can be used if a discrimination case is later brought, to those contained in the timely statement the legislation demands. (Remember: coop boards know every reason for rejection at the time the rejection is made. They just made it!)

There is no reason to allow *post hoc* (after the fact) reasons created by discrimination-defense attorneys to muddy the waters.

Moreover, to the extent that coop representatives may advise their clients to have a kitchen-sink-full of reasons, those representatives are steering their clients wrong. Every reason given will be able to be assessed, and, once some reasons given are false, a jury is entitled to conclude that the coop's defense in a later fair housing action is not credible.

I strongly urge the passage of Intro 407.

GEORGETOWN MEWS OWNERS CORP
69-17 150TH STREET
KEW GARDEN HILLS, NY 11367

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Georgetown Mews Owners Corp. we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Georgetown Mews Owners Corp. is a long-established cooperative community in Flushing, Queens, founded on principles of fairness, shared responsibility, and community trust. We have over 900 units of affordable middle and working class housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation

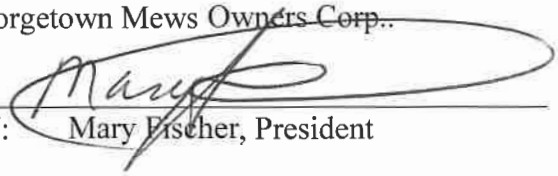
with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Georgetown Mews respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Georgetown Mews Owners Corp..



BY: Mary Fischer, President

Testimony by Bob Friedrich, President - Glen Oaks Village Co-op (12-2-25) 3 min

I am President of Glen Oaks Village and co-president of the Presidents Co-op & Condo Council representing Presidents of the largest co-ops in NY. **We advocate for Co-op Justice.**

Volunteer Board Members are elected by co-op shareholders and many serve on local civic associations and Community boards. They are in the business of **approving new residents, not rejecting them**.

Intro 407, requiring **"Reasons for Rejection"** will end admissions flexibility for ALL applicants. Buyers whose financials are borderline, will no longer benefit from a co-op's willingness to get them over the hump by offering flexibility in the admissions process.

Whether it's accepting an applicant's credit score that is slightly below the co-op's requirement or permitting a co-signer to push the application across the finish line, flexibility will end as treating one applicant slightly different than another would expose the co-op to costly and punitive litigation, making it impossible **to get vulnerable applicants to YES instead of NO.**

Intro 407 was introduced because of perceived discrimination in co-op housing. Let's be clear, for discrimination to actually exist, 3 extraordinary conditions have to take place, simultaneously:

1. Co-op owners would have to elect a majority of inherently dishonest individuals to their Board, which means a typical co-op Board of 9 would require 5 colluding board members to break the law and discriminate.
2. The Co-op's Management Company would have to be part of the law-breaking cabal, and
3. All of these participants having a fiduciary responsibility to act in a lawful manner would have to bring the co-op's attorney into the ring of complicity and collusion to achieve this unlawful applicant denial.

This hierarchy of checks and balances in a co-op is why there is no actual evidence of systemic discrimination in co-ops.

Intro 407, **threatens the very housing access you seek to protect,** and
Harms the very applicants you are trying to help.

Losing flexibility in the admissions process will mean the difference between rejection and acceptance for many vulnerable applicants, and for them, I urge you to reject this misguided bill in the name of **Co-op Justice**.

Thank you.
Bob Friedrich

Written Testimony – Goddard Riverside Community Center

New York City Council

Joint Hearing of the Committee on Housing and Buildings

December 4, 2025

Goddard Riverside is a settlement house whose mission is to ensure community members across the life course have the resources they need to choose lives of dignity and care, providing services that include keeping New Yorkers in their homes, feeding homebound older adults, creating career pathways for youth, engaging street homeless neighbors and much more. Across our 30+ sites in Manhattan and Queens, we serve over 24,000 New Yorkers a year. Thank you to Chair Sanchez, Speaker Adams, and the New York City Council Committee on Housing and Buildings for the opportunity to submit testimony on Intro 1475-2025 (Bottcher).

Goddard Riverside has a long history with single room occupancy (SRO) and shared housing provision and advocacy in New York City. Goddard was a key member of SRO Tenants Rights coalition in the 1970s and opened the Goddard Riverside SRO Law Project in 1981 to preserve such housing and to safeguard tenants and prevent homelessness. Goddard Riverside provided leadership in developing what is now known as Supportive Housing by acquiring Capitol Hall, a 200-unit SRO in 1984, and bringing in social service workers on site to work with the residents and maintain the building. After additional nonprofits also acquired SRO buildings, we hosted the "SRO Provider Group", which grew and later spun off to become the Supportive Housing Network of New York (SHNNY).[1] Our most recent site, the Stephan Russo Residence on West 107th Street, offers dozens of high-quality, permanent supportive housing units and affordable SRO units with private bathrooms to low-income renters.

We are supportive of Intro 1475-2025, and thank Council Member Bottcher and his team, as well as the Department of Housing Preservation and Development, for their work and interest in expanding access to well-regulated SRO housing in New York City. We agree that there is a need for more affordable SRO units, and many housing advocates have long called for such a revival of their production with a reexamination of the appropriate building codes and unit sizes.

We appreciate that the minimum sizes for such units in this bill are 20% higher than originally permitted in decades past for units meant for single or for two occupants. The current legislation also reduces the ratio of tenants to bathrooms to at most 3:1, as compared to the old standard of 4:1 or 6:1 depending on the type of SRO. We would strongly encourage the Council to narrow that ratio down to ideally one bathroom to one unit (up to two tenants per

[1] Please see this short video for more info: https://www.youtube.com/watch?v=fLwQtrEb5X4.

unit). . From our work with and alongside SRO tenants over the years, we have seen firsthand that in SRO housing, having many tenants share one bathroom can be a source of tension between tenants and is more difficult for management to maintain. Further in our experience as supportive housing providers, SRO units with shared bathrooms tend to remain vacant longer, as potential tenants hold out for placement in units that have private bathrooms. While reducing the ratio may result in higher construction costs, we urge the Council and administration to look at all avenues to ensure the housing can remain as affordable as possible, while remaining attractive enough for future tenants. .

We also support creating shared common space, kitchen, and bathrooms in a single suite rather than open to any residents in the building. This would allow for more privacy and would also allow the suite to be easily turned into an apartment for a larger family if there was such a future need.

In addition, it is unclear based on the legislative language whether the priority for this bill is to incentivize SRO development in just the private for-profit sector through office conversions and new construction. We would welcome more opportunities for nonprofit housing developers, especially in the Supportive Housing space, to collaborate with HPD to explore new models for SRO production that appropriately respond to the needs of those we serve.

Finally, in investing in the shared housing roadmap, we encourage the Council and the next administration to expand funding for housing vouchers citywide, including any additional expansion in SRO housing.

Thank you for your time and consideration. We are available for discussion about any of these points, as well as our experience of developing and providing high quality SRO housing and appreciate your attention to this important issue.

GRACIE TERRACE APARTMENT CORP.
605 EAST 82nd STREET
NEW YORK, NY 10028

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.

- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

s/David Rimmer

s/Kimball Lane

s/Darren Littlejohn

s/Ellie Smith

s/Claudia Ullman

s/Yakov Weinstein

s/Marissa Bianco Wych

Gracie Terrace Apartment Corp.

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: Testimony in Opposition to Intro 407 ("The Reasons Bill")
Date: Sunday, November 23, 2025 6:49:13 PM

From: Francesco [redacted]
Sent: Sunday, November 23, 2025 6:20 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Cc: District14 <District14@council.nyc.gov>; Meg Goble [redacted] James Koster <president@75livingston.net>
Subject: [EXTERNAL] Testimony in Opposition to Intro 407 ("The Reasons Bill")

[redacted]

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The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

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Very truly yours,

Francesco Meloni, Treasurer

Heights 75 Owners Corp
75 Livingston Street
Brooklyn, NY 11201

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] OPPOSITION TO "THE REASONS BILL"
Date: Friday, November 14, 2025 8:00:44 PM

From: Erica Noy <algiersboard@gmail.com>
Sent: Friday, November 14, 2025 7:05 PM
To: district14@coucil.nyc.gov; gethelp@advocate.nyc.gov; Dinowitz, Eric <EDinowitz@council.nyc.gov>; Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] OPPOSITION TO "THE REASONS BILL"

[redacted]

3616 Henry Hudson Parkway Owners Corp.

3616 Henry Hudson Parkway
Riverdale, NY 10463

November 14, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

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Why Intro 407 Is Misguided

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Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the c

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Erica Noy

President

3616 Henry Hudson Parkway Owners Corp.

3616 Henry Hudson Parkway

Riverdale, NY 10463

Please confirm receipt of email. Thank you

Erica Noy
President
3616 Henry Hudson Pkwy Corp.

HILLTOP VILLAGE COOPERATIVE # 4, INC.
87-50 204TH STREET
HOLLIS, NEW YORK 11423

November 20, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Hilltop Village Cooperative #4, Inc., we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Hilltop Village Cooperative #4, Inc., is a long-established cooperative housing community in Hollis, Queens, founded on principles of fairness, shared responsibility, and community trust. We have 296 units of Cooperative housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

NYC and NYS already have departments and agencies which address claims for discrimination in housing in violation of law and which impose fines and penalties after open and fair hearings. Your proposed legislation eliminates a board's right to due process under these laws.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along

to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Hilltop Village Cooperative #4, Inc., respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Hilltop Village Cooperative #4, Inc.

By: _____
Pamela Harris, President

HILLTOP VILLAGE COOPERATIVE # ONE, INC.
87-50 204TH STREET
HOLLIS, NEW YORK 11423

November 20, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Hilltop Village Cooperative # One, Inc., we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Hilltop Village Cooperative # One, Inc., is a long-established cooperative housing community in Hollis, Queens, founded on principles of fairness, shared responsibility, and community trust. We have 200 units of Cooperative housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

NYC and NYS already have departments and agencies which address claims for discrimination in housing in violation of law and which impose fines and penalties after open and fair hearings. Your proposed legislation eliminates a board's right to due process under these laws.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along

to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Hilltop Village Cooperative # One, Inc., respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Hilltop Village Cooperative # One, Inc.

By: Mohamed Omar
Mohammed Omar, President

HILLTOP VILLAGE COOPERATIVE # TWO, INC.
87-50 204TH STREET
HOLLIS, NEW YORK 11423

November 20, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Hilltop Village Cooperative # Two, Inc., we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Hilltop Village Cooperative # Two, Inc., is a long-established cooperative housing community in Hollis, Queens, founded on principles of fairness, shared responsibility, and community trust. We have 200 units of Cooperative housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

NYC and NYS already have departments and agencies which address claims for discrimination in housing in violation of law and which impose fines and penalties after open and fair hearings. Your proposed legislation eliminates a board's right to due process under these laws.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along

to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Hilltop Village Cooperative # Two, Inc., respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Hilltop Village Cooperative # Two, Inc.

By: Mary L. Boyd Foy
Mary L. Boyd Foy, President

HILLTOP VILLAGE COOPERATIVE # THREE, INC.
87-50 204TH STREET
HOLLIS, NEW YORK 11423

November 20, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Hilltop Village Cooperative # Three, Inc., we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Hilltop Village Cooperative # Three, Inc., is a long-established cooperative housing community in Hollis, Queens, founded on principles of fairness, shared responsibility, and community trust. We have 200 units of Cooperative housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

NYC and NYS already have departments and agencies which address claims for discrimination in housing in violation of law and which impose fines and penalties after open and fair hearings. Your proposed legislation eliminates a board's right to due process under these laws.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along

to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Hilltop Village Cooperative # Three, Inc., respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Hilltop Village Cooperative # Three, Inc.

By: _____
Gary Coger, President

750 KAPPOCK APARTMENTS CORPORATION
750 KAPPOCK STREET, BRONX

Testimony to the New York City Council
Committee on Housing and Buildings

Comments on Int 407, Int 438, Int 1120-A
November 13, 2025

Thank you, chair Sanchez, and members of the committee for the opportunity to submit this written testimony. My name is John Bates, and I am a board member and board secretary of 750 Kappock Apartments Corp, a cooperative with about 150 apartments in Spuyten Duyvil, the Bronx. I have served on my board for 1 year and have lived in my cooperative for 2-1/2 years.

On behalf of the Board of Directors of 750 Kappock, I want to express our opposition to all three bills under consideration. I will confine my written remarks to Intro 407, which would require cooperative housing boards to issue detailed written explanations for any rejected applications. Our opposition extends to all three bills, however, as we view all three in their current form as being detrimental to the governance of cooperative housing and largely for similar reasons.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended – but entirely foreseeable – consequences that threaten the stability and affordability of cooperative housing. In effect, in our opinion, the bill impedes the Board member's duty of exercising best judgment on behalf of the entire body of shareholders. It does so both by exposing the individual volunteer Board member to potential personal liability for highly sensitive decisions made on admissions, and by imposing on the Board as a whole an ever greater burden of explanation, justification, and the threat of potential litigation. Co-ops will experience higher legal fees, administrative costs, and insurance premiums.

I will make three supporting points, based on my own Board experience.

First, we give close and serious attention to each purchase application. We consider the applicants' financial capacity as well as their ability to meet our

policies, standards, and requirements – all of which are in place to encourage responsibility, comity, and financial stability in our community. Our discussions deal with sensitive personal matters and are therefore necessarily confidential, for our protection and for the protection of the applicants. Under the provisions of Intro 407, how could we – without violating confidentiality – reasonably describe those areas of an application that we find deficient without incurring potential liability if challenged.

Second, in fact, our application forms and process – which I believe are industry standard – are transparent. Applicants can readily perceive the criteria on which their applications are being considered, giving advance clarity and rationale for the decisions, positive or not, that are going to be made on their candidacy. Needless to say, those criteria are heavily weighted toward financial factors, which must guide the Board's decisions under our duty of fiduciary responsibility.

Finally, on a personal note, I came to the city from Boston just 2-1/2 years ago. Co-op living was an entirely new experience for us! And yet I expressed my candidacy for election to the Board after only 1 year here. It was clear that the co-op had been having trouble recruiting new Board members, and I felt I had a responsibility to pitch in. Frankly, I would not have joined the Board had the provisions of Intro 407 been in effect, as I could not have accepted the potential personal liability that I would then have incurred. I believe these provisions will quickly prove to be a severe deterrent to Board recruitment, to the severe detriment of co-op governance throughout the city.

In my exposure to co-op life and governance, I have come to appreciate what an important force co-ops represent in the life of our city. At a time when the affordability of housing has risen to the top of our urban concerns, co-ops offer a proven model of affordability for many. This stems from the structure of home ownership and volunteer governance by fellow shareholders. That structure deserves to be protected and indeed strengthened. Intro 407 would have quite the opposite effect, with harm to the large and diverse communities that thrive in housing cooperatives today.

On behalf of the Board of 750 Kappock, in the Bronx, I respectfully urge the New York City Council to reject Intro 407, Intro 438 and Intro 1120-A.

THE KENNEDY HOUSE LUXURY RESIDENCES

110-11 Queens Blvd
Forest Hills, NY 11375

718 268 3080
office@kho.nyc

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

I respectfully submit this testimony to oppose Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

As a coop owner, I know that co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health. Coops have been one of New York City's most successful and stable models of homeownership, providing affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers—*like me*.

I appreciate the Council's intent to promote transparency. However, I strongly believe Intro 407 is misguided and would cause severe unintended harm.

This bill **wrongly assumes** that co-op boards act with bias or discrimination. That is both unfounded and unfair.

The overwhelming preponderance of 1,000s of honestly, prudently and ethically managed coops is proof. If there is a rare case, housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

1.Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.

2.Encourage frivolous and costly lawsuits by merely unhappy buyers.

3.Drive up our insurance premiums, further straining the affordability of co-op living.

4.Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.

THE KENNEDY HOUSE LUXURY RESIDENCES

110-11 Queens Blvd
Forest Hills, NY 11375

718 268 3080
office@kho.nyc

5.Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced *very necessary* volunteer participation, and weakened governance of our coop—and thousands of co-op buildings throughout the city.

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations, including me.

I urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

New York City will be the beneficiary.

Respectfully submitted,

Steve Carbone, President 11/17/2025
Kennedy House Owners, Inc
110-11 Queens Boulevard
Forest Hills, NY 11375

November 20, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.

- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Carol Ann Quercia

Carol Ann Quercia
President
Kings Oliver Owners, Inc.

North Shore Towers and Country Club
27240 Grand Central Parkway
Floral Park, NY 11005
Phone: 718-423-3335

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of North Shore Towers Apartments Incorporated we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

North Shore Towers Apartments Incorporated is a long-established cooperative community in Floral Park, NY, founded on principles of fairness, shared responsibility, and community trust. We have over 1,800 units of Cooperative housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with

confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of North Shore Towers Apartments Incorporated respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
North Shore Towers Apartments Incorporated.

Martin Schwartzman
BY

Outpost

Welcome Home.

Outpost Holdings Inc
450 Fashion ave STE 2309
New York NY 10123
+1-833-707-6611

Testimony on Shared Housing Legislation

Submitted to:
The Honorable Erik Bottcher
Chair, New York City Council Committee on Housing and Buildings

Re: Hearing on Shared Housing

Dear Council Member Bottcher and Members of the Committee,

First, I want to commend you and your colleagues for recognizing *shared housing* as an essential component in addressing New York City's affordability crisis. For decades, shared living arrangements have been a cornerstone of how New Yorkers make this city livable — particularly for young professionals, students, and essential workers.

I am here on behalf of **Outpost, June Homes, and its subsidiaries**, which collectively **manage more than 4,000 housing units across the United States, including approximately 2,500 in New York City**. For over a decade, Outpost has built a reputation for providing **safe, high-quality, and affordable housing** options that are deeply valued by our residents. Thousands of New Yorkers have relied on our homes as stepping stones in their careers and education, and our tenant satisfaction and renewal rates reflect the trust and recognition we've earned in this space.

While we fully support the Council's goal of establishing a clear framework for shared housing, we are concerned that, as currently drafted, several provisions of the proposed legislation may unintentionally restrict — rather than enable — the very types of housing options that help alleviate the affordability crisis.

Shared housing is not a new or experimental concept. Roughly **40% of New York City households** are roommate shares. This model has long served as a practical, market-based response to the city's high housing costs. With today's technology — from roommate-matching platforms to flexible lease management systems — shared housing is safer, more transparent, and more efficient than ever before.

Outpost

Welcome Home.

Outpost Holdings Inc
450 Fashion ave STE 2309
New York NY 10123
+1-833-707-6611

However, the current draft legislation introduces several requirements that would discourage both property owners and developers from participating in shared housing programs. A few key concerns include:

1. **Exclusion of Framed Dwellings (#4):**
   Prohibiting shared housing in framed buildings overlooks the fact that many of these properties already contain multi-bedroom, code-compliant units safely occupied by roommate households. These buildings already meet all fire and life safety standards under the Multiple Dwelling Law.

2. **Mandatory Cleaning Requirements (#5):**
   Requiring owners to provide cleaning services for common areas removes flexibility and increases costs. Cleaning arrangements should remain a *market-driven decision* between owners and tenants. Many residents prefer to reduce their expenses by maintaining their own shared spaces.

3. **Increased Minimum Bedroom Sizes (#7):**
   The proposed bedroom size minimums exceed those required under the Multiple Dwelling Law. As long as health and safety codes are met, unit layout and bedroom sizes should remain a matter of consumer choice and market demand.

4. **Limitations on Bedroom Count:**
   Apartments with four or more bedrooms are among the most cost-efficient housing options, reducing rent per person and expanding access for working New Yorkers. Restricting bedroom counts would directly undermine affordability — the very goal this legislation seeks to achieve.

In summary, while we applaud the Council's intent to create a framework that legitimizes and supports shared housing, we urge the Committee to ensure that the final version of this bill promotes *flexibility, affordability, and growth* rather than imposing additional restrictions. Shared housing has already proven to be one of the city's most effective affordability tools. With thoughtful policy adjustments, it can become an even stronger part of New York's housing solution.

Outpost

Welcome Home.

Outpost Holdings Inc
450 Fashion ave STE 2309
New York NY 10123
+1-833-707-6611

Thank you for your leadership and for the opportunity to provide testimony today. Outpost stands ready to work with the Council and the administration to help refine this legislation and ensure shared housing continues to serve New Yorkers safely, affordably, and effectively.

By: **Outpost Holdings**

……

Sergii Starostin, CEO

Date: December 1 2025

The Board of Prospect Hill Co-operative
333 East 41st Street
NY, NY 10017

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
    - Our insurance premiums have risen 25%-40% ANNUALLY over the past four years. This is unsustainable. (See addendum)
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Elise M. Wagner, Vice President
Prospect Hill Corporation
[redacted]
NY, NY 10017

Addendum; Building insurance costs

	22/23	23/24	24/25	25/26
COMMERCIAL PACKAGE	$18,476.00	$25,840.00	$38,742.00	$57,257.00
UMBRELLA COVERAGE ($50 MIL)	$14,375.00	$15,128.00	$16,427.00	$21,085.00
TOTAL	$32,851.00	$40,968.00	$55,169.00	$78,342.00

Queensview, Inc.

21-66 33rd Road
Long Island City, NY 11106
Tel: 718-728-5090
Email: board@queensvw.com

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of Queensview Inc., we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

Queensview Inc. is a long-established cooperative community in Long Island City/Astoria, Queens, founded on principles of fairness, shared responsibility, and community trust. We have over 700 units of affordable middle and working class housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Queensview, Inc. respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
Queensview Inc.

BY

New York City Council
Committee on Housing and Buildings
Attn: Committee Chair and Members
New York City Hall
250 Broadway
New York, NY 10007

Re: Testimony on Shared Housing Legislation

Dear Chair and Members of the Committee,

My name is Or Goldschmidt, and I am the CEO of Roomors Living, Inc. We manage shared apartments across New York City, and every day we interact with the people who depend on these homes—young professionals, new graduates, service workers, and countless others who want to be part of this city but cannot afford a traditional studio or one-bedroom.

I want to begin by recognizing Council Member Bottcher and this Committee for elevating shared housing as a real part of the affordability conversation. This is overdue. Shared living is one of the oldest and most common housing solutions in New York, and for a large portion of renters, it is the only workable path to staying here.

That said, after reviewing the current proposal, I am concerned that several provisions—while clearly well-meant—may unintentionally shrink the supply of shared housing or complicate its operation in ways that reduce affordability.

Shared living has evolved dramatically in recent years. Many renters today meet their roommates online, move in on different timelines, and expect to have their own financial and lease arrangements. Technology now supports this: digital onboarding, background checks, roommate matching, and flexible lease adjustments are all common. The regulatory framework needs to support this reality rather than restrict it.

Several aspects of the proposal would make that difficult.

First, the blanket restriction on certain building types—even those that already comply with state safety requirements—would remove a huge amount of existing, functioning shared housing from the market. Many older walk-ups and pre-war buildings have housed multi-bedroom households for generations. They meet the codes we rely on today. Excluding them would significantly reduce the supply of legal, safe homes without evidence that they pose new risks.

Second, mandating that owners provide cleaning services in shared apartments adds cost without necessarily enhancing safety or quality of life. In our experience, many residents prefer lower rents and are comfortable maintaining shared areas themselves. A fixed requirement eliminates choice and increases operating costs that ultimately get passed on to renters.

Third, introducing new bedroom-size rules that exceed established state standards will sideline many perfectly legal homes. If rooms already meet health and safety requirements, layering on additional size thresholds only reduces the number of units that can be offered at price points young renters can afford.

Finally, limiting larger shared apartments—those with four, five, or more bedrooms—would be counterproductive. These layouts often deliver the lowest per-person rents in the entire market. Removing or discouraging them eliminates one of the few naturally affordable options left in the city.

My broader concern is that if the path to legal shared housing becomes too narrow or expensive, owners will simply avoid participating in the program altogether. At that point, shared living doesn't disappear—it just becomes informal again, with fewer protections for tenants. The City has an opportunity to bring more of this activity into the light. The rules must be flexible enough to make that a realistic choice.

I appreciate the Council's commitment to confronting New York's affordability crisis and your willingness to consider new models. I respectfully urge the Committee to ensure that the final legislation maintains safety while avoiding new barriers that would reduce supply or limit participation. Shared housing is one of the few tools that can move quickly and affordably to meet today's needs—so long as it is allowed to function.

Thank you for your time and for your engagement on this issue.

Sincerely,

Or Goldschmidt
CEO, Roomors Living, Inc.

SHERMAN TERRACE COOPERATIVE
1010 Sherman Avenue
Bronx, New York 10456

Testimony to the New York City Council
Committee on Housing and Buildings

Comments on Int 407, Int 1120-A
December 02, 2025

Thank you chair Sanchez, and members of the committee for the opportunity to testify today. My name is Derek Kevin Jones, and I am currently serving a Board President of Sherman Terrace Cooperative, a cooperative with 66 apartments in the Grand Concourse of the Bronx. I have served on my board for 6 years and lived in my cooperative for 7 years.

On behalf of the Board of Directors of Sherman Terrace Cooperative, I want to express my opposition to all three bills under consideration.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

- Intro 407 would discourage shareholders from volunteering to serve on their boards by placing an unacceptable risk of liability on individual board members, who cannot possibly speak to the thoughts and personal correspondence of all other board members. This would greatly strain our operations. We continue to have extreme difficulty encouraging our residents to participate in the decision-making activities associated with cooperative housing structure. The battle of complacency would be amplified by a perceived justification of legal liability.

- The requirements of Intro 407 severely hamper the ability of volunteer board members to act on their fiduciary responsibility to protect their co-op community from uncooperative shareholders. The acceptance of even one shareholder who does not regularly pay their bills, is unwilling to participate, and does not follow established policies and laws, is highly disruptive and can have an outsized impact

on every other shareholder in a cooperative. This is a major concern as it is virtually impossible - and very costly - to evict uncooperative shareholders once admitted.

- It is extremely difficult to identify each element of the purchase application a board finds deficient, explain how the application failed to meet specific policies, standards, or requirements of the cooperative, and specify any negative sources that the board used in forming the conclusions that led to each reason listed without incurring potential liability if challenged. We are extremely sensitive to both the financial portfolio as well as the personal and professional recommendations presented in a potential buyer's package. The decision to approve or deny a potential buyer is not taken lightly and every aspect of the individual's fulfillment of past personal responsibilities as well as the sustainability of their financial standing are considered in balanced manner. This bill would punish a prudent board for making decisions in the interest of the financial well-being of the cooperative community.

- From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of our cooperative and other cooperatives across the city.

In short, Intro 407 would harm the communities that exist in housing cooperatives, the only affordable route to homeownership for most New Yorkers.

We respectfully urge the New York City Council to reject Intro 407, Intro 438 and Intro 1120-A.

Thank you for your attention and consideration.

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Testimony in Support of Shared Housing Legislation and the Need for Modernized Operations & Management Standards

Good morning, Chair, members of the Committee, and representatives from HPD.
My name is Julian Phillips Parker, founder of Solid Ground and a Robin Hood Foundation Blue Ridge Lab's Founder's Fellow.

At Solid Ground, our focus is on converting underused office space into deeply affordable shared housing for New York's essential workers — teachers, childcare workers, nurses, social-service staff — the people who keep this city functioning but increasingly cannot afford to live in it.

Today, the reality is stark.
One-bedrooms routinely list between $2,500 and $7,000/month.
Rents grew more than seven times faster than wages last year.
And nearly half of all renters in the city are rent-burdened, spending over 30% of their income on rent alone.

For single adults trying to stay rooted here, the current system simply doesn't work.

This legislation is one of the first real structural steps toward closing that gap.

It recognizes the way the city actually lives today and finally unlocks housing types that meet that reality.

But I want to highlight something that the Shared Housing Roadmap expresses very clearly: **shared housing doesn't succeed because of its unit size — it succeeds because of its operations.**

New York has already seen what happens when communal housing is managed poorly.

We've seen models where rules vary, support is inconsistent, shared spaces deteriorate, and tenants feel unprotected when issues arise.

Many residents — including myself — have experienced versions of this in today's unregulated co-living environment.

Those outcomes aren't inherent to shared housing.

They're the result of **gaps in standards, gaps in oversight, and gaps in operator capacity**.

The strength of this legislation is that it begins to close those gaps.
It sets the regulatory foundation so that the next generation of shared housing is:

- safe
- well-managed
- predictable
- dignified
- and accountable

The operators who step into this space will need to uphold consistent standards — in cleanliness, conflict resolution, staffing, privacy, and tenant protections — and do so **at scale with true fiscal efficiency**.

They'll need strong systems, modern operational practices, and a commitment to providing stable, reliable housing environments.

That is exactly what will allow this housing type to thrive.

And it's exactly what will allow essential workers and single adults to finally have affordable, high-quality options that reflect how New Yorkers live today.

This bill provides the foundation for that ecosystem to emerge responsibly.

It is a necessary and timely step, and I strongly support its passage.

Thank you for your time.

St. Francis Friends of the Poor, Inc.
155 West 22nd Street
New York, NY 10011

Tel: 212-947-0794
stfrancisfriends.org

Christina M. Byrne, MSW
Executive Director

Rev. Thomas J. Walters, OFM
Founder; Director of Tenant Services

Written Testimony in Support of Legalizing Modern Shared Housing for New Yorkers Living With Serious Mental Illness

Good morning Chair and members of the Committee. Thank you for the opportunity to submit testimony in support of Council Member Erik Bottcher's legislation to legalize modern shared housing, including SRO-style units.

My name is Christina Byrne, and I am the Executive Director of St. Francis Friends of the Poor (SFFP). For more than 45 years, SFFP has provided permanent supportive housing for formerly homeless adults living with serious mental illness (SMI). Across three Manhattan SRO residences, we serve nearly 300 tenants who were once trapped in the painful cycle of homelessness, psychiatric hospitalization, shelter stays, and isolation.

Shared housing is not just a viable model for people living with SMI - for many, it is the model that works best. Modernizing and legalizing this housing type is essential if New York City is serious about reducing homelessness among people with serious mental illness.

<u>Shared Housing Meets the Needs of People Living with Serious Mental Illness</u>

1. It prevents the isolation that fuels psychiatric crises

   For individuals with SMI, especially those coming out of homelessness, isolation can be dangerous. Without consistent contact with others, symptoms can worsen, treatment becomes harder to maintain, and the path back to hospitalization or homelessness shortens.

   Shared housing creates an environment where people have a private room of their own but are never left entirely alone. Interaction happens naturally in shared kitchens, lounges, hallways, and community spaces. This sense of belonging is often what allows tenants to remain stable, engaged, and connected to supportive services.

2. It is a manageable, supportive alternative to traditional apartments

   For many people exiting homelessness, a full apartment can feel overwhelming. Cooking, grocery shopping, and maintaining a larger space can trigger crises or set people up to fail.

   SRO-style homes offer a right-sized, simplified living environment: a small private room combined with shared spaces and on-site support. This structure helps tenants maintain mental health stability, focus on recovery, and build routines at a pace they can handle.

3. Shared housing fosters community — a critical component of recovery

> Many of our residents have spent years sleeping in shelters, on the streets, or in institutional settings. The opportunity to live in a supportive community where people check on each other, share meals, and form friendships can be transformative.
>
> Shared supportive housing allows people to rebuild social ties at their own pace, reducing the loneliness and fear that so often accompany severe mental illness and long-term homelessness. Over time, these connections become a powerful stabilizing force.

Why This Legislation Is Needed Now

The city is facing an unprecedented crisis of homelessness and untreated mental illness. Temporary beds and transitional programs have expanded, but permanent, appropriate housing has not. Council Member Bottcher's legislation corrects outdated restrictions and makes it possible to build deeply affordable, service-connected housing tailored to the needs of people with SMI.

Conclusion

Shared supportive housing, including SRO-style models, is a proven, humane, and cost-effective solution. For thousands of New Yorkers with serious mental illness, a small private room within a supportive community is not just housing; it is stability and life-saving care. Our own data show that tenants remain housed with us for an average of 18 years, far longer than most supportive housing programs.

The reality is simple: We cannot end homelessness among people with serious mental illness without rebuilding the housing models that work for them. For many, that means small private rooms, shared spaces, on-site support, and the ability to live within a community designed to meet their needs. Yet current zoning and building code restrictions make these models nearly impossible to build today.

We strongly urge the Council to pass this legislation. Thank you for your leadership and commitment to New Yorkers most in need.

Christina Byrne, MSW
Executive Director
St. Francis Friends of the Poor

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Jason Fachler, Board President

Stewart Hall, 10 Mitchell Place, New York, NY, 10017

Tenants Association of 955 Fifth Avenue, Inc.

955 Fifth Avenue
New York, N.Y. 10075

November 26, 2025

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Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of Tenants Association of 955 Fifth Avenue, Inc., a cooperative corporation that is home to 31 families. Our cooperative is managed by a

volunteer board—neighbors with full-time jobs—who dedicate significant time and effort to maintaining our building's infrastructure, finances, and the safety of our homes.

The Value of Cooperative Governance

Cooperatives have demonstrated remarkable resilience through multiple economic cycles. Even during periods of economic stress, defaults rarely increase, largely because boards carefully vet purchaser applications to ensure buyers are financially qualified and community-minded. This diligent review process is central to the stability and success of cooperatives. Our board's collective, long-term perspective allows us to make capital investment decisions that benefit the building and its residents, rather than focusing on short-term profit. This approach has contributed to the overall improvement of housing quality in New York City over the past several decades.

Increasing Challenges for Cooperative Boards

At the same time, our operating costs continue to rise each year due to an ever-growing number of regulatory requirements imposed by the City, as well as increased insurance premiums, wages, real estate taxes, and utility costs. Volunteer boards like ours are increasingly burdened by the need to manage and address these mandates.

Objections to Proposed Legislation

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not address a demonstrated problem. Discrimination is already illegal in New York City, which recognizes 17 protected classes, and there is no data indicating that housing cooperatives are more likely to discriminate in their admissions practices than private landlords. In fact, according to the New York City Commission on Human Rights, co-op claims make up only a small portion of housing discrimination claims. Against this backdrop, the proposed legislation is excessive and threatens to undermine the very qualities that have made housing cooperatives successful contributors to the City's revitalization.

Rather than cataloging every objection, we wish to highlight the most significant concerns with each bill—those that would most materially and negatively impact our cooperative by increasing costs, intensifying management burdens, and undermining our ability to ensure that purchasers are qualified and positive additions to our community.

Int. No. 407 – Disclosure of Reasons

This bill would require boards to provide detailed written statements explaining why a prospective purchaser was rejected or why conditions were placed on a purchase. We object for several reasons:

- The requirement applies not only to outright rejections but also to situations where conditions are imposed, such as requiring a maintenance escrow for borderline financial qualifications or standard conditions for trust ownership.
- The mandated disclosures could embarrass purchasers and complicate the sales process, as sellers may face delays if purchasers attempt to "remedy" deficiencies.

- The bill invites disputes over whether the stated reasons are "sufficient," increasing the likelihood of litigation and undermining the deference traditionally given to board decisions.
- Requiring a unified statement of reasons from a collective board risks inaccuracies and intra-board conflict, which could be exploited in legal disputes.
- The need for officer certification under penalty of perjury, combined with source-citation and disclosure requirements, increases personal risk for board members and may raise Directors & Officers insurance premiums, discouraging qualified volunteers from serving.

Int. No. 438 – Financial Disclosure

Currently, boards provide prospective purchasers with the last two years of audited financial statements, which is standard practice. This bill would go much further, requiring extensive financial disclosures on accelerated timelines to individuals with no established connection to the building. Our concerns include:

- The bill would require disclosure of sensitive financial information to anyone with an accepted offer, even before a contract is signed, with no requirement for confidentiality.
- This could result in the cooperative's budget, reserves, and capital plans being shared publicly, creating reputational harm, negotiating disadvantages, and security risks.
- The information required exceeds what is regularly provided to shareholders and may not be readily available, necessitating the creation of new documents and the disclosure of "planned" capital improvements, which could lead to disputes over what qualifies as "planned."
- Volunteer boards and managing agents would face increased workloads and professional fees to assemble complex financial packets on short notice, with penalties for even minor, good-faith delays.
- Broad dissemination of sensitive data could chill sales, fuel speculative claims, and increase D&O insurance premiums.

Int. No. 1120 – Applications, Requirements, and Deadlines

This bill would standardize applications and impose strict decision timelines. We object for the following reasons:

- The 10-day acknowledgment and completeness notice would require new tracking systems, additional staffing, and strict calendaring. Minor delays could trigger noncompliance, generating disputes and costs.
- If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information and undermining prudent review.

- Strict adherence to fixed criteria would prevent boards from making sensible exceptions for promising first-time buyers or unique circumstances, undermining equitable access and community judgment.
- Requests for additional information outside standardized forms could be challenged as impermissible, increasing disputes over process rather than focusing on substantive qualifications.

Conclusion

We respectfully urge the Council to reconsider these bills and not pass them. Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Jay Fingerman

As agent for Tenants Association of 955 Fifth Avenue, Inc.
On behalf of the Board of Directors

The 57th St. Dorchester, Inc.
110 East 57th St.
New York City, New York 10022

November 29, 2025

To: District 4 City Council Member Keith Powers
Re: New York City Council meeting December 2, 2025 on proposed bill: Intro 407-2024 – Mandatory Written Reasons for Co-op Sale Denials

Dear Council Member Powers and fellow council members,

This letter is submitted by the Board of Directors on behalf of all the shareholders in The 57th St Dorchester, Inc. ("the Dorchester"). We are writing in protest to the proposed bill: Intro 407-2024 – Mandatory Written Reasons for Co-op Sale Denials.

The Dorchester has been a white-glove co-op in the heart of New York City since its construction in 1957. The Dorchester is a well-run private corporation that has never had any issues with the transfer of its shares and sales transactions for apartments in the building. The Dorchester has always adhered to a rigorous process of reviewing and approving or declining applications for sales and sublets in the building.

The Dorchester follows the Real Estate Board of New York (REBNY) and Council of New York Cooperatives & Condominiums' clear guidance on the anti-discrimination requirements. The Dorchester's application process fully complies with the following laws:

- The Federal Fair Housing Act
- The Civil Rights Act
- The New York State and New York City Human Rights Laws

Co-ops are a fraction of the housing options in NYC. Historically, the right of the Board of Directors of a cooperative to allow or withhold consent from a sale or sublet, for any reason or for no reason, has been recognized and protected by the courts. Shareholders of a cooperative corporation purchase their shares knowing and desiring that they have the right to decide for themselves with whom they would like to share their community.

The proposed bill: Intro 407-2024 – Mandatory Written Reasons for Co-op Sale Denials will have a significant detrimental effect on all New York City cooperative apartment corporations, board members, and shareholders.

⇒ Requiring cooperative Boards of Directors to provide a written statement to any individual who has applied for and been denied consent with respect to a cooperative purchase or sublet application including every reason that the board members had for rejecting the application, describing any requirements that the

applicant failed to meet, and providing all sources of any negative information that the board members relied upon in reaching their decision would force the board members to violate the confidentiality of the buyer and others contacted in the evaluation process.

⇒ Requiring the Board to also provide the rejected applicant with a statement as to the number of applications received and reviewed by the board over the prior three (3) year period and the number of applications that were rejected over that period - *certified by a board member* - would further compel the board members to violate the confidentiality of *numerous* individuals.

This legislation is misguided for at least these reasons:

- The legislation is a solution in search of a problem — *discrimination is already illegal and actionable under existing laws.*
- The legislation *creates potential personal liability for volunteer board members.*
- The legislation *invites frivolous lawsuits with attorney-fee recovery clauses.*
- The legislation will undoubtedly *lead to increased insurance costs for cooperative corporations and could expose boards and board members to punitive fines.*
- The legislation *undermines the discretion and fiduciary duty boards must exercise to protect their buildings and shareholders.*
- The legislation *will discourage volunteerism, increase costs, and destabilize co-op governance citywide*.

The consequences for non-compliance under the proposed legislation would also be severe, including monetary fines for statutory damages into the thousands of dollars per affected party, the potential for private legal claims against individual board members and the board entity, punitive and civil damages, and more. These consequences would only add to the strain on our courts.

What cannot be quantified is the damage to a corporation's reputation. It is extremely difficult and costly for any corporation to recover from damage to its reputation that can be caused by even the most frivolous claims.

We urge the City Council and our esteemed representative to **not pass** the proposed bill: Intro 407-2024 – Mandatory Written Reasons for Co-op Sale Denials.

Respectfully,

Veronique Monier
President, Board of Directors
The 57th St Dorchester, Inc

The BEEKMAN
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November 24, 2025

Keith Powers

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Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of The Beekman Tenants Corporation, a cooperative corporation that is home to 105 families. Our cooperative is managed by a volunteer board—neighbors with full-time jobs—who dedicate significant time and effort to maintaining our building's infrastructure, finances, and the safety of our homes.

The Value of Cooperative Governance

Cooperatives have demonstrated remarkable resilience through multiple economic cycles. Even during periods of economic stress, defaults rarely increase, largely because boards carefully vet purchaser applications to ensure buyers are financially qualified and community-minded. This approach has contributed to the overall improvement of housing quality in New York City over the past several decades.

Increasing Challenges for Cooperative Boards

At the same time, our operating costs continue to rise each year due to an ever-growing number of regulatory requirements imposed by the City, as well as increased insurance premiums, wages, real estate taxes, and utility costs. Volunteer boards like ours are increasingly burdened by the need to manage and address these mandates.

Objections to Proposed Legislation

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not address a demonstrated problem. Discrimination is already illegal in New York City, which recognizes 17 protected classes, and there already exists a mechanism for addressing any problems. Further, there is no data indicating that housing cooperatives are more likely to discriminate in their admissions practices than private landlords. Against this backdrop, the proposed legislation is excessive and threatens to undermine the very qualities that have made housing cooperatives successful contributors to the City's revitalization.

Rather than cataloging every objection, we wish to highlight the most significant concerns with each bill—those that would most materially and negatively impact our cooperative by increasing costs, intensifying management burdens, and undermining our ability to ensure that purchasers are qualified and positive additions to our community.

Int. No. 407 – Disclosure of Reasons

This bill would require boards to provide detailed written statements explaining why a prospective purchaser was rejected. We object for several reasons:

- The mandated disclosures could embarrass the purchaser and complicate the sales process. Further, sellers (who may ordinarily seek a new purchaser if there is a rejection) may be harmed as they may face delays if purchaser attempts to "remedy" deficiencies.

- The bill invites disputes over whether the stated reasons are "sufficient," increasing the likelihood of litigation and undermining court approved deference traditionally given to board decisions.
- Requiring a unified statement of reasons from a collective board risks inaccuracies and intra-board conflict, which could be exploited in legal disputes.
- The need for officer certification under penalty of perjury increases personal risk for board members and, along with increasing Directors & Officers insurance premiums, will discourage qualified volunteers from serving on the board.
- Requiring disclosure of the source of any negative information will undoubtedly cause tremendous embarrassment to the purchaser, and will stifle the flow of true and complete to the Board.

Int. No. 438 – Financial Disclosure

Currently, boards provide prospective purchasers with the last two years of audited financial statements, which is standard practice. This bill would go much further, requiring extensive and costly financial disclosures on accelerated timelines.

- The bill would require disclosure of sensitive financial information to anyone with an accepted offer, even before a contract is signed, with no requirement for confidentiality. This could result in the cooperative's budget, reserves, and capital plans being shared publicly, creating reputational harm, negotiating disadvantages, and security risks.
- The information required seems to require up-to-date information, which will require a tremendous amount of extra expenses due to the additional work required by management and accountants in preparing these complex financial packages on such short notice. In some buildings, there are a dozens of applications each year.
- The disclosure of "planned" capital improvements will only lead to disputes over what qualifies as "planned." Is the mention of a new roof in three years a "planned capital improvement?"

Int. No. 1120 – Applications, Requirements, and Deadlines

This bill would impose unreasonably strict timelines. We object for the following reasons:

- The 10-day acknowledgment and completeness notice would require new tracking systems, additional staffing, and strict calendaring. Minor delays could trigger noncompliance, generating disputes and costs.

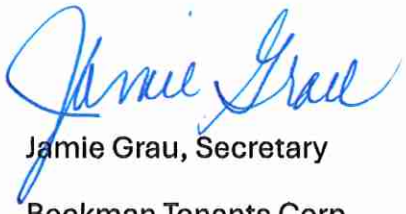
- If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information and undermining prudent review. It has been reported in some jurisdictions that such deadlines have resulted in rejections by boards, rather than face a violation of the mandatory deadlines.
- Strict adherence to fixed criteria would prevent boards from making sensible exceptions for promising first-time buyers or unique circumstances,.
- Requests for additional information outside standardized forms could be challenged as impermissible, increasing disputes over process rather than focusing on substantive qualifications.

Conclusion

We respectfully urge the Council to reconsider these bills and not pass them. Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

On behalf of the Board of Directors



Jamie Grau, Secretary

Beekman Tenants Corp.

BRC
HOPE. HEALTH. HOME.

12/2/2025

Committee on Housing and Buildings
NYC City Hall
City Hall Park, New York, NY 10007

In Support of Int 1475-2025: A Local Law to Permit SROs in Class A Multiple Dwellings

The Bowery Residents' Committee (BRC) submits this written testimony in strong support of Intro 1475-2025. BRC is one of New York City's largest and most experienced housing and social service nonprofits, serving nearly 13,000 individuals each year through more than 30 programs across the metropolitan area. Our mission is to help New Yorkers experiencing homelessness achieve stability, wellbeing, and permanent housing.

NYC's homelessness and affordability challenges continue to deepen. More than 80,000 individuals rely on the shelter system each night, with thousands more living unsheltered. Many New Yorkers, especially the individuals we serve, face significant obstacles to securing permanent housing, including limited income, rental history challenges, and complex medical or behavioral health needs. At the same time, the pace of traditional affordable housing development cannot meet the scale of current need.

Intro 1475-2025 is a necessary step toward addressing this gap. By permitting the development of modern Single Room Occupancy (SRO) units within new and converted Class A multiple dwellings, the bill would enable a proven and highly efficient housing model to serve single adults experiencing homelessness. Contemporary SROs provide privacy, autonomy, and permanence: individual leases, personal keys, and full tenancy rights. They are not temporary or transitional settings. They are homes.

The advantages of SRO housing are clear. SROs allow more units to be created within the same building footprint, significantly expanding the supply of deeply affordable housing. They offer a dignified and appropriate option for individuals who urgently need a stable place to live. For many of BRC's clients, SROs provide exactly what is needed to exit homelessness - privacy, safety, and a foundation for long-term stability.

Modern SROs will not solve homelessness alone, but they are an essential tool. It is one that NYC must embrace if we are serious about expanding access to permanent, affordable housing for the individuals who need it most.

For these reasons, BRC strongly supports the passage of Intro 1475-2025 and urges the City to adopt these common-sense reforms that will meaningfully strengthen the City's housing landscape.

Sincerely,
Kyle Jeremiah
Director of External Affairs

CARLYLE HOUSE
50 EAST 77TH STREET
NEW YORK, NY 10075

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.

- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

s/Karen Brenner

s/Ruth Clapper

s/David Campagna

s/Drew Cohen

s/John D. Dale Jr.

s/Willaim M. Kahn

s/Peter Thompson

The Carlyle House

PRRAC

Poverty & Race Research Action Council

740 15th St. NW • Suite 300 • Washington, DC 20005 • www.prrac.org

Statement of Poverty & Race Research Action Council ("PRRAC")
in support of Intro 407-A, December 2, 2025
Hearing before Committee on Housing & Buildings, NYC Council

The Poverty & Race Research Action Council (PRRAC) is a civil rights law and policy organization whose mission is to address structural inequality. Our advocacy work focuses primarily on housing and education policy, but also involves land use, and the interconnections between housing policy and education, health, and transportation. These policy areas too often reflect inequities driven by structural segregation.

New York City has long been a paradox. Often thought of as a highly progressive city, it remains one of the most deeply residentially segregated major cities in the United States, and the epicenter of one of the most deeply residentially segregated major metropolitan areas in the United States.

Another paradox: New York City has long had one of the strongest local Human Rights Laws in the country – in some respects the strongest. And that law squarely prohibits discrimination by housing providers, including coop boards.

But there is a huge, practical loophole exploited by the entire coop industry. When a prospective buyer is turned down by a coop board, it is the universal industry practice to refuse to disclose the reasons. As a result, discriminatory conduct is harder to detect, and discrimination-defense lawyers can invent false reasons after-the-fact. This is exactly the opposite of how you want a process to proceed. The coop board knows its reasons at the time it makes its decision. Share those reasons with the family who has gone through a months-long effort to secure a new home. The only circumstance where having that information would ultimately generate a fair housing lawsuit is if the coop's reasons just didn't add up.

Coop secrecy is not a practice limited to some tiny corner of the real estate market. There are hundreds of thousands of coop apartments in New York City, apartments that house more people than live in most U.S. cities.

Intro 407-A's provisions will close the coop-secrecy loophole. And it will do so without limiting in any way the lawful reasons for which a coop can reject an applicant.

It is no surprise that coop boards want to retain the current system. Those being made subject to new civil rights laws almost always want to insulate themselves from scrutiny or accountability. Whenever an effort is made to strengthen civil rights law is made, there is a determined group of opponents who invents a parade-of-horribles to explain why strengthening the law would be a bad thing. This playbook is well-known, well-worn, and is as lacking in merit here as when other core civil rights legislation has been passed.

PRRAC

Poverty & Race Research Action Council

740 15th St. NW • Suite 300 • Washington, DC 20005 • www.prrac.org

As the Civil Rights Coalition for Transparency & Accountability has long said: "There has seldom been a more-clear cut case of 'which side are you on?' On the pro-disclosure side are the interests of effective fair housing enforcement, transparency, accountability, as well as a coalition of civil rights and allied organizations and the vast majority of New Yorkers. On the anti-disclosure side, you have a small and deeply unrepresentative group desperate to maintain secrecy, privilege, and unaccountability. Stand with the pro-disclosure side."

It is long past time to enact this legislation.

BELL PARK GARDENS
67-02 SPRINGFIELD BOULEVARD
BAYSIDE, NY 11364
(718) 229-1717
WWW.BELLPARKGARDENS.NYC

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

On behalf of the Board of Directors of United Veterans Mutual Housing Company #2 Inc. we submit this testimony in strong opposition to Intro 407, the so-called "Reasons Bill," which would require cooperative housing boards to issue detailed written explanations for any rejected applications.

United Veterans Mutual Housing Company #2 Inc.. is a long-established cooperative community in Bayside, Queens, founded on principles of fairness, shared responsibility, and community trust. We have over 800 units of affordable middle and working class housing. Our volunteer board members devote countless hours to ensuring safe, affordable, and well-managed homes for our residents. Like co-op boards throughout New York City, our decisions are guided by integrity and the best interests of our community.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing.

From a governance standpoint, it would discourage shareholders from volunteering to serve on their boards. The bill's burdensome requirements would transform ordinary board service into a quasi-legal process, subjecting every decision to potential challenge and undermining the discretion necessary for sound governance.

From a legal standpoint, Intro 407 would expose volunteer board members to increased risks of litigation and personal liability. By requiring written "reasons" for all rejections, the bill effectively creates a legal roadmap for lawsuits, turning cooperative communities into adversarial environments.

From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of middle-income co-op communities across the city. In short, Intro 407 would replace cooperation

with confrontation, and community with conflict. It would harm the very communities it seeks to protect.

For these reasons, the Board of Directors of Bell Park Gardens respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
United Veterans Mutual Housing Company #2 Inc.

_____
By: Brian S. Sokoloff, President

UNITED VETERANS MUTUAL HOUSING COMPANY, INC.
BELL PARK MANOR – TERRACE

TELEPHONE: 718-465-6070
FAX: 718-468-7556

221-22 MANOR ROAD
BELLEROSE MANOR, NY 11427

November 13, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

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For these reasons, the Board of Directors of United Veterans Mutual Housing Company, Inc. respectfully urges the New York City Council to reject Intro 407 and instead engage with cooperative housing leaders to develop policies that promote fairness and transparency without eroding the foundations of co-op governance.

Thank you for your attention and consideration.

Respectfully submitted,

Board of Directors
United Veterans Mutual Housing Company, Inc.

BY _____ PRES.

Dear City Council Committee on Housing and Buildings,

As co-chair for the Village Interagency Task Force which was created one year ago and includes Washington Square Park and surrounding area, I have specifically focused on outreach, street homelessness, addiction and housing issues in this neighborhood. We meet monthly with all city agencies related to these items as well as with city and state funded providers like Goddard, BRC, Project Renewal, DHS, Paul's Place, and many more. We have continuously heard about a myriad of issues and hurdles associated with helping people move towards a safer, prosperous and more independent lives and one of these is housing. Especially housing that is EXTREMELY affordable and that is also community oriented.

The dorm style SRO housing concept would be a gift to New Yorkers struggling with getting back on their feet and integrated into society. It is the MOST affordable option and it also offers a more community oriented living situation that many people coming off of the streets, directly from shelters or who were previously incarcerated really need to flourish. It does not make sense to not have every housing type available in our arsenal. For many, SROs offer a means of more permanent housing and for others a stepping stone to getting back on their feet. It also offers a more community oriented environment which many want as an option…and at a price that they can afford.

This housing option is an important missing piece in increasing the supply of affordable options for those most in need. Please vote YES!

Sincerely,

Vanessa Warren

Co-Chair; Village Interagency Task Force

120 W.70 Owners Corp.
120 West 70th Street
New York, New York 10023

November 17, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Opposition to Intro. 407, Intro. 438, Intro. 1120-A

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony on behalf of the residents of 120 W.70 Owners Corp., a 38-unit cooperative on the Upper West Side. Our building became a housing cooperative in 1979 and the residents include a broad mix of young and old working and middle class families, including individuals who have lived in this building for 50 years.

We write in opposition to Intro. 407, Intro. 438 and Intro.1120-A. These bills, aimed directly at co-ops, will require substantial changes in admissions practices and substantial disclosure of cooperative financial information to prospective purchasers. All of them will make boards' jobs much harder and create various issues that will require board time, and likely legal fees, to address. At bottom, the three bills will severely damage the ability of co-op board members to protect the affordability of existing homes for more than a million current co-op homeowners and would provide little to no help to prospective homeowners.

You must be aware that cooperative housing is one of New York City's most successful and stable models of homeownership. Co-ops and condos citywide provide the first homeownership opportunity for many New Yorkers as well as an affordable home for well over a million existing New York homeowners and residents. Therefore, each co-op's admissions process must be equitable, transparent and protective. **BUT** co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

Intro. 407

Intro. 407 would impose difficult to impossible constraints on the admissions process, and would discourage the time-consuming volunteer board service that is the hallmark of cooperative living. Any rejection would require a detailed listing of reasons that could open the co-op and individual board members to excessive liability and/or extensive legal fees. Aside from the administrative burden it places on volunteer board members, it also opens the door to penalties and damages such that many boards will hesitate to reject any applicant. And, because the certification is made

under the penalty of perjury, there could even be criminal repercussions for the certifying board member.

While we appreciate the Council's intent to promote transparency, Intro. 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect. which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

This proposed legislation springs from an incorrect assumption that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro. 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined impact of Intro. 407 would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

Intro. 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

Intro. 438

Intro. 438 would require boards to open their co-op to liability for trying to plan ahead by mandating the release of unverified working documents and unaudited or unreviewed financial statements to prospective purchasers who have no legal relationship with, or obligation to, the cooperative.

The bill requires the co-op to disclose its finances within fourteen days of a request by a potential purchaser. The financial disclosure must include, at a minimum: assets and liabilities, including cash flow, debt, and operating expenses; any capital improvements planned or commenced; amount in reserve; and most recent budget (or a statement that the co-op does not prepare a budget). All that is required is that there be an accepted offer – there does not even need to be a contract of sale in place. Failure to timely comply carries a $500 civil penalty which may be sought by the City at New York City Office of Administrative Trials and Hearings ("OATH").

This legislation imposes entirely unacceptable disclosure mandates on cooperatives which issue stock certificates in the corporate entity. These disclosure mandates are inconsistent with fiscal disclosure laws that apply to the sale of stock in a corporation. These are also mandates that apply to no other small business in New York City.

Intro. 1120-A-2024

Intro. 1120-A would impose a one-size-fits-all time frame on the very diverse co-op universe of New York City. It would reduce the effectiveness of co-op admissions and damage best practices by requiring boards to state that purchase applications are complete before board members have even had sufficient time to review documents for inaccuracies, inconsistencies, missing back-up information and indicia of possible fraud. The penalty for failure to meet the proposed timeline is the acceptance of a potentially financially irresponsible or dangerous individual. In addition to the liability issues and costs issues imposed upon boards and cooperatives, once again, this bill completely disregards the reality that boards are comprised of volunteers who have busy lives outside of running a co-op for free.

We urge the Council to reject Intros. 407, 438, and 1120-A and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

/s/ Beth Haroules
Beth Haroules, President
beth120w70@gmail.com

/s/ Joseph Kennedy
Joseph Kennedy, Treasurer
jkpr120@hotmail.com

120 W.70 Owners Corp.
120 West 70th Street
New York, New York 10023

811 Walton Tenants Corporation
811 Walton Avenue
Bronx NY 10451-2333

Testimony to the New York City Council
Committee on Housing and Buildings

Comments on Int 438 November 13, 2025

Thank you chair Sanchez, and members of the committee for the opportunity to provide written testimony today.

On behalf of the board of 811 Walton Tenants Corp regret the inability to attend in person, due to other professional obligations; however we would like to provide comment on the introductions before the committee.

My name is Hannah Glover and I am a board member of 811 Walton Tenants' Corp, a cooperative with 139 apartments in the Bronx. I have served on my board roughly six years and lived at 811 for 10 years.

On behalf of the Board of Directors of 811 Walton I want to express my concern over Intro 438, which would require co-ops to provide prospective shareholders financial information including planned capital improvements.

While we appreciate the Council's goal of increasing transparency, Intro 438 is not specific enough in its language, and could have serious unintended consequences for buildings, board members and co-op residents.

- With respect to Intro 438, we have concerns about the limitations that we face as fiduciaries to accurately project capital expenses, since the bill says "planned" but does not stipulate how many years into the future. As fiduciaries, it is the best interest of our co-op and our shareholders to plan as many years into the future as practicable. We live in a building that turns 100 years old, which has a lot of maintenance that should be planned over the long-term. But being held accountable to projecting costs even two years out is a challenge.

- For example, our building underwent a large facade project in line with Local Law 11 and our regular FISP cycle, which was meant to begin in early 2020. The project was delayed due to the Covid-19 lockdowns, which meant that our sidewalk shed had to remain up far longer than anticipated at an unanticipated cost. The Intro 438, as written, does not account for unforeseen events that make our initial estimates inaccurate.
- Similarly, we suffered from supply chain issues and materials cost inflation that pressured our budgets further.
- Relatedly, we are a landmark building pursuing a new permit to replace old windows. Between 2019 and 2025 the projected cost of windows in our building has risen nearly three-fold due to inflation, materials cost changes and LPC revisions to our initial design. As a result, we have yet to start replacements at scale as the budgeting we had planned on suddenly covered only a fraction of what we would need. Our permits, which are only good for a certain number of years, lapsed. Not only did we have to take on additional cost for renewal, review and revision, but again the cost of the windows increased. The proposed Local Law does not state that projections have to be reasonable at the time they are provided or account to circumstances like our building faced– instances out of our control that resulted in radically higher costs than what we had budgeted – and therefore would have, in good faith, disclosed. We are concerned about liability in cases like ours if prices change.
- The bill, as written, does not account for any time elements. When the proposal refers to “planned work,” in what time frame does that anticipate the work will start? Is it within 12 months? 24? If it is uncapped, it creates a disincentive for buildings to draft long-term capital plans, which are critical to the health of a coop, like ours, which celebrates its centennial next year. Volunteer board members will fear being held liable for citing numbers connected with those long-term plans when, in fact, the costs could radically change. We are volunteers and cannot bear the risk of being held liable in such circumstances.
- Further, in conducting our facade review as part of LL11, we discovered another structural issue within the building, not anticipated in the initial bid, that required a repair that costs tens of thousands of dollars in work, engineering, permits and support in city reviews. As written, Intro 438 does not address emergency situations, like the one we encountered. We would

urge that the proposal acknowledge that true emergencies may occur, and that boards will not be penalized for not disclosing such unknown costs.

- Similarly, if the Council believes the emergencies are excluded already as this bill is written, the proposed Local Law would incent buildings to treat every capital improvement like an emergency, which will ultimately result in less transparency to both prospective buyers and existing shareholders, which seems to be the opposite of the intent of the proposal.
- Finally, we have concerns about being required to share confidential information. For example, if we are in the process of bidding a project, or selecting vendors. We may be providing unaudited or premature data. It also means non-owners may be getting information before existing shareholders. The bill could address this, for example, by specifying that the “financial information” described within refers only to information or documents that would also be available to shareholders through the normal course of coop business.

In short, Intro 438 would harm the communities that exist in housing cooperatives, the only affordable route to homeownership for most New Yorkers. We respectfully urge the New York City Council to reject Intro 438 as drafted.

Thank you for your attention and consideration.

Hannah Glover
On behalf of the board at 811 Walton
811 Walton Ave
Bronx NY 10451
811board@gmail.com

WATERVIEW TOWERS, INC.
2630 Cropsey Avenue
Brooklyn, NY 11214
718-372-5955
Waterviewt@yahoo.com

November 13, 2025

New York City Council
Committee on Housing and Buildings

Re: Proposed bills Int 407, Int 438, Int 1120-A

I am the President of the Board of Directors of Waterview Towers, Inc., a residential co-op corporation consisting of two 16-floor buildings with 325 co-op apartment owners located in southwest Brooklyn.

I have been a shareholder since 1999, and a member of this Board since approximately 2007. I have also served as Secretary and as Treasurer. We use no management company. We self-manage, but employ a full-time office manager in our lobby office.

If the proposed bills (Int. 407, 438, 1120-A) pass, it will be detrimental to all of us little-guy homeowners.

As a small homeowner, who chose co-op ownership (so I do not have to shovel snow, mow my own grass, take out the trash, etc.) I became a volunteer Board member essentially to protect the investment in my home.

These proposed bills seem to be an attempt to legislate problems that do not realistically exist, e.g., admissions procedures and financial and other disclosures.

Instead, if these bills pass, they will discourage me, and other qualified people from serving as a Director and/or Officer. It is currently difficult to get good people to volunteer to serve as Directors, and legislation like this will only make that situation worse. For example, at our recent annual meeting, only the three Board members whose terms had expired volunteered to run again for reelection. No one else threw their hat in the ring for those seats. This has been the case frequently over the years.

Being a productive Board member requires time. Passage of these bills will, among other things, create more work and time expenditure for those on the Board. Most members do not have much time to spare because things like work, kids, chores, football games i.e., *Life* gets in the way.

If these bills pass, besides the increased time factor, the addition of increased risk of personal liability and stress of unrealistic and unnecessary admissions deadlines and reporting requirements will be a deal-breaker for many otherwise qualified people to volunteer and serve. Thus, the resulting diminished quality of its Board will be detrimental and ultimately costly to all shareholders.

Passage of these bills will also increase all shareholders' legal fees and insurance premiums. It will create unnecessary work, excessive legal consultation, and potentially expose otherwise confidential unaudited financial information.

This co-op was created in 1960 as a Mitchell Lama co-op and has been private since 1989. I believe that none of the issues addressed in the proposed bills have been problematic in all that time.

I believe the same is true for our neighboring co-ops: Oceanview Towers, Contello Towers, and Harway Terrace which are five other similar co-op buildings within blocks of ours, each also with approximately 160 households or more in each of those buildings. I believe that they too, have no problems that these bills purportedly will resolve. The practices and procedures currently in place for all of us seem to be working fine.

If it ain't broke, no need to fix it.

We need help with taxes, utilities, water, and financing all of the compliance with the various local laws that have already been legislated – albeit with good intentions - that negatively affect our working-class communities. I would like to see our elected officials address those things rather than make our lives more difficult and stressful.

Hopefully these bills will not pass.

Respectfully,

William Hershkowitz, President

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007
Re: Testimony in Opposition to Intro 407 (“The Reasons Bill”)

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the “Reasons Bill,” which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City’s most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings’ financial and physical health.

While we appreciate the Council’s intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided
This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.

Create a roadmap for litigation by requiring written “reasons” for denials, inviting frivolous and costly lawsuits.

Drive up insurance premiums, further straining the affordability of co-op living.

Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.

Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened

governance across thousands of co-op buildings throughout the city.

A Broader Warning
Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard
We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,
David Saphier, President
180 West End Ave Coop

Testimony

Int. 407

The requirements of this bill would be difficult if not impossible to meet, given the short timelines. It is likely that this bill would enable frivolous lawsuits, given the difficulty for a board to produce a fully accurate sworn statement in such an abbreviated time period. The bill would expose volunteer board members to such lawsuits and, potentially, personal liability by requiring an individual board member to affirm under penalty of perjury that the statement contains the totality of the reasons for the board's decision to withhold consent.

As a result:

- Insurance for board members (Directors & Officers insurance) would become much more expensive.
- Fewer people would want to volunteer to serve on boards (there's already a shortage).
- Good people who keep co-ops affordable, safe, and well-run would be scared away.

The bill would also make boards afraid to say "no" to applicants even when they have legitimate concerns, because they fear lawsuits. This weakens their ability to protect the building and the shareholders – the exact job they're supposed to do.

Discrimination is already illegal under existing laws. This bill doesn't add any new protection against real discrimination; it just makes normal, responsible decision-making risky and unstable for co-ops.

Int. 438

Unlike the basic info many co-op boards already give out, this bill would force boards to reveal unverified numbers and plans that haven't been checked by an accountant.

It's very hard for a board to know exactly when a repair or upgrade counts as "planned" under the bill's wording. It's even harder to guess the final cost because prices can change due to unexpected extra work, new compliance rules from the city, higher insurance demands, supply problems, and many other things no one can predict.

Releasing these rough, unconfirmed estimates would make board members break their legal duty to keep internal working papers private.

Finally, people who are just thinking about buying an apartment aren't shareholders yet, so they have no right to demand this information from the board. They should ask the seller or the seller's broker instead.

Int. 1120A

A single, strict deadline doesn't work for all co-ops, because co-ops come in very different sizes and have different rules. Some are small buildings with only a few staff or volunteers; others, like our building, are huge with hundreds of units. Forcing everyone to follow the exact same short timeline is unfair and unrealistic.

Many co-ops simply won't have enough people available to fully review an application that quickly.

It also doesn't make sense to call an application "complete" before the board has had time to carefully check everything. When boards read the paperwork closely, they almost always have follow-up questions. They often need to ask for more documents or clarifications to make sure the buyer's information is accurate. That extra step takes time, and this bill wouldn't allow it.

Leo Bazil

Board President

170 West End Ave Owners Corp

8 East 96th Street, Inc.

To:

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Ana Sanchez, Chair, Committee on Housing and Buildings
The Honorable Jumaane D. Williams, Public Advocate
The Honorable Amanda Farias, Majority Leader
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407, Intro 438, and Intro 1120 ("Co-op Transparency Package")

Dear Speaker Adams, Chair Sanchez, Public Advocate Williams, Majority Leader Farias, and Members of the New York City Council,

We write on behalf of the Board of 8 East 96th Street, a cooperative residential community in Carnegie Hill, Manhattan, to express our strong opposition to the package of bills currently before the Committee—Intro 407 ("The Reasons Bill"), Intro 438, and Intro 1120—which would place onerous and unnecessary procedural burdens on cooperative housing corporations across New York City.

While we appreciate the Council's intent to promote transparency, these proposals would have damaging unintended consequences for thousands of volunteer-run co-op boards that already operate under stringent anti-discrimination laws at the city, state, and federal levels.

Why These Bills Are Misguided

- Intro 407 would require sworn, detailed explanations for any rejected purchase application, exposing volunteer board members to personal liability and creating a roadmap for costly litigation
- Intro 438 would compel disclosure of sensitive building financial information to prospective purchasers, potentially misrepresenting a building's financial health and violating confidentiality norms.
- Intro 1120 would impose rigid timeframes and "deemed consent" provisions that ignore the realities of volunteer governance and seasonal scheduling.

The Broader Impact

Cooperative housing has long been one of New York City's most stable and affordable ownership models, providing homes for hundreds of thousands of residents. These volunteer boards—neighbors serving neighbors—devote significant unpaid time to managing building finances, maintenance, and resident well-being. By treating them as potential wrongdoers

rather than community stewards, the proposed legislation would discourage participation and increase costs for all shareholders.

Our Request

We urge the Council to reject Intros 407, 438, and 1120 and to engage directly with co-op boards, management professionals, and civic leaders to craft policies that balance transparency with practical governance. We believe collaboration, not punitive regulation, is the best path forward to support New York's cooperative communities.

Thank you for your consideration and for your continued service to New York City residents.

Pamela Roach
President, Board of Directors
8 East 96th Street, Inc.
New York, NY 10128

[redacted]

GUMLEY HAFT
REAL ESTATE

November 24, 2025

Keith Powers
211 East 43rd Street
Suite 1205
New York, New York 10017
kpowers@council.nyc.gov

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Pierina Ana Sanchez (District 14)
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Jumaane D. Williams
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1 Centre Street 15th Floor North
New York, NY 10007
gethelp@advocate.nyc.gov
Amanda Farias
778 Castle Hill Avenue
Bronx, NY 10473
district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 10 East 70th Street, Inc. a cooperative corporation that is home to 46 families. Our cooperative is managed by a volunteer board—neighbors with full-time jobs—who dedicate significant time and effort to maintaining our building's infrastructure, finances, and the safety of our homes.

The Value of Cooperative Governance

Cooperatives have demonstrated remarkable resilience through multiple economic cycles. Even during periods of economic stress, defaults rarely increase, largely because boards carefully vet purchaser applications to ensure buyers are financially qualified and community-minded. This approach has contributed to the overall improvement of housing quality in New York City over the past several decades.

Increasing Challenges for Cooperative Boards

At the same time, our operating costs continue to rise each year due to an ever-growing number of regulatory requirements imposed by the City, as well as increased insurance premiums, wages, real estate taxes, and utility costs. Volunteer boards like ours are increasingly burdened by the need to manage and address these mandates.

Objections to Proposed Legislation

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not address a demonstrated problem. Discrimination is already illegal in New York City, which recognizes 17 protected classes, and there already exists a mechanism for addressing any problems. Further, there is no data indicating that housing cooperatives are more likely to discriminate in their admissions practices than private landlords. Against this backdrop, the proposed legislation is excessive and threatens to undermine the very qualities that have made housing cooperatives successful contributors to the City's revitalization.

Rather than cataloging every objection, we wish to highlight the most significant concerns with each bill—those that would most materially and negatively impact our cooperative by increasing costs, intensifying management burdens, and undermining our ability to ensure that purchasers are qualified and positive additions to our community.

Int. No. 407 – Disclosure of Reasons

This bill would require boards to provide detailed written statements explaining why a prospective purchaser was rejected. We object for several reasons:

- The mandated disclosures could embarrass the purchaser and complicate the sales process. Further, sellers (who may ordinarily seek a new purchaser if there is a rejection) may be harmed as they may face delays if purchaser attempts to "remedy" deficiencies.
- The bill invites disputes over whether the stated reasons are "sufficient," increasing the likelihood of litigation and undermining court approved deference traditionally given to board decisions.

- Requiring a unified statement of reasons from a collective board risks inaccuracies and intra-board conflict, which could be exploited in legal disputes.
- The need for officer certification under penalty of perjury increases personal risk for board members and, along with increasing Directors & Officers insurance premiums, will discourage qualified volunteers from serving on the board.
- Requiring disclosure of the source of any negative information will undoubtedly cause tremendous embarrassment to the purchaser, and will stifle the flow of true and complete to the Board.

Int. No. 438 – Financial Disclosure

Currently, boards provide prospective purchasers with the last two years of audited financial statements, which is standard practice. This bill would go much further, requiring extensive and costly financial disclosures on accelerated timelines.

- The bill would require disclosure of sensitive financial information to anyone with an accepted offer, even before a contract is signed, with no requirement for confidentiality. This could result in the cooperative's budget, reserves, and capital plans being shared publicly, creating reputational harm, negotiating disadvantages, and security risks.
- The information required seems to require up-to-date information, which will require a tremendous amount of extra expenses due to the additional work required by management and accountants in preparing these complex financial packages on such short notice. In some buildings, there are a dozens of applications each year.
- The disclosure of "planned" capital improvements will only lead to disputes over what qualifies as "planned." Is the mention of a new roof in three years a "planned capital improvement?"

Int. No. 1120 – Applications, Requirements, and Deadlines

This bill would impose unreasonably strict timelines. We object for the following reasons:

- The 10-day acknowledgment and completeness notice would require new tracking systems, additional staffing, and strict calendaring. Minor delays could trigger noncompliance, generating disputes and costs.
- If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information and

undermining prudent review. It has been reported in some jurisdictions that such deadlines have resulted in rejections by boards, rather than face a violation of the mandatory deadlines.

- Strict adherence to fixed criteria would prevent boards from making sensible exceptions for promising first-time buyers or unique circumstances,.
- Requests for additional information outside standardized forms could be challenged as impermissible, increasing disputes over process rather than focusing on substantive qualifications.

Conclusion

We respectfully urge the Council to reconsider these bills and not pass them. Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Harry Smith
Asst. Secretary
On behalf of the Board of Directors
10 East 70th Street, Inc.

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Intro 407
Date: Monday, December 1, 2025 2:38:44 PM

From: John Waldes [redacted]
Sent: Monday, December 1, 2025 2:38 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Intro 407

[redacted]

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.

Drive up D&O insurance premiums, further straining the affordability of co-op living.

- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

John Waldes, President

10 West 66th Street Corporation
10 West 66th Street
New York City, NY 10023

Carnegie Hill Co-op Board Testimony Packet

Short Testimony for NYC Council Portal

Subject: Opposition to Intros 407, 438 & 1120 – “Co-op Transparency Package”

Dear Chair Sanchez and Members of the Committee,

On behalf of the Board of Directors of 17-19 East 95th Street Cooperative in Manhattan, we respectfully submit this testimony in opposition to Intros 407, 438, and 1120.

While intended to promote transparency, these bills would impose punitive procedural burdens on volunteer co-op boards, expose them to unnecessary litigation, and increase costs for residents. Co-ops already comply with extensive anti-discrimination laws; these measures would not improve fairness but would discourage participation and weaken good governance.

This “one size fits all” approach would be totally unworkable for the diverse housing cooperatives of the City. At a minimum, there needs to be a reasonable carve-out for small buildings with fully voluntary management structures that simply do not have the means to comply with these unnecessary regulations.

We urge the Council to reject these bills and instead collaborate with co-op boards and housing professionals on balanced policies that preserve transparency without undermining community-based ownership. We would be more than happy work with the Council to develop a useful and workable approach.

Thank you for your consideration.

David E Levy
President, 17-19 East 95th Street Cooperative
17 East 95th Street
New York NY 10128

Full Letter for Council Submission

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Ana Sanchez, Chair, Committee on Housing and Buildings
The Honorable Jumaane D. Williams, Public Advocate
The Honorable Amanda Farias, Majority Leader
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407, Intro 438, and Intro 1120 ("Co-op Transparency Package")

Dear Speaker Adams, Chair Sanchez, Public Advocate Williams, Majority Leader Farias, and Members of the New York City Council,

We write on behalf of the Board of [Building Name], a cooperative residential community in Carnegie Hill, Manhattan, to express our strong opposition to the package of bills currently before the Committee—Intro 407 ("The Reasons Bill"), Intro 438, and Intro 1120—which would place onerous and unnecessary procedural burdens on cooperative housing corporations across New York City.

While we appreciate the Council's intent to promote transparency, these proposals would have damaging unintended consequences for thousands of volunteer-run co-op boards that already operate under stringent anti-discrimination laws at the city, state, and federal levels.

Why These Bills Are Misguided

- Intro 407 would require sworn, detailed explanations for any rejected purchase application, exposing volunteer board members to personal liability and creating a roadmap for costly litigation
- Intro 438 would compel disclosure of sensitive building financial information to prospective purchasers, potentially misrepresenting a building's financial health and violating confidentiality norms.
- Intro 1120 would impose rigid timeframes and "deemed consent" provisions that ignore the realities of volunteer governance and seasonal scheduling.

The Broader Impact

Cooperative housing has long been one of New York City's most stable and affordable ownership models, providing homes for hundreds of thousands of residents. These volunteer boards—neighbors serving neighbors—devote significant unpaid time to managing building finances, maintenance, and resident well-being. By treating them as potential wrongdoers rather than community stewards, the proposed legislation would discourage participation and increase costs for all shareholders.

Our Request
We urge the Council to reject Intros 407, 438, and 1120 and to engage directly with co-op boards, management professionals, and civic leaders to craft policies that balance transparency with practical governance. We believe collaboration, not punitive regulation, is the best path forward to support New York's cooperative communities.

Thank you for your consideration and for your continued service to New York City residents.

[Name]
[Title, e.g., President, Board of Directors]
[Building Name]
[Address]
New York, NY 10028

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407; Intro 438; Intro 1120A

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

Thank you for the opportunity to provide testimony in opposition to the above-referenced proposals.

My name is Isabel Taube, and I currently am the President of the Board at 22 West 26th Street in Manhattan.

While these three measures may be well-intentioned, they will lead to outcomes that will increase costs, reduce flexibility, and make co-op living even less affordable. Their combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings, including my own, throughout the city.

I support the arguments in opposition to these three proposals submitted by the Council of New York Cooperatives & Condominiums (CNYCC) (please see below). I ask that the City Council members vote against Intro 407, Intro 438, and Intro 1120A.

Thank you for your consideration.

Sincerely,

Isabel Taube

President, 22 West 26th Street Apartment Corporation

Intro. 407-2024
Should a cooperative withhold consent for a sale, Intro 407 would require the board to provide prospective purchasers with a written statement detailing the rationale for each and all reasons for not consenting to the sale, certified by a member of the board.

Under Intro 407:

- The cooperative would be required to: (1) identify each element of the purchase application that the board found to be deficient, (2) explain how the application failed to meet specific policies, standards, or requirements of the cooperative, and (3) specify any negative sources that the board used in forming the conclusions that led to each reason listed.
- Each explanation would need to be structured to enable the prospective purchaser to attempt to remedy the cited deficiencies.

- An individual board member would be required to affirm and certify under penalty of perjury that no members of the board considered reasons other than those provided.
- The board would be limited solely to the information provided in the written explanation if the decision is challenged in court.
- Stiff penalties would be imposed on cooperatives whose boards fail to comply, and the certifying board member could be charged with perjury.

CNYC fully supports New York City's strong anti-discrimination laws and offers classes on Admissions Policies and Procedures as well as Corporate Best Practices. We are pleased to say that we are unaware of any actions brought by the Human Rights Commission in the last decade for discrimination in co-op admissions, indicating the success of education.

CNYC strongly opposes this legislation, which would severely hamper the ability of volunteer board members to act on their fiduciary responsibility, limit the cooperative's ability to defend itself in court, and place undue liability on the individual certifying board member, who is an unpaid volunteer working for the benefit of all shareholders in their cooperative.

This bill is highly unlikely to have any impact on discrimination in admissions given the already small number of rejections. On the other hand, the acceptance of even one shareholder who does not regularly pay their bills, is disruptive, is unwilling to participate in a small building, and/or does not follow established policies and laws, can have an outsized impact on every other shareholder in a cooperative. This is a major concern as it is virtually impossible - and very costly - to evict uncooperative shareholders once admitted.

Intro. 438-2024

Intro 438 would authorize any prospective buyer with an accepted offer to request multiple financial documents and private information from the cooperative corporation, including unaudited reports, information that is subject to change for reasons beyond the control of the cooperative, and working documents that are only available to board members who are held to a fiduciary responsibility.

CNYC encourages sellers and their agents to share audited financial statements with prospective purchasers as part of best practices.

However, this bill does not require the sharing of audited data, and **CNYC strongly opposes the legislation.** Much of the information this bill would require boards to distribute is only found in confidential working documents, shared only with board members who have a fiduciary responsibility to preserve its confidentiality. Boards are currently unable to accurately predict the cost of capital work. Change orders, changes in cost and supply availability, changes in laws and regulations, actions of neighboring buildings, and the insurance and mortgage markets, all impact the cost of ongoing and planned capital projects. Cash flow situations are variable and depend on timing.

Requiring cooperatives to disclose such information will increase costs, and place an additional strain and possible liability on boards, their management companies and individual board members. Finally, prospective purchasers do not have standing to request documents from a cooperative and should instead address their requests to the seller or the seller's agents.

Intro. 1120-A-2024

Intro 1120-A would set timelines for the admissions process in cooperatives, including smaller, self-managed buildings. It requires cooperatives to provide written acknowledgement of receipt of a purchase application within ten calendar days, along with a statement as to whether the application is complete or what other information is required. Within 45 days (with some exceptions and provisions for extensions) of the acknowledgement of receipt of a complete application the cooperative must advise the prospective

purchaser whether it consents to the sale unconditionally, whether consent is granted conditionally or whether consent is denied. Failure to comply with the deadlines will be deemed an approval of the purchase.

CNYC acknowledges the effort at evenhandedness in Intro 1120-A, but still opposes its passage. We believe that better education for boards in their responsibilities in the Admissions Process will succeed far better than trying to impose a one-size-fits-all timeframe on the very diverse cooperative universe in New York City. CNYC is also very concerned about the issue of stating that an application is 'complete' just days after it is received. Review of an application regularly turns up questions that require applicants to submit additional materials to substantiate information that was provided.

79 East 79th Street Corp.

79 East 79th Street
New York, N.Y. 10075

November 28, 2025

Councilmember Julie Menin
Council District 5
250 Broadway
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Councilmember Keith Powers
Council District 4
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Adrienne E. Adams, Speaker
City Hall
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Council Member Gale A. Brewer
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1 Centre Street 15th Floor North
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Amanda Farias
778 Castle Hill Avenue
Bronx, NY 10473
district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 79 East 79th Street Corp., a cooperative corporation that is home to 15 families. Our cooperative is managed by a volunteer board—neighbors with full-time jobs—who dedicate significant time and effort to maintaining our building's infrastructure, finances, and the safety of our homes.

The Value of Cooperative Governance

Cooperatives have demonstrated remarkable resilience through multiple economic cycles. Even during periods of economic stress, defaults rarely increase, largely because boards carefully vet purchaser applications to ensure buyers are financially qualified and community-minded. This diligent review process is central to the stability and success of cooperatives. Our board's collective, long-term perspective allows us to make capital investment decisions that benefit the building and its residents, rather than focusing on short-term profit. This approach has contributed to the overall improvement of housing quality in New York City over the past several decades.

Increasing Challenges for Cooperative Boards

At the same time, our operating costs continue to rise each year due to an ever-growing number of regulatory requirements imposed by the City, as well as increased insurance premiums, wages, real estate taxes, and utility costs. Volunteer boards like ours are increasingly burdened by the need to manage and address these mandates.

Objections to Proposed Legislation

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not address a demonstrated problem. Discrimination is already illegal in New York City, which recognizes 17 protected classes, and there is no data indicating that housing cooperatives

are more likely to discriminate in their admissions practices than private landlords. In fact, according to the New York City Commission on Human Rights, co-op claims make up only a small portion of housing discrimination claims. Against this backdrop, the proposed legislation is excessive and threatens to undermine the very qualities that have made housing cooperatives successful contributors to the City's revitalization.

Rather than cataloging every objection, we wish to highlight the most significant concerns with each bill—those that would most materially and negatively impact our cooperative by increasing costs, intensifying management burdens, and undermining our ability to ensure that purchasers are qualified and positive additions to our community.

Int. No. 407 – Disclosure of Reasons

This bill would require boards to provide detailed written statements explaining why a prospective purchaser was rejected or why conditions were placed on a purchase. We object for several reasons:

- The requirement applies not only to outright rejections but also to situations where conditions are imposed, such as requiring a maintenance escrow for borderline financial qualifications or standard conditions for trust ownership.
- The mandated disclosures could embarrass purchasers and complicate the sales process, as sellers may face delays if purchasers attempt to "remedy" deficiencies.
- The bill invites disputes over whether the stated reasons are "sufficient," increasing the likelihood of litigation and undermining the deference traditionally given to board decisions.
- Requiring a unified statement of reasons from a collective board risks inaccuracies and intra-board conflict, which could be exploited in legal disputes.
- The need for officer certification under penalty of perjury, combined with source-citation and disclosure requirements, increases personal risk for board members and may raise Directors & Officers insurance premiums, discouraging qualified volunteers from serving.

Int. No. 438 – Financial Disclosure

Currently, boards provide prospective purchasers with the last two years of audited financial statements, which is standard practice. This bill would go much further, requiring extensive financial disclosures on accelerated timelines to individuals with no established connection to the building. Our concerns include:

- The bill would require disclosure of sensitive financial information to anyone with an accepted offer, even before a contract is signed, with no requirement for confidentiality.
- This could result in the cooperative's budget, reserves, and capital plans being shared publicly, creating reputational harm, negotiating disadvantages, and security risks.

- The information required exceeds what is regularly provided to shareholders and may not be readily available, necessitating the creation of new documents and the disclosure of "planned" capital improvements, which could lead to disputes over what qualifies as "planned."
- Volunteer boards and managing agents would face increased workloads and professional fees to assemble complex financial packets on short notice, with penalties for even minor, good-faith delays.
- Broad dissemination of sensitive data could chill sales, fuel speculative claims, and increase D&O insurance premiums.

Int. No. 1120 – Applications, Requirements, and Deadlines

This bill would standardize applications and impose strict decision timelines. We object for the following reasons:

- The 10-day acknowledgment and completeness notice would require new tracking systems, additional staffing, and strict calendaring. Minor delays could trigger noncompliance, generating disputes and costs.
- If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information and undermining prudent review.
- Strict adherence to fixed criteria would prevent boards from making sensible exceptions for promising first-time buyers or unique circumstances, undermining equitable access and community judgment.
- Requests for additional information outside standardized forms could be challenged as impermissible, increasing disputes over process rather than focusing on substantive qualifications.

Conclusion

We respectfully urge the Council to reconsider these bills and not pass them. Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Jay Fingerman

As agent for 79 East 79th Street Corp.
On behalf of the Board of Directors

BOARD MEMBER SAMPLE LETTER

12/1/2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair
Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Int 407, Int 438, and Int 1120-A

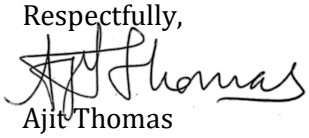
Dear Speaker Adams, Chair Sanchez and Members of the City Council:

I serve as a Board Member of 102 West 85 Ltd, a cooperative located in Upper West Side, Manhattan. I am writing in strong opposition to Int 407, Int 438, and Int 1120-A.

Our building relies on volunteer board service, careful admissions processes, and responsible financial planning. These bills threaten our ability to govern responsibly by exposing volunteers to litigation, forcing disclosure of sensitive information, and imposing rigid governance standards unsuitable for our building.

These measures will increase legal risk, raise operating costs, and discourage volunteer participation. I urge the Council to reject these bills.

Respectfully,



Ajit Thomas
Board Member, 102 West 85 Ltd

December 1, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

I respectfully submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

I serve as president of my co-op board, a volunteer body that dedicates countless unpaid hours to safeguarding our building's financial stability and the well-being of our community. We are neighbors serving neighbors. Cooperative housing is one of New York City's most successful and enduring homeownership models, providing affordable, well-managed housing to hundreds of thousands of working- and middle-class residents.

While I appreciate the Council's intention to promote transparency, Intro 407 is misguided and would cause significant unintended harm to the very communities it aims to protect.

The bill is premised on the notion that co-op boards routinely act with bias or discrimination. That assumption is unfounded and unfair. Housing discrimination is already illegal—and vigorously enforceable—under city, state, and federal law. Our board takes these obligations seriously and rigorously adheres to them.

Rather than improving fairness, Intro 407 would undermine the cooperative housing system by:

- **Exposing volunteer board members to personal liability** for decisions made in good faith as part of their fiduciary duties.

- **Creating a litigation roadmap**, as mandated written explanations for denials would invite frivolous or retaliatory lawsuits.

- **Driving up D&O insurance premiums**, increasing operating costs and ultimately making co-op living less affordable.

- **Discouraging volunteer participation**, as shareholders become reluctant to serve when every decision carries heightened legal and financial risk.

- **Eroding essential board discretion**, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

Taken together, these impacts would raise costs, weaken governance, and destabilize thousands of cooperative buildings citywide.

Intro 407 does not close a legal gap—it creates one. It replaces trust and community-based service with bureaucracy and legal exposure. Rather than advancing fairness, it would threaten a proven, community-driven homeownership model that has supported New Yorkers for generations.

I urge the Council to reject Intro 407 and instead work in partnership with co-op boards, property managers, and housing advocates to develop policies that genuinely strengthen affordability, accountability, and community stability.

Thank you for your consideration.

Very truly yours,

Kelly E. Buzby

Kelly Buzby
President, Board of Directors
[redacted]
200 W 108th Street
New York, NY 10025
[redacted]

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

I submit this testimony in strong opposition to Intro 407-2024, which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Gia Curatola, Director
201 E. 62nd Street Corp

From:	Colson, Brandon on behalf of Speaker Adams
To:	Testimony
Subject:	FW: [EXTERNAL] Letter in Opposition to Intro 407-2024
Date:	Tuesday, December 2, 2025 3:55:12 AM

From: Sheryl Michels <sherylmichels@gmail.com>
Sent: Monday, December 1, 2025 11:26 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>; District14 <District14@council.nyc.gov>; District18 <District18@council.nyc.gov>; District5 <District5@council.nyc.gov>; gethelp@advocate.nyc.gov
Subject: [EXTERNAL] Letter in Opposition to Intro 407-2024

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

I submit this testimony in strong opposition to Intro 407-2024, which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Sincerely,

Sheryl D. Michels, Secretary

201 E. 62nd Street Corp

Written Testimony Against Intros 407, 438, and 1120

I am writing to you concerning City Council's Intros 407, 438, and 1120. I am Co-op Board President of 326 West 83rd Street. We are a small building of 26 units. Many of our shareholders are on fixed incomes. They are not wealthy. Our Board focuses on mitigating the maintenance burden especially for these shareholders.

For the past several years our insurance premiums have skyrocketed more than 25% each year, requiring us to increase the maintenance. It is our largest budget line item after our mortgage. We've spoken to our insurance broker who has informed us that these new proposals will add to that burden. It will expose Co-ops and their Boards to frivolous law suits. And it will increase our legal fees. All requiring our insurance to cover more liability. It is yet another city council measure that makes the city less affordable.

The new requirements on justifying rejections will basically disallow any considerations for our community that would lead us to reject an applicant. Another provision requires us to respond to an application in 10 days. Maybe you're unaware but we are not paid for serving on the Board. We have families, work, other commitments. Of course, we try to be efficient and respond because sellers and buyers request that. We don't need a bill that will open us up to penalties to get us to respond.

In addition to the financial and legal implications, your bills will disincentivize anyone to serve on the Board given the personal legal peril it imposes. These are already thankless volunteer jobs especially when dealing with a 130 year-old building like ours. It is difficult now to recruit shareholders to serve on the Board. These bills will make that even more difficult.

Finally, I would ask you to provide evidence as to the impetus for these bills? Is this a pervasive problem and causing harm to a broad swathe of your constituents? (By the way, we have rejected only one applicant in the 20 years I've served on the Board for valid reasons I'd be happy to elaborate on.)

Do you understand that this will impose additional financial and legal burdens on thousands of your constituents who live in co-ops?

These statutes will make it increasingly unaffordable for your constituents in co-ops to live here. Please, please do not proceed with these bills.

December 1, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair
Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407, Intro 438, and Intro 1120-A

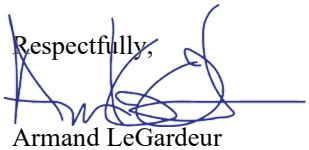
Dear Speaker Adams, Chair Sanchez and Members of the City Council:

I serve as a Board Member of 390 Riverside Drive Owners Corp., a cooperative located in Manhattan. I am writing to urge you to vote against Introduction 407, Introduction 438, and Introduction 1120-A.

Applicants to our cooperative undergo a rigorous and fair review process. The protections these bills purport to provide would not improve that process, but instead would increase legal exposure for board members and the coop, discourage volunteer service, raise operating costs, complicate admissions procedures and undermine the cooperative model.

Our building relies on cooperative shareholders to volunteer to serve on the board. We have established careful admissions processes, and we carry out responsible financial planning. These bills threaten our ability to govern responsibly by exposing volunteers to litigation, forcing disclosure of sensitive and necessarily projected, rather than confirmed, information, and imposing rigid governance standards that do not fit our building. These bills would increase our building's expenses and discourage shareholders from serving on the board. I strongly urge the Council to reject these bills.

Respectfully,



Armand LeGardeur
Board Member, 390 Riverside Owners Corp.

390 Riverside Owners Corp.
390 Riverside Drive
New York, NY 10025-1831

November 28, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair
Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Int 407, Int 438, and Int 1120-A

Dear Speaker Adams, Chair Sanchez and Members of the City Council:

I am a member of the Board of Directors for 390 Riverside Drive Corporation, and I'm writing to express my strong opposition to Int 407, Int 438 and Int 1120, the proposals that will be considered at the Committee on Housing and Buildings on December 2nd.

All of these proposals are unnecessary, intrusive, and will make the jobs of volunteer Board members more difficult. Int 407 in particular is virtually an invitation to frivolous lawsuits by unsuitable purchasers who want to override good-faith decisions that are made after careful and impartial review.

In addition, these proposals will drive purchasers away from co-ops toward other forms of ownership, including condominiums, which will be held to a lower standard. Requiring additional and unnecessary documentation will make a paperwork-intense process even more onerous, and the rigid timelines that are proposed would place an unfair burden on the small teams of volunteers who already do their best to be prompt and responsive.

Serving as a Board member is a thankless task already. These proposals will make it harder to attract shareholders to serve in this volunteer role, the role more difficult and subject to increased risk, discouraging shareholders to serve in the future.

Our current system isn't broken, and it does not need fixing – co-ops are already subject to federal, state, and local anti-discrimination laws, including the NYC Human Rights Law. These proposals would degrade the admissions process by adding bureaucracy, risk, encouraging frivolous lawsuits and drawing out the process they are meant to streamline. These proposals also would increase our operating costs, by driving up our already-high insurance premiums, for no tangible benefit whatsoever.

I strongly urge the Council to reject these bills. Please contact me if I can provide further information.

Regards,

Michael Bulger
Director, 390 Riverside Owners Corp.

390 Riverside Owners Corp.
390 Riverside Drive
New York, NY 10025-1831

December 1, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair
Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Int 407, Int 438, and Int 1120-A

Dear Speaker Adams, Chair Sanchez and Members of the City Council:

I serve as a Board Member, and Presidfent, of 390 Riverside Owners Corp., a cooperative located in Morningside Heights, Manhattan. I am writing in strong opposition to Int 407, Int 438, and Int 1120-A. I am also an attorney, in practice for more than 40 years as a litigator in New York City. My career includes public service as an Assistant United States Attorney, SDNY (1984-1994), and First Deputy Commissioner of the New York City Department of Investigation (1994-1996)

Our co-op relies on residents to volunteer for board service, which includes oversight of the admissions process, and acting as fiduciaries for the financial interests of all shareholders in our co-op. It is necessary work, but a thankless task. These bills present a threat to our co-op – and to all co-ops – because they would expose volunteers to litigation, force disclosure of sensitive, confidential financial information of shareholders and prospective purchasers, and impose rigid governance standards unsuitable for our building (and others). Moreover, these laws are utterly unnecessary (if the purported aim is to fight housing discrimination). Co-ops are subject to federal, state, and local anti-discrimination laws (including the NYC Human Rights Law) so these proposed enactments add nothing to that framework – except to provide a tool that can be used as leverage against a co-op, generate disputes and costly litigation discovery, and run up legal fees. The legal framework would also –surely – drive up insurance premiums (which are already sky-high).

There is absolutely no reason to single out co-ops (from among other real estate transactions) in this way. These measures, if adopted, will only increase legal risk, raise operating costs, and result in shareholders fleeing from volunteer Board service. I strongly urge the Council to reject these bills.

Respectfully,

Richard W. Mark
Board President, 390 Riverside Owners Corp.

390 Riverside Owners Corp.
390 Riverside Drive
New York, NY 10025-1831

December 3, 2025

The Honorable Pierina Sanchez, Chair
Committee on Housing and Buildings
New York City Council
City Hall
New York, New York 10007

Re: Supplemental Testimony in Opposition to Ints. 407, 438 and 1120-A

Madam Chair:

Thank you for your patience presiding over the December 2, 2025 committee hearing on Int. 407, 438 and 1120-A, and for listening to the hours of testimony. I am submitting these supplemental comments within the 72-hour window for additional testimony.

First: I respectfully submit that the testimony of the representatives from the City Commission on Human Rights and from the Department of Housing Preservation and Development deserves great weight. What these witnesses said **undercuts** the rationale for Int. 407. In response to a direct question from the Chair regarding the results of CCHR investigations of discrimination claims arising from Co-Ops rejecting purchasers, the CCHR witness testified that there were only a "handful" of complaints in this area and, ultimately, identified **one** substantiated case of discrimination in the last five years. Even if one generously assumes that the effort required to pursue a claim deters many people from filing, one substantiated case – not an anecdotal matter, but the sole reported and confirmed result out of many hundreds of CCHR filings (only a handful off which concerned Co-Op denials) – shows this is not a broad problem calling for a broad, legislative solution. The testimony on this point begins at 00:39:01 of the hearing and continues for five or six minutes thereafter; the point was reiterated in response to questions from Member Dinowitz (at approximately 01:12:00).

Second, when Member Dinowitz asked about statistics on Co-Ops rejecting purchasers, the HPD representatives noted that Co-Op sales are private market transactions and that the government does not collect data on board actions (acceptance or rejection). The HPD representative noted, however, that in 2024 there were "just under 7,000 co-op sales." (01:13:00). Suppose that over the course of five years, 30,000 to 40,000 co-op sales occur in New York City. If there was a significant problem of discrimination arising from in co-op denials, one would expect more than **one** substantiated finding of discrimination at the CCHR over a five-year period (even discounting for other avenues of complaint and generously assuming a reluctance of many to file). From the evidence adduced at the Dember 2, 2025 hearing, the problem is unproven, or exceedingly rare. The witness who testified starting at approximately 05:05:00 makes this exact point: several members of the Committee, appeared, in their questions to start from a premise that "everyone knows" or it is "generally known" that there is widespread discrimination associated with Co-Op denials. Not anecdotal evidence or assumptions, however, but the hard numbers from City agencies **refute** that premise (one substantiated case in five years against 7,000 Co-Op sales annually). The Council should not enact legislation where the evidence isn't even sufficient to define the purported problem to be addressed.

Third, some of the members asked whether a statement of reasons would impose such a burden on a Co-Op because, after all the Co-Op knows why it acted and this would simply require sending a memorial of the decision to the purchaser. The statement Int. 407 would require, however, is set up to be a litigation document. As drafted, the legislation calls for a listing of "all reasons" (not a form checklist). The civil rights attorney witness who had worked with the Public Advocate's office on the bill could not have made this clearer: the sworn statement (a problem itself for reasons I stated in my testimony) is intended to cabin the Co-Op and provide a litigation target. It is highly likely that prudent Co-Op Boards will need and call for legal advice in preparing any comprehensive statement of reasons for a denial. Those legal fees are something a Co-Op should not have to incur. Next, assume that the Co-Op provides a sworn statement denying approval for failure to meet the Co-Op's financial standards. In our current, very litigious world a disgruntled seller need not accept that statement at face value. Rather, it provides a ticket to litigation and discovery to probe the truth of the declaration—with the promise of recovering attorney's fees for the purchaser (not to the Co-Op if it prevails). The very design of the legislation invites litigation. (There is also the possibility of a creative attorney attempting to use litigation to freeze transaction pending resolution holding up the seller and the Co-Op. As structured, the legislation gives great negotiation leverage to the purchaser and undermines legitimate exercises of discretion by the Co-Op Board.)

Fourth, regarding the bill that would require co-ops to disclose certain information to prospective purchasers, this matter is **already addressed**, very specifically, in the standard form Co-Op purchase contract used in New York City. Specifically, paragraph 5 of the standard form contract states:

> Purchaser has examined and is satisfied with, or (except as to any matter represented in this Contract by Seller) accepts and assumes the risk of not having examined, the Lease, the Corporation's Certificate of Incorporation, By-laws, House Rules, minutes of shareholders' and directors' meetings, most recent audited financial statement and most recent statement of tax deductions available to the Corporation's shareholders under Section 216 of the United States Internal Revenue Code of 1986, as amended ("IRC") or under any successor statute or any regulations promulgated pursuant thereto), and the Corporation's application required to be completed by Purchaser, if available prior to the date hereof.

In other words, the parties agree that the purchaser has examined relevant Co-Op records and documents or assumes the risk of not having made that examination. A purchaser who wants to review Co-Op documents and financials can get them as a condition of the contract. Because the topic of disclosure is addressed in the parties' contract and there is no need for legislation in this area. One witness testified (at approximately 04:35:00) as to the timing provisions of the standard form contract and how that agreement gives the parties incentives to get the deal done. In contrast, those realtors who testified to instances of being "ghosted" in a transaction admitted that involved a miniscule number of cases (and their experience is principally outside of New York City).

Fifth, the testimony of the witness starting at (approximately) 04:28:00 offers several useful points, including rhetorical questions that elegantly frame the burdens that the proposed legislation would impose on non-profit Co-Ops.

Finally, and returning to the witnesses from the CCHR and HPD: both candidly admitted that their agencies have no expertise in the "transaction timeline" issues to be addressed by Int. 1120-A. The testimony from the non-New York City-based realtors invoking the experience of suburban counties does not deserve significant weight on this point. The number of co-ops in those jurisdictions is a tiny fraction of the number in New York City and the structure and bureaucracy needed to implement effective administrative oversight in the suburbs cannot be compared to what would be required to carry that out in New York City. It would be wrong to burden the agencies with this compliance monitoring assignment when they lack both expertise and resources to carry it out.

Housing discrimination is against the law – no question. Local, state and federal laws address that problem with detailed rules and remedies. Both private actions and government enforcement implement those laws. With respect, the proposed bills would not enhance civil rights enforcement but would impose significant costs and burdens on non-profit residential Co-Ops. For those reasons, I hope that the Council will not enact these proposals.

If the Chair has any further inquiries or would like further elaboration on any of these points, I would be happy to provide it.

Respectfully,

Richard W. Mark
Board President, 390 Riverside Owners Corp.

580 West End Avenue Corp
580 W End Ave
New York NY 10014

November 25, 2025

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district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 580 West End Avenue Corp. a cooperative corporation that is home to 17 families. Our cooperative is managed by a volunteer board—neighbors with full-time jobs—who dedicate significant time and effort to maintaining our building's infrastructure, finances, and the safety of our homes.

The Value of Cooperative Governance
Cooperatives have demonstrated remarkable resilience through multiple economic cycles. Even during periods of economic stress, defaults rarely increase, largely because boards carefully vet purchaser applications to ensure buyers are financially qualified and community-minded. This approach has contributed to the overall improvement of housing quality in New York City over the past several decades.

Increasing Challenges for Cooperative Boards
At the same time, our operating costs continue to rise each year due to an ever-growing number of regulatory requirements imposed by the City, as well as increased insurance premiums, wages, real estate taxes, and utility costs. Volunteer boards like ours are increasingly burdened by the need to manage and address these mandates.

Objections to Proposed Legislation
We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not address a demonstrated problem. Discrimination is already illegal in New York City, which recognizes 17 protected classes, and there already exists a mechanism for addressing any problems. Further, there is no data indicating that housing cooperatives are more likely to discriminate in their admissions practices than private landlords. Against this backdrop, the proposed legislation is excessive and threatens to undermine the very qualities that have made housing cooperatives successful contributors to the City's revitalization.

Rather than cataloging every objection, we wish to highlight the most significant concerns with each bill—those that would most materially and negatively impact our cooperative by increasing costs, intensifying management burdens, and undermining our ability to ensure that purchasers are qualified and positive additions to our community.

Int. No. 407 – Disclosure of Reasons
This bill would require boards to provide detailed written statements explaining why a prospective purchaser was rejected. We object for several reasons:

- The mandated disclosures could embarrass the purchaser and complicate the sales process. Further, sellers (who may ordinarily seek a new purchaser if there is a rejection) may be harmed as they may face delays if purchaser attempts to "remedy" deficiencies.
- The bill invites disputes over whether the stated reasons are "sufficient," increasing the likelihood of litigation and undermining court approved deference traditionally given to board decisions.
- Requiring a unified statement of reasons from a collective board risks inaccuracies and intra-board conflict, which could be exploited in legal disputes.

- The need for officer certification under penalty of perjury increases personal risk for board members and, along with increasing Directors & Officers insurance premiums, will discourage qualified volunteers from serving on the board.
- Requiring disclosure of the source of any negative information will undoubtedly cause tremendous embarrassment to the purchaser, and will stifle the flow of true and complete to the Board.

Int. No. 438 – Financial Disclosure

Currently, boards provide prospective purchasers with the last two years of audited financial statements, which is standard practice. This bill would go much further, requiring extensive and costly financial disclosures on accelerated timelines.

- The bill would require disclosure of sensitive financial information to anyone with an accepted offer, even before a contract is signed, with no requirement for confidentiality. This could result in the cooperative's budget, reserves, and capital plans being shared publicly, creating reputational harm, negotiating disadvantages, and security risks.
- The information required seems to require up-to-date information, which will require a tremendous amount of extra expenses due to the additional work required by management and accountants in preparing these complex financial packages on such short notice. In some buildings, there are a dozens of applications each year.
- The disclosure of "planned" capital improvements will only lead to disputes over what qualifies as "planned." Is the mention of a new roof in three years a "planned capital improvement?"

Int. No. 1120 – Applications, Requirements, and Deadlines

This bill would impose unreasonably strict timelines. We object for the following reasons:

- The 10-day acknowledgment and completeness notice would require new tracking systems, additional staffing, and strict calendaring. Minor delays could trigger noncompliance, generating disputes and costs.
- If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information and undermining prudent review. It has been reported in some jurisdictions that such deadlines have resulted in rejections by boards, rather than face a violation of the mandatory deadlines.
- Strict adherence to fixed criteria would prevent boards from making sensible exceptions for promising first-time buyers or unique circumstances,.

- Requests for additional information outside standardized forms could be challenged as impermissible, increasing disputes over process rather than focusing on substantive qualifications.

Conclusion

We respectfully urge the Council to reconsider these bills and not pass them. Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

On behalf of the Board of Directors
580 West End Avenue Corp.

[redacted] November 23, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.

- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

William McGinnis
President

[redacted]

605 Apartment Corp.
New York City, NY 10021

620 Tenants stands in unison with other Riverdale co-op boards in opposing proposed legislative Bills 407, 438, and 1120-A.

These three bills would impose a level of micromanagement on all New York City co-op boards that undermines the autonomy necessary for responsible governance. Co-op boards—made up of resident shareholders who volunteer their time—are already charged with exercising careful judgment and due diligence on behalf of all shareholders. The proposed legislation does not offer guidance; it imposes rigid mandates that restrict each board's ability to address the unique needs and circumstances of its own community.

Our opposition is grounded in practical and significant governance concerns, including:

- **Protection of confidentiality**
- **Realistic timing for board responsibilities**
- **Substantial administrative and staffing burdens**
- **Increased and unnecessary legal liability**

829 PARK AVENUE CORPORATION

829 PARK AVENUE

NEW YORK, NY 10021

December 1, 2025

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Amanda Farias
778 Castle Hill Avenue
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district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Council Members:

We write on behalf of the Board of Directors of 829 Park Avenue Corp., a cooperative corporation which is home to 40 families. Our cooperative is governed by a volunteer board of seven elected members—neighbors with full-time jobs—who devote significant time and effort to managing the building's infrastructure, physical plant, and finances and to maintaining a safe and neighborly environment for all shareholders.

Cooperatives in New York City have demonstrated resilience through economic cycles. Defaults rarely increase in cooperatives during periods of stress, and the community of new shareholders expands with each generation, primarily because boards carefully review purchaser applications with the ability to consider finances as well as the future of the building and the community in which it exists.

We oppose Prospective Bills Int. No. 438, Int. No. 407, and Int. No. 1120. The proposed bills will materially and negatively impact cooperatives by further increasing costs, intensifying management burdens, and creating confusion and potential litigation over the interpretation of vague and subjective terms contained in the proposed legislation.

It is already a challenge to find and retain board members in view of the significant amount of work they must undertake. The chilling effect of potential personal as well as corporate liability for a variety of unmeasurable claims will reduce or eliminate our ability to bring on new board members and jeopardize our ability to maintain the current board. There will be defections from board service and few boards will avoid the inherent chaos that will ensue from the lack of continuity in leadership.

In addition, it will be impossible to comply with a number of the requirements of these proposed bills: the board will not be able to catalogue the thinking of all its members in reviewing an application; the concept of ascertaining whether stated reasons are "sufficient" to decline an application will add further confusion as it is a subjective and impossible standard, and will vary on a case by case basis; and the possibility of challenges, claims and lawsuits for failure to comply with vague terms will inhibit any board's ability to make a decision. The negative consequences of these bills will be far reaching, and will have a harmful impact on the possibility of growth in our neighborhoods.

We have provided above just a few of the many ways in which we believe the proposed legislation would have a devastating impact on the continued operation of cooperatives in New York City. We therefore urge this Council to reconsider these bills and vote against their passage.

Respectfully submitted,

Board of Directors, 829 Park Avenue Corp.

907 FIFTH AVENUE, [redacted]
NEW YORK, NY 10021

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

November 21, 2025

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

I submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While I appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.

- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

I urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Regards,

Ketty Pucci-Sisti Maisonrouge
Shareholder, 907 Fifth Avenue – [redacted]

955 TENANT SHAREHOLDERS, INC.
955 PARK AVENUE
NEW YORK, NY 10028

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

November 12, 2025

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintain their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.
Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.

- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Thomas M Sternberg, President
955 Tenant Shareholders, Inc.
955 Park Avenue
New York, NY 10028

1065 PARK AVENUE CORPORATION

November 21, 2025

Subject: Opposition to Intros 407, 438 & 1120 – "Co-op Transparency Package"

Dear Chair Sanchez and Members of the Committee,

On behalf of the Board of 1065 Park Avenue Corporation, a 93-unit cooperative in Carnegie Hill, Manhattan, we respectfully submit this testimony in opposition to Intros 407, 438, and 1120.

While intended to promote transparency, these bills would impose punitive procedural burdens on volunteer co-op boards, expose them to unnecessary litigation, and increase costs for residents. Co-ops already comply with extensive anti-discrimination laws; these measures would not improve fairness but would discourage participation and weaken good governance.

We urge the Council to reject these bills and instead collaborate with co-op boards and housing professionals on balanced policies that preserve transparency without undermining community-based ownership.

Thank you for your consideration.

Joanne R. Wenig
President, Board of Directors
1065 Park Avenue Corporation
[redacted]

From: [redacted] of Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Opposition to Intros 407, 438, and 1120
Date: Monday, December 1, 2025 6:26:04 PM

From: George Stonbely <gstonbely@spectacularventures.com>
Sent: Monday, December 1, 2025 6:19 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Cc: District14 <District14@council.nyc.gov>; gethelp@advocate.nyc.gov; District18 <District18@council.nyc.gov>; Office of Council Member Powers <kpowers@council.nyc.gov>; District5 <District5@council.nyc.gov>
Subject: [EXTERNAL] Opposition to Intros 407, 438, and 1120

[redacted]

George N. Stonbely
President, Board of Directors
1115 Fifth Avenue
New York, NY 10128

December 1st, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Dear Speaker Adams, Chair Sanchez, and Members of the City Council:

As President of the Board of 1115 Fifth Avenue, I am writing in strong opposition to Intros 407, 438, and 1120.

Although these bills are presented as measures to increase transparency in the cooperative purchase process, they would in reality impose severe and unnecessary burdens on cooperative housing throughout New York City.

Intro 407 is particularly harmful. It requires boards to produce a sworn, detailed written explanation for every rejection within five business days. This demands procedures that are unworkable in practice—co-ops do not maintain formal "rejection files," and assembling unanimous, sworn statements from all involved parties within such a narrow timeframe is often impossible. For volunteer board members, many of whom have full-time jobs, these requirements create real personal exposure and legal risk.

The bill also invites litigation by turning every denial into a potential lawsuit, supported by fee-shifting provisions that incentivize claims regardless of merit. This, in turn, will drive up D&O insurance premiums, directly increasing maintenance costs and diminishing the affordability that cooperative housing is meant to protect. These measures undermine the discretion and fiduciary responsibility that boards must exercise to maintain the financial and operational stability of their buildings.

Importantly, the bills do not solve any genuine problem. Discrimination in housing is already illegal under extensive city, state, and federal laws, and these protections are fully enforceable. Adding punitive procedural traps for volunteer-run, non-profit housing corporations does nothing to enhance fairness, and only destabilizes a system that has served New Yorkers well for generations.

Cooperative housing functions because neighbors volunteer their time and judgment to safeguard their buildings. These bills would deter that participation, compromise sound governance, and increase costs at a moment when affordability in New York City is already under strain.

For these reasons, I respectfully urge the Council to reject Intros 407, 438, and 1120.

Thank you for your consideration.

Sincerely,
George N. Stonbely
President, Board of Directors
1115 Fifth Avenue

1150 FIFTH AVENUE OWNERS CORPORATION

1150 Fifth Avenue New York, NY 10128 | Phone 917-742-4404 | rgmacris@aol.com

November 27, 2025

City Council Speaker Adrienne Adams
New York City Council
City Hall
New York, NY 10007

Re: Opposition to Intro 407, Intro 438 and Intro 1120("Co-op Transparency Package")

Dear Council City Council Speaker Adams:

I am writing on behalf of the Board of 1150 Fifth Avenue, a cooperative residence in Carnegie Hill, to express our strong opposition to the so-called "Co-op Transparency" legislative package—Intro 407, Intro 438, and Intro 1120—now under consideration by the Committee on Housing and Buildings.

These bills, though presented as measures to promote fairness in co-op sales, would have serious unintended consequences for the thousands of volunteer-run housing corporations that sustain New York's neighborhoods.

Our Concerns

- Intro 407 would require sworn, detailed written explanations for any rejected application, exposing volunteer board members to personal liability and creating a roadmap for costly litigation.
- Intro 438 would compel the release of sensitive building financial information to prospective purchasers, inviting misinterpretation and jeopardizing confidentiality.
- Intro 1120 would impose rigid review deadlines and "deemed consent" provisions that fail to reflect the realities of volunteer governance, particularly during holiday or summer periods.

Why It Matters

Co-op boards already operate under stringent anti-discrimination laws at the city, state, and federal levels. These proposals would not enhance fairness—they would discourage community participation, drive up insurance and legal costs, and undermine the stability of one of New York's most effective affordable-ownership models.

Our board members are neighbors serving neighbors, devoting countless unpaid hours to managing finances, capital repairs, and quality of life for our residents. These bills would replace trust and discretion with bureaucracy and legal exposure, weakening the very governance model that has worked for generations.

Our Request

We respectfully urge you to oppose Intros 407, 438, and 1120 and to encourage the Council to collaborate with co-op boards, management professionals, and civic organizations to achieve meaningful transparency without harming the volunteer foundation of co-op life.

Thank you for your attention and for your continued service to our district and community.

Very truly yours,

Richard G Macris

Richard G Macris
President
1150 Fifth Avenue Owners Corporation

Carnegie Hill Co-op Board Testimony Packet

Short Testimony for NYC Council Portal

Subject: Opposition to Intros 407, 438 & 1120 – “Co-op Transparency Package”

Dear Chair Sanchez and Members of the Committee,

On behalf of the Board of 1165 Park Avenue in Carnegie Hill, Manhattan, we respectfully submit this testimony in opposition to Intros 407, 438, and 1120.

While intended to promote transparency, these bills would impose punitive procedural burdens on volunteer co-op boards, expose them to unnecessary litigation, and increase costs for residents. Co-ops already comply with extensive anti-discrimination laws; these measures would not improve fairness but would discourage participation and weaken good governance.

We urge the Council to reject these bills and instead collaborate with co-op boards and housing professionals on balanced policies that preserve transparency without undermining community-based ownership.

Thank you for your consideration.

Arlene Cruz
President, Board of Directors
1165 Park Avenue
[redacted]

Full Letter for Council Submission

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Ana Sanchez, Chair, Committee on Housing and Buildings
The Honorable Jumaane D. Williams, Public Advocate
The Honorable Amanda Farias, Majority Leader
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407, Intro 438, and Intro 1120 ("Co-op Transparency Package")

Dear Speaker Adams, Chair Sanchez, Public Advocate Williams, Majority Leader Farias, and Members of the New York City Council,

We write on behalf of the Board of [Building Name], a cooperative residential community in Carnegie Hill, Manhattan, to express our strong opposition to the package of bills currently before the Committee—Intro 407 ("The Reasons Bill"), Intro 438, and Intro 1120—which would place onerous and unnecessary procedural burdens on cooperative housing corporations across New York City.

While we appreciate the Council's intent to promote transparency, these proposals would have damaging unintended consequences for thousands of volunteer-run co-op boards that already operate under stringent anti-discrimination laws at the city, state, and federal levels.

Why These Bills Are Misguided

1. Intro 407 would require sworn, detailed explanations for any rejected purchase application, exposing volunteer board members to personal liability and creating a roadmap for costly litigation
2. Intro 438 would compel disclosure of sensitive building financial information to prospective purchasers, potentially misrepresenting a building's financial health and violating confidentiality norms.
3. Intro 1120 would impose rigid timeframes and "deemed consent" provisions that ignore the realities of volunteer governance and seasonal scheduling.

The Broader Impact

Cooperative housing has long been one of New York City's most stable and affordable ownership models, providing homes for hundreds of thousands of residents. These volunteer boards—neighbors serving neighbors—devote significant unpaid time to managing building finances, maintenance, and resident well-being. By treating them as potential wrongdoers rather than community stewards, the proposed legislation would discourage participation and increase costs for all shareholders.

Our Request

We urge the Council to reject Intros 407, 438, and 1120 and to engage directly with co-op boards, management professionals, and civic leaders to craft policies that balance

transparency with practical governance. We believe collaboration, not punitive regulation, is the best path forward to support New York's cooperative communities.

Thank you for your consideration and for your continued service to New York City residents.

[Name]
[Title, e.g., President, Board of Directors]
[Building Name]
[Address]
New York, NY 10028

The Board of Directors
1200 Tenant Corp.
1200 Madison Avenue
New York, New York 10128

November 28, 2025

The Honorable Keith Powers
New York City Council, District Four
New York City Hall, 250 Broadway
New York, NY 10007

Re: Opposition to Intros 407, 438, and 1120 (the "Co-op Transparency Package")

Dear Council Member Powers:

I write on behalf of the Board of Directors of 1200 Tenant Corp., a cooperative residence on Madison Avenue in Carnegie Hill. I write to express our strong opposition to the legislative proposals known as the "Co-op Transparency Package"—comprising Intro 407, Intro 438, and Intro 1120—that the Committee on Housing and Buildings is now considering.

While the Committee's objective to promote fairness and transparency in sales of cooperatives is laudable and one that our Board shares wholeheartedly, we respectfully urge that the Co-op Transparency Package is ill-suited to achieve this worthy purpose. Most significantly, we anticipate serious harm that would result from adoption of the Co-op Transparency Package which would significantly outweigh its benefits. Although we have no doubt that these harmful consequences are not intended by the Committee, we wish to bring them to the Committee's attention to eliminate the risk of the Committee's unknowingly acting to the detriment of its cooperative-owning constituents. Specifically, these harmful consequences include:

- ***Increased exposure*** of volunteer board members to time-consuming and ***costly litigation***, including the possible imposition of personal liability for individual board members;

- ***Compelled release of*** sensitive building financial information, including that which may include ***personal and confidential information*** about specific shareholders; and

- Imposition of ***onerous compliance obligations*** upon volunteer board members, many of whom have full-time employment and personal commitments outside of their board service.

Further, these consequences each would engender the secondary consequences of chilling interest in board service and depressing property value—which is especially concerning in the current economic climate. Moreover, the risk of these consequences is not justified by the Co-op Transparency Package's proposed benefits, which can be achieved by other means that do not threaten the same harm. City, State, and Federal anti-discrimination laws govern cooperative boards' review of prospective purchasers' applications (and boards' conduct in other areas, as well). Appropriate enforcement of these statutes is an adequate safeguard against the ills that the Co-op Transparency Package seeks to address and will continue to ensure that cooperatives operate in the fair and transparent manner that the Committee desires. Moreover, these statutes provide

that security without discouraging community self-governance, contributing to increased legal and insurance costs, or undermining a proven model of affordable ownership. The Co-op Transparency Package, if passed, would lead to all of this, decreasing the quality of management and depreciating the financial value of cooperative shareholders' most valuable asset—their home.

Moreover, there are practical considerations which would likely interfere with the Co-op Transparency Package's efficacy. For example, the requirement of Intro 407 that a cooperative board provides a sworn, detailed written explanation for the rejection of any application assumes that a board comprised of several individuals uniformly voted to reject for the same reason. In reality, this is likely often not the case; heterogenous reasoning about board members may often result in a majority agreed upon outcome. To the extent that only "no votes" must provide such an explanation, this creates a disincentive to vote to reject an application that may be at odds with the best interests of the cooperative and its shareholders, to which and to whom board members owe a fiduciary obligation. Additionally, the ambiguity of this requirement makes it difficult for boards to satisfy and incentivizes rejected applicants to find defects in legitimate attempts by a board to explain the reasoning behind its decision. Even the less ambiguous provisions pose compliance challenges by requiring the disclosure of information that many cooperatives do not maintain in the ordinary course of business and, even where accessible, is proprietary and necessarily kept confidential for effective management by a cooperative board.

As another example, the disclosure requirement of Intro 438 would command the release of information about a cooperative's financial well-being, which necessarily entails the release of information about the finances of individual shareholders, including those who have not volunteered for board service. Redaction is not a practical means to address this concern; redactions would either be so extensive as to render any disclosure meaningless or so limited as to provide inadequate protection of individuals' privacy.

One final example is the rigid review deadline proposed by Intro 1120 and the "deemed consent" provisions. These are unrealistic and draconian when contemplated for imposition on volunteer board members with obligations outside of their board service. Indeed, that this proposal does not include any exemptions for holiday periods or other good faith failures to comply in a timely manner suggests that its purpose is purely punitive.

For these reasons, we respectfully urge you to oppose the Co-op Transparency Package, Intros 407, 438, and 1120, and to encourage the Committee to seek to identify alternative means to promote transparency and fairness that will be less burdensome and will not pose the same risks of harm to the volunteer foundation of cooperative living. Thank you for your attention and for your continued service to our District and community.

Very truly yours,

Eric Chilton

Eric R. Chilton
President, Board of Directors, 1200 Tenant Corp.

Please vote against Intro 407, 438 and 1120-A

My name is Katherine O'Sullivan and I am a board member of 1825 RSD Inc. a cooperative with 42apartments in Inwood, Upper Manhattan. I have served on my board 27 years and lived in my cooperative for 32 years.

On behalf of the Board of Directors of 1825 RSD Inc. I want to express our opposition to all three bills under consideration.

These are three misguided bills under consideration by this Committee on Housing and Buildings seek to dismantle the Admissions process in New York City cooperatives -- but their passage will do far more.

- Int 407 threatens the very heart of cooperative living, whereby volunteer board members assume the responsibility of protecting the safety, finances and the quality of life of all shareholders in part through a careful, thoughtful admissions process. The bill penalizes board members with the threat of perjury of carrying out their fiduciary responsibility and exposes them to unnecessary liability and frivolous lawsuits, undermining their ability to act in the best interest of the cooperative and all its shareholders. Intro 407 would discourage shareholders from volunteering to serve on their boards by placing an unacceptable risk of liability on individual board members, who cannot possibly speak to the thoughts and personal correspondence of all other board members. This would greatly strain our operations It is already difficult to find board members to serve.
- The requirements of Intro 407 severely hamper the ability of volunteer board members to act on their fiduciary responsibility to protect their co-op community from uncooperative shareholders. The acceptance of even one shareholder who does not regularly pay their bills, is unwilling to participate, and does not follow established policies and laws, is highly disruptive and can have an outsized impact on every other shareholder in a cooperative. This is a major concern as it is virtually impossible - and very costly - to evict uncooperative shareholders once admitted.
- It is extremely difficult to identify each element of the purchase application a board finds deficient, explain how the application failed to meet specific policies, standards, or requirements of the cooperative, and specify any negative sources that the board used in forming the conclusions that led to each reason listed without incurring potential liability if challenged.
- From a financial standpoint, the bill would lead to higher legal fees, increased insurance premiums, and expanded administrative costs. These additional expenses would ultimately be passed along to shareholders, undermining affordability and threatening the financial stability of our cooperative and other cooperatives across the city.

While we appreciate the Council's goal of increasing transparency, Intro 407 would have serious unintended consequences that threaten the stability and affordability of cooperative housing. In short, Intro 407 would harm the communities that exist in housing cooperatives, the only affordable route to homeownership for most New Yorkers

INTRO 438

While we appreciate the Council's goal of increasing transparency and ensuring prospective purchasers are aware of potential expenses, Intro 438 would have serious unintended consequences on housing cooperatives.

Much of the information this bill would require boards to distribute is only found in confidential working documents, shared only with board members who have a fiduciary responsibility to preserve its confidentiality.

- As a board we are unable to accurately predict the cost of ongoing or future capital work. Cash flow situations are variable and depend on timing. The disclosure required in this bill might lead prospective purchasers to rely on projections and unaudited information that we would not otherwise release. The ever-increasing local laws are financially onerous on coops as it is. LL 11 is so costly. One recent cycle was bid and $300K+ yet came in at $850K+. How would the coop have projected this. It was high-rise down town buildings that were a danger to pedestrians, causing LL 11 to come into being. It is now a cash cow for contractors and engineering companies.

- Requiring cooperatives to disclose such information will increase costs in time and money and place an additional strain and possible liability on boards, their management companies and individual board members.

- Finally, prospective purchasers do not have standing to request documents from a cooperative and should instead address their requests to the seller or the seller's agents. This bill seeks to create a relationship where none currently exists.

In short, Intro 438 would harm the communities that exist in housing cooperatives, the only affordable route to homeownership for most New Yorkers.

Int 1120-A seeks to impose a one-size fits-all structure on the vast diversity of housing cooperatives in our city.
It is impractical as each coop, management company and legal council have different variables to deal with. In our coop we act to facilitate as speedy a sale as possible while up holding our fiscal responsibilites

2 December 2025

Dear Members of City Council,

I am writing in whole-hearted support of Int. 1475-2025, CM Bottcher's bill to expand legalization of shared housing. I spent almost nine years of my life living in shared cooperative housing and it was by far the best living arrangement I have ever experienced. I lived in two houses, one with 16 people (owned by a non-profit, Better Housing Colorado) and one with 9 people (renting from a landlord). We all shared a common kitchen as well as living/dining spaces. We had organized structures to allocate labor for running the home, including cooking shared dinners four or five nights a week. Through weekly meetings we democratically made decisions relating to both the immediate and longer term needs of the home and community.

Yet beyond the joy of family-style dinners and the convenience of an organized labor system, it was the connection among housemates – across all kinds of differences – that deeply enriched our lives and fostered lifelong friendships.

I encourage you to support Int. 1475-2025 to legalize more shared housing in NYC. Shared housing can help alleviate the cost burden while also fostering the social connections that we so desperately need more of in this age of increasing isolation.

Thank you for supporting shared housing opportunities,
Alana Wilson
Brooklyn, NY

[redacted]

Alexis Foote
[redacted]
Jamaica, NY 11434
[redacted]

December 2, 2025

Pierina Ana Sanchez (Chair), Shaun Abreu, Eric Dinowitz, Oswald Feliz, Lincoln Restler, Crystal Hudson, Alexa Avilés
250 Broadway, 8th Floor, Hearing Room 1
New York, New York 10007

My name is Alexis Kimberly Foote and today I am here to show my support for City Council Erik Bottcher legislation for Shared Housing Int 1475-2025. Int 1475-2025 shared housing has critical benefits for valuable populations like individuals with mental illness (Kimberly Queena Jones, David Hawkins), the LGBTQ youth from the ages of 16–24-year-old, and senior citizens who have no kids or grown kids. Shared housing allows residents to share the cost of utilities, shared housing allows individuals to save money for a rainy day, it decreases homelessness, and substance abuse.

My Mom Kimberly Queena Jones also known as Mrs. Khan, Nanny, Charlie, and my favorite the Unofficial Mayor of New York City unfortunately, passed away from loneliness, a broken heart and mental illness due to the trauma cause by my husband and the City of New York. If my mom and David Hawkins had shared housing, they would be alive as we speak. David Hawkins and my mom both need each other's companionship, and she lost him to mental illness due to him losing his housing because the landlord was a slum lord of a shared housing rental. Before my mom and I reunited in the 2000's; she lived in a shared housing space own by 'Cooper Union Square" under Odyssey Houses guidance. This is why it is so IMPORTANT to support COPA & TOPA. Karen and my mom were great for each other as far as having non- sexual companionship and holding each other accountable when something wasn't done in the house. They were able to share the cost of living in the house. People in recovery can become codependent on something.

The SRO (Single Room Occupancy) have disappeared due to lack of oversight from the city, the gutting of rent stabilization regulation and policies, and HPD catering to the ultra-rich. New York City caters to the worst of the slumlords, and this is why we have lost so many of our shared housing units. A lot of Shared Housing landlords are scammers, they abuse the system, the residents, and the communities which they own property.

A lot of SRO landlords displace the resident's, by get them arrested, evicted or even kill them by leaving them in hazardous living conditions e.g. (mold, rats, ceiling lacking for years). Many of these buildings have serious repairs that need to be done, however instead of fixing the problem the landlord and the city do what it does best; it abandons these properties causing New York

City homelessness to skyrocket. Shared housing is not right for everyone, families like mine need real housing programs. Rachel needs a shared apartment unit that has 3 bedrooms, living room, bathroom, and all the amenities that a luxury building has when you're paying $4000 or more. My family needs a housing program that respects my paycheck. Shared housing is popular because people can't afford to live by themselves. The rent is too high to live by yourself unless you have a career that pays over $90,000.00.

The City keeps giving The City of New York Department of Homeless Services, HRA, Doe Fund, HELP USA, BRC, Breaking Ground, and Acacias Network money to help family and single adults; however, these groups from my experience exaggerate our problems. BRC failed David Hawkins aka Popo and my mom aka Nanny due to the lack of support from their case managers at DHS and BRC. I had to become a caregiver, advocate, and case manager for my mom and Mr. Hawkins. As a DVS (Domestic Violence Survivor) I realize that New York City loves to fund shelters, jails, and luxury housing for the ultra-Rich. While families are being dragged into a criminal court, family court and housing court. The Commission on Human Right is a useless organization and needs to be audited.

I am calling on the City Council, both Mayor's the old one and new one, and the Governor to maintain and create new housing programs that support the Real New York City. My family and I are residents at the Guy R. Brewer Hotel, HRA is paying $4000 or more. And the faculty is horrible. The faculty is considered a non- cooking faculty, which means that my family and I are spending all our money on fast food and doesn't live space for me to save money.

Once again, Int 1475-2025 shared housing has critical benefits for valuable populations like individuals with mental illness (Kimberly Queena Jones, David Hawkins), the LGBTQ youth from the ages of 16–24-year-old, and senior citizens who have no kids or grown kids. Shared housing allows residents to share the cost of utilities, shared housing allows individuals to save money for a rainy day, it decreases homelessness, and substance abuse.

Alexis Foote
[redacted]
Jamaica, NY 11434
[redacted]

December 3, 2025

Pierina Ana Sanchez (Chair), Shaun Abreu, Eric Dinowitz, Oswald Feliz, Lincoln Restler, Crystal Hudson, Alexa Avilés
250 Broadway, 8th Floor, Hearing Room 1
New York, New York 10007

Dear Committee on Housing and Buildings

I am neither for or against these bills, however these bills should include transparency and penalties when it comes to the banks system, brokers, and the lenders. These institutions make it difficult for black, brown and indigenous families to become homeowners. There needs to be a way to hold the banking system, brokers and lenders make it very hard to become Cooperative owners.

Thank you for your time and support.

AMY H. GOLDIN, P.A.

1801 SE 3RD AVENUE, UNIT 200 * FT. LAUDERDALE, FL 33316 * 954-224-2672 * AMYGOLDINLAW@GMAIL.COM

December 1, 2025

via link to New York City Council

Re: Follow-Up on Cooperative Board Disclosure Requirements and Discriminatory Rejections

To Whom it May Concern:

I originally reached out to your office in May 2024 regarding my clients' cooperative unit at The Dorchester, [redacted] E. 57th Street, [redacted], New York NY 10022, which faced four rejections of qualified purchasers. At the time, I inquired about efforts in New York City to mandate disclosure of a cooperative board's reasons for rejecting prospective buyers. I am encouraged to hear that your office is continuing to examine this issue.

After my brief communications with your office, my clients decided to send a forceful letter to the board. A copy of that letter is attached.

While the letter itself does not state this explicitly, I believe it is important to highlight that the four previously rejected applicants were all individuals with surnames suggesting origins from other countries. My clients hesitated to raise this issue directly at the time with the board of the cooperative for fear of retaliation or further delays in selling their unit. Nonetheless, the pattern of rejections raises serious concerns about potential discriminatory practices in the board's decision-making process. The last names of the applicants were:

First applicant: Wong
Second applicant: Mayorga
Third applicant: Ng
Fourth applicant: Siyanova

Most, if not all, of the applicants were living in the US, employed, and had strong financial qualifications.

After this attached letter was sent, the board granted a second interview to the fourth applicant and eventually approved the candidate but with additional restrictions and terms.

As detailed in the letter to the board, my clients suffered significant financial losses as a result of these unexplained rejections. We strongly support your office's continued efforts to review cooperative board accountability and to advance transparency requirements—especially those

requiring boards to provide specific, written reasons when rejecting an applicant. Such measures would promote fairness, discourage implicit bias, and protect owners and buyers alike from the uncertainty my clients experienced. It also would save sellers substantial time and money by allowing them to understand in advance any identified weaknesses so they can avoid submitting additional applicants who may be rejected for the same undisclosed reasons. In this case, my clients incurred financial harm not only from market changes and ongoing carrying costs, as described in their attached letter to the board, but also in attorneys' fees they incurred each time a contract was negotiated.

Thank you for your attention to this matter and for the work your office is doing to foster equity and transparency in cooperative housing.

Sincerely,

Amy Goldin
Amy H. Goldin, PA

May 20, 2024

Via email to: mcapraro@bhsusa.com
mlevy@bhsusa.com

Board of Directors
The 57th St. Dorchester, Inc.
c/o Maria Capraro
Vice-President Account Executive
Brown Harris Stevens Residential Management, LLC
770 Lexington Avenue
New York, NY 10065

Re: Dorchester, Unit 9E, 110 E. 57th Street, New York, NY 10022

Dear Directors,

We are the trustees of the Joyce H. Strelitz Revocable Trust, owner of Unit 9E, and are compelled to write this letter after almost 50 years of Strelitz Family ownership and 4 applications for transfer of title.

In 2018 we submitted two applications from prospective purchasers of our Unit 9E. They were rejected. In 2020 we submitted a 3rd. It was rejected. Recently, we submitted our 4thapplication from a prospective purchaser. That too was rejected.

Four applications. Four rejections. Each application was for a potential buyer with good stable employment, good credit, and presenting a financial package that seasoned and successful brokers and members of the Real Estate Board of New York (REBNY) endorsed as fitting and appropriate for the Dorchester and an equivalent market.

After our 2nd rejection, we asked Maria Capraro for a better understanding of the Board's two rejections so we could present a package that the Board would accept. After having conveyed our request to the Board, Ms. Capraro got back to us apologizing that she really could not give us a definitive answer – or any feedback whatsoever.

Just recently we (Bonnie) had 2 phone conversations with Veronique Monier regarding the 9E rejections. Bonnie's purpose, which she stated in no uncertain terms, was to better understand after 3 rejections how we could ensure that the next package presented would meet the Board's requirements and would be accepted. After the 2 conversations and after Ms. Monier requested access to the Unit via Stephen McConnell (access granted, although that really should

be irrelevant, other than to the consideration of the purchaser), Ms. Monier never responded to us with any specific feedback; complete silence after our good faith efforts.

You should be advised that since our first application:

- The contracted price has decreased by over $[redacted].
- We have incurred $[redacted] in carrying costs, and
- The cash proceeds from the 1st rejection would conservatively have generated more than $[redacted] of return.

In sum, the Board's rejections have cost us upwards of $[redacted].

The Board's refusal to provide any reasonable guidance, not even the slightest feedback, in tailoring our sale guidelines to its expectations, and the Board's unjustified decisions have cost us a fortune. We respectfully demand a reconsideration of our current application, who now is improving her financial offer by being willing to post 2 years' of maintenance fees into escrow with the Corporation.

We are very aware that NY cooperatives are cloaked in secrecy. Under current law, the reasoning behind the Board's decisions do not as of yet have to be disclosed. But please note that we are no longer able to accept these rejections complacently, and we will take any actions deemed necessary to exercise our right to transfer real property.

We cannot state strongly enough that we sincerely hope you will reconsider our most recently-rejected applicant in light of the additional assurances she graciously has been willing to provide.

Furthermore, we reiterate our desire to understand the Board's rationale for the rejections and its expectations for acceptable applications.

Respectfully.

Bonnie Brand and Brian Strelitz,
as Trustees of Joyce H. Strelitz Revocable Trust

Written Testimony to the New York City Council
Committee on Housing and Buildings
Int. No. 1475

Submitted by Ann Shalof

Committee Chair Council Member Bottcher and Committee Members:

I am submitting testimony in support of the passage of Int. No. 1475, A Local Law to amend the administrative code of the city of New York, the New York city building code, and the New York city fire code, in relation to shared housing.

For ten years, until September 2025, I served as Chief Executive Officer of Neighborhood Coalition for Shelter, Inc. (NCS), a nonprofit organization providing housing and supportive services to unhoused New Yorkers and New Yorkers at risk of homelessness. In that capacity, I oversaw the operation of supportive residences for single adults in a range of configurations, including an older traditional SRO and a pilot program serving unhoused CUNY students in shared housing.

One size seldom fits all, and that is certainly true of housing options. Different housing solutions work for different populations and at different stages of life. If properly constructed and regulated, SROs and shared apartments can be ideal for students, young adults starting out (they do this anyway!), and for seniors needing companionship or unable to live alone – to name a few examples. In the midst of an unprecedented shortage of affordable housing, it is imperative that we embrace every suitable option – and Int. 1475 is a major step in this direction.

Int No. 1475 acknowledges and accounts for situations that already exist informally. Young adults, as well as others, frequently share apartments with roommates. In that scenario, a single individual may be the leaseholder, with all the accompanying obligations to the landlord; the roommates have no real rights or protections. Alternatively, all the occupants may be on the lease and faced with a potential crisis should one of them leave or create circumstances that result in eviction. Informal shares may include makeshift partitions or other adaptations that can make them unsafe. Int. No 1475 will ensure that shared units are safe and suitable for occupancy and that each tenant's residency rights are protected.

Shared housing is not without challenges. At NCS Scholars, NCS's pilot residence for unhoused and housing-insecure college students, residents have private bedrooms in 2- and 3-bedroom suites with shared kitchen and bathroom facilities. Before launching the pilot, NCS developed clear rules and guidelines around guests, maintenance of shared space, etc. and shared them with each potential resident prior to acceptance of a unit. Conflicts that do arise are mediated with the help of on-site program staff. Outside a program or supportive context, building staff will likely need to include a tenant relations specialist.

The existence of communal facilities in the building encourages students to study together or commute together to school. Because NCS Scholars residents have a common purpose they have a basis for developing community.

NCS has also operated the NCS Residence, an older traditional SRO, since 1985. The NCS Residence is supportive housing for chronically homeless adults, most of whom have a serious mental illness, substance use disorder or both. Residents have small individual units – bedrooms – along a corridor and share hallway baths, a communal kitchen and lounge areas. While the units are small, for many residents they are a first home after lengthy stretches of homelessness. Tenants speak of the residence as “home” and have built relationships and community.

While shared housing may not be ideal in many instances, it can be a welcome alternative to shelter, couch surfing, sub-standard housing, and similar makeshift arrangements. It can also be a first step on the path to a more desirable housing situation. Given the acute shortage of affordable housing, it is an option that should be available, and individuals should have the ability to determine for themselves whether it is an acceptable option for their situation. Int. No. 1475 will help ensure it is a safe and well-regulated option.

I urge the Council to adopt Int. No. 1475.

Thank you for your consideration.

From: [redacted] Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Opposition to Intro 407, the "Reasons Bill"
Date: Wednesday, December 3, 2025 7:20:36 AM

From: Anne Holbach [redacted]
Sent: Wednesday, December 3, 2025 7:15 AM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Opposition to Intro 407, the "Reasons Bill"

[redacted]

Dear Speaker Adams:

Re: Opposition to Intro 407 (“The Reasons Bill”)

I am writing to express my strong opposition to Intro 407-2024, known as the “Reasons Bill." Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings’ financial and physical health. While we appreciate the Council’s intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

I urge the Council to reject Intro 407.

Sincerely,

Anne Holbach
[redacted]
New York, NY 10022

December 1, 2025

Please Oppose Int. 407, 438, and 1120A

Dear Council Member:

I am a shareholder of 61 West 9 Tenants Corp., a/k/a "The Windsor Arms," a cooperative housing corporation located at 61 West 9th Street, Manhattan. I'm writing to express my opposition to Int. 407, Int. 438, and Int. 1120A, and I urge you to vote against these bills in their current form.

These bills would place heavy and unnecessary burdens on cooperatives, including intrusive disclosure requirements of unaudited financial information, arbitrary and strict timelines that volunteer boards cannot always meet, and potential penalties that would deter many individuals from volunteering to serve on cooperative boards. In fact, these requirements would prove difficult—if not impossible—for volunteer board members to meet without risking serious personal liability.

These bills will cause unintended harm and irreparably damage the cooperative housing model, which currently provides hundreds of thousands of New Yorkers with access to safe and affordable housing. They risk disrupting stable coop operations without meaningfully improving transparency. I respectfully urge you to vote against these bills in their current form and to work with cooperatives and residents to develop more balanced solutions.

Thank you for your consideration.

Sincerely,

Annette Stover
[redacted]
New York, NY 10011
[redacted]

Dec 1, 2025

Subject: Hearing on Shared Housing

My name is Arlene Rush. I was born and raised in New York — Parkchester in the Bronx and then Queens — and I have lived most of my adult life in Chelsea. I grew up middle class and at 22 I moved into a rent-stabilized studio because I was fortunate to sublet a studio apartment into Manhattan. I'm now 70 and live in an affordable lottery apartment in Peter Cooper Village which I am not at all happy in. That said I still consider myself fortunate, but I only moved there at 69 because I no longer would qualify for SCRIE and my name came up from a list. Social Security's COLA went up, but SCRIE income eligibility didn't increase the same way. Being forced to leave the neighborhood where I built a community for over 30 years was one of the hardest things I've had to do and a lief changer (not a good one).

Because of my age and limited income and being an artist the idea of being required to take roommates — at any level — is alarming. I am not homeless, but I worry these proposals do not create homes. They create refuge or a dormitory. Human beings need privacy, a place to store food, a clean bathroom, and dignity. Asking strangers to share a refrigerator, a bathroom, or a kitchen — and to endure lines for showers or bathrooms — does not give people a true home. It creates instability and stress, and it raises real health and safety concerns when living habits and standards differ.

The proposal as presented lacks essential details and safeguards. Showing a plan without room sizes, clear pricing, and operational standards is not enough to demonstrate acceptable quality of life.

Among my specific concerns:

• Cost and funding: How much will these units cost to build and operate? Where will the public subsidies come from? Who is paying and how long will funding last?
• Eligibility and fees: Who qualifies for these units, and how will eligibility be assessed? Are rents going to be in the $1,547–$2,488 range? Do you expect people experiencing homelessness to be able to pay those rents? People living on SS too? Students?
• Alternatives: Why not use public funds for more Section 8 vouchers or rapid rehousing, and ensure landlords receive payments promptly so they will rent to voucher holders instead of discriminating?
• Quality and design: How is this different from dorm living? The illustrations I've seen look dorm-like. Who determined the "best practices" for shared housing? Have the

planners lived in or worked closely with people who will actually live this way? If not, how can they anticipate the obstacles that will appear?
• Families and long-term residents: Studios historically served as starter homes for single people. Families and long-term residents are being pushed out of the city by high costs, tiny square footage, and declining quality of life. Adding more micro / shared units does nothing to address why families leave.
• Safety, privacy, and enforcement: How will peaceful living be monitored and protected so that people can sleep, work, and think? Will the city be policing noise and disputes? Noise complaints are one of the top issues in housing — what concrete plans exist to prevent and address them?

There is a rush to implement new models, but haste should not come at the expense of humane housing. We must ensure that any new housing approach provides durability, dignity, and real paths to stable homes — not temporary dorms that mask the deeper failures of our affordable housing system.

Thank you for considering my testimony. I urge you to slow down, provide full specs and consult people with lived experience, and prioritize proven solutions that keep families, singles and seniors housed with privacy and dignity.

Sincerely,
Arlene Rush
[redacted]
NY NY 10010

From: Office of Correspondence Services
To: Testimony
Subject: FW: Intro 407 Corporate Transparency Bills Letters in Opposition
Date: Monday, December 1, 2025 7:54:55 PM
Attachments: 0 Combine ALL.pdf

From: Babette Krolik <BKrolik@TerraHoldings.com>
Sent: Monday, December 1, 2025 6:47 PM
To: Office of Correspondence Services <OfficeofCorrespondenceServices@council.nyc.gov>
Cc: Restler, Lincoln <LRestler@council.nyc.gov>; District33 <District33@council.nyc.gov>; Faye Tsai <FTsai@terraholdings.com>
Subject: [EXTERNAL] Intro 407 Corporate Transparency Bills Letters in Opposition

[redacted]

As general counsel to management companies representing hundreds of NYC cooperatives, and as a constituent of District 33 in Brooklyn, I am enclosing nearly 50 individual letters of NYC coop shareholders and boards in opposition to the proposed Corporate Transparency Bills, particularly Intro 407. These NYC residents, and I, are deeply worried about the unnecessary liability, strains, and additional expenses these bills would put on NYC's resident-governed, non profit cooperative housing corporations, at a time when the City is trying to increase affordable housing and the Council is proposing bills to give an option to tenant groups and non profits to acquire housing.
We tried to submit these letters through the portal, but it was not accepting additional submissions.

Babette Krolik, General Counsel
Brown Harris Stevens/Halstead Management
770 Lexington Avenue
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212 508 7233
BKrolik@Terraholdings.com

[redacted]

342 EAST 72ND STREET CORPORATION
340 EAST 72ND STREET
New York, NY 10021

November 25, 2025

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gethelp@advocate.nyc.gov

Amanda Farias
778 Castle Hill Avenue
Bronx, NY 10473
district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 342 East 72nd Street Corporation, a cooperative corporation which is home to 34 families. Our cooperative is governed by volunteer board members - neighbors with full-time jobs - who devote significant time and effort to protect the buildings' infrastructure, physical plant, finances and maintain safe homes for our neighbors.

Cooperatives have demonstrated resilience through multiple economic cycles. Defaults rarely increase during periods of economic stress, primarily because boards carefully vet purchaser

applications to ensure buyers are financially qualified and community-minded. That diligent review process is central to cooperative stability. At the same time, our costs are increasing year after year due, in part, to an ever-growing number of regulatory requirements imposed by the City, increased insurance premiums, increased wages, increased real estate taxes and increased utility costs.

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not solve an existing problem - to the extent they purport to address discrimination, same is illegal with 17 protected classes in New York City.

We do not attempt to catalog all objections in this letter. Instead, we highlight some of the more important objections to each bill - those that would most materially and negatively impact our Cooperative by further increasing costs, intensifying management burdens, and undermining our ability to assure that purchasers are qualified and positive additions to our cooperative community.

Int. No. 407 [Disclosure of Reasons]

We understand the bill would require detailed written statements as to why a prospective purchaser was rejected or why the board elected to place conditions on the purchase. We object to it for myriad reasons, including the following:

1. The requirements would compel disclosures that may embarrass purchasers. Moreover, because information must be provided to allow a purchaser to take steps to remedy deficiencies, this poses a problem for sellers who want to quickly get their apartment back on the market. If a purchaser were to submit information in an effort to "remedy" deficiencies, the bill invites tactical disputes over whether the stated reasons are "sufficient."
2. Forcing boards to articulate and defend "proper and sufficient" reasons invites tribunals to substitute their judgment for that of the board, contrary to long standing deference first articulated by the Court of Appeals in Levandusky v. One Fifth Avenue Apartment Corp. The bill would convert many routine determinations into litigated controversies.
3. A single officer cannot know or certify the full spectrum of what every director considered. Demanding a unified statement of reasons risks inaccuracies and intra board conflict, which litigants may exploit.
4. Preparing a specific denial within days requires counsel's involvement and investigative steps that cannot be compressed without risk of error, inconsistent statements, or inadvertent disclosure of sensitive information - all of which increase litigation likelihood.
5. Officer certification under penalty of perjury, combined with source citation and disclosure requirements, increases perceived personal risk and may raise D&O premiums - discouraging qualified volunteers from serving and weakening governance capacity.

Int. No. 438 [Financial Disclosure]

342 EAST 72ND STREET CORPORATION
340 EAST 72ND STREET
New York, NY 10021

Boards typically provide prospective purchasers with copies of the last two years audited financial statements. This bill goes much further. It would require cooperatives to provide extensive financial disclosures on accelerated timelines to parties who are complete strangers to the building. We object to it for myriad reasons, including the following:

1. The bill would require a board to provide financial information to someone who merely has an accepted offer to purchase shares in the corporation. In other words, the intended recipient is not even a contract vendee. They have absolutely no connection to the building.
2. Notwithstanding that the recipient is a stranger to the building, there is no requirement that the recipient treat the information confidentially, so that the corporation's budget, reserves, and capital plans could be posted publicly or shared on social media, creating reputational harm, negotiating disadvantages, and heightened security and privacy risks.
3. Information presented to a prospective purchaser exceeds what is presented to shareholders on a regular basis. Moreover, this would require the disclosure of "planned" capital improvements to the prospective purchaser, leading to potential litigation of what is "planned" at the time the information is requested. By way of example only, if a board generally discussed that the building would require an elevator upgrade in five years, is that a planned capital improvement to be disclosed?
4. Volunteer boards and managing agents would face expedited work, and professional fees to assemble complex up to the minute financial packets on short notice, with penalties for even minor, good faith delays. The language of the bill may require the boards and agent to create documents that do not currently exist.
5. Line item disclosures about debt, cash flow, and capital improvements can be taken out of context by non experts, chilling sales, fueling speculative claims, and prompting buyers to seek concessions unrelated to a unit's value.
6. Documents to be produced may require legal review, accounting support, and risk management; broad dissemination of sensitive data can elevate claims and may increase D&O premiums.

Int. No. 1120 [Applications, Requirements and Deadlines]

We understand the bill would standardize applications and impose strict decision timelines. We object to it for myriad reasons, including the following:

1. The 10 day acknowledgment and completeness notice requires new tracking systems, more staffing, and tight calendaring. Minor mail delays or holidays could trigger noncompliance despite good faith efforts, generating disputes and costs.
2. If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information. That rigidity undermines prudent review of applicants who want to become a member of the community.
3. Strict adherence to fixed criteria means boards cannot make sensible exceptions for promising first time buyers or unique circumstances, undermining equitable access and community judgment. For example, while a board may have a requirement that an applicant have assets in the amount of X, wouldn't the City Council want the board to be able to make an exception for a first time buyer with high earning power who are buying a small, less desirable apartment in the building.

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4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

(Philip Turbin, President)

Board of Directors, 342 East 72nd Street Corporation

775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

November 20, 2025

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Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 775 Park Avenue, Inc., a cooperative corporation which is home to 48 families. Our cooperative is governed by volunteer board members—neighbors with full-time jobs—who devote significant time and effort to protect the buildings' infrastructure, physical plant, finances and maintain safe homes for our neighbors.

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applications to ensure buyers are financially qualified and community-minded. That diligent review process is central to cooperative stability. At the same time, our costs are increasing year after year due, in part, to an ever-growing number of regulatory requirements imposed by the City, increased insurance premiums, increased wages, increased real estate taxes and increased utility costs.

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not solve an existing problem – to the extent they purport to address discrimination, same is illegal with 17 protected classes in New York City.

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Int. No. 438 [Financial Disclosure]

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775 Park Avenue
New York, NY 10021

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4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Adam Rouse

Shareholder, Apt No. 1/2A

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November 20, 2025

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We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Abby R. Simpson 11/24/25

Shareholder, Apt No. 12B, MR8, MR9

775 PARK AVENUE INC.
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November 20, 2025

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We do not attempt to catalog all objections in this letter. Instead, we highlight some of the more important objections to each bill—those that would most materially and negatively impact our cooperative by further increasing costs, intensifying management burdens, and undermining our ability to assure that purchasers are qualified and positive additions to our cooperative community.

Int. No. 407 [Disclosure of Reasons]

We understand the bill would require detailed written statements as to why a prospective purchaser was rejected or why the board elected to place conditions on the purchase. We object to it for myriad reasons, including the following:

1. The requirements would compel disclosures that may embarrass purchasers. Moreover, because information must be provided to allow a purchaser to take steps to remedy deficiencies, this poses a problem for sellers who want to quickly get their apartment back on the market. If a purchaser were to submit information in an effort to "remedy" deficiencies, the bill invites tactical disputes over whether the stated reasons are "sufficient."
2. Forcing boards to articulate and defend "proper and sufficient" reasons invites tribunals to substitute their judgment for that of the board, contrary to long-standing deference first articulated by the Court of Appeals in Levandusky v. One Fifth Avenue Apartment Corp. The bill would convert many routine determinations into litigated controversies.
3. A single officer cannot know or certify the full spectrum of what every director considered. Demanding a unified statement of reasons risks inaccuracies and intra-board conflict, which litigants may exploit.
4. Preparing a specific denial within days requires counsel's involvement and investigative steps that cannot be compressed without risk of error, inconsistent statements, or inadvertent disclosure of sensitive information—all of which increase litigation likelihood.
5. Officer certification under penalty of perjury, combined with source-citation and disclosure requirements, increases perceived personal risk and may raise D&O premiums—discouraging qualified volunteers from serving and weakening governance capacity.

775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

Int. No. 438 [Financial Disclosure]

Boards typically provide prospective purchasers with copies of the last two years audited financial statements. This bill goes much further. It would require cooperatives to provide extensive financial disclosures on accelerated timelines to parties who are complete strangers to the building. We object to it for myriad reasons, including the following:

1. The bill would require a board to provide financial information to someone who merely has an accepted offer to purchase shares in the corporation. In other words, the intended recipient is not even a contract vendee. They have absolutely no connection to the building.
2. Notwithstanding that the recipient is a stranger to the building, there is no requirement that the recipient treat the information confidentially, so that the corporation's budget, reserves, and capital plans could be posted publicly or shared on social media, creating reputational harm, negotiating disadvantages, and heightened security and privacy risks.
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Int. No. 1120 [Applications, Requirements and Deadlines]

We understand the bill would standardize applications and impose strict decision timelines. We object to it for myriad reasons, including the following:

1. The 10-day acknowledgment and completeness notice requires new tracking systems, more staffing, and tight calendaring. Minor mail delays or holidays could trigger noncompliance despite good-faith efforts, generating disputes and costs.
2. If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information. That rigidity undermines prudent review of applicants who want to become a member of the community.
3. Strict adherence to fixed criteria means boards cannot make sensible exceptions for promising first-time buyers or unique circumstances, undermining equitable access and community judgment. For example, while a board may have a requirement that an applicant have assets in the amount of X, wouldn't the City Council want the board to be

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4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Shareholder, Apt No. 6/7C

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November 20, 2025

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Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 775 Park Avenue, Inc., a cooperative corporation which is home to 48 families. Our cooperative is governed by volunteer board members—neighbors with full-time jobs—who devote significant time and effort to protect the buildings' infrastructure, physical plant, finances and maintain safe homes for our neighbors.

Cooperatives have demonstrated resilience through multiple economic cycles. Defaults rarely increase during periods of economic stress, primarily because boards carefully vet purchaser

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4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Shareholder, Apt No. 8-D

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November 20, 2025

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Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 775 Park Avenue, Inc., a cooperative corporation which is home to 48 families. Our cooperative is governed by volunteer board members—neighbors with full-time jobs—who devote significant time and effort to protect the buildings' infrastructure, physical plant, finances and maintain safe homes for our neighbors.

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4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Shareholder, Apt No. 10B

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November 20, 2025

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Amanda Farias
778 Castle Hill Avenue
Bronx, NY 10473
district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 775 Park Avenue, Inc., a cooperative corporation which is home to 48 families. Our cooperative is governed by volunteer board members—neighbors with full-time jobs—who devote significant time and effort to protect the buildings' infrastructure, physical plant, finances and maintain safe homes for our neighbors.

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Thank you for your attention and for your commitment to sustainable housing policies.

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Board of Directors, 775 Park Avenue, Inc.

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November 20, 2025

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Respectfully submitted,

Ingrid Edelman

Board of Directors, 775 Park Avenue, Inc.

1000 Park Owners Corporation

November 25, 2025

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gethelp@advocate.nyc.gov

Amanda Farias
778 Castle Hill Avenue
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district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 1000 Park Owners Corp., a cooperative corporation which is home to 65 families. Our cooperative is governed by volunteer board members—neighbors with full-time jobs—who devote significant time and effort to protect the buildings' infrastructure, physical plant, finances and maintain safe homes for our neighbors.

Cooperatives have demonstrated resilience through multiple economic cycles. Defaults rarely increase during periods of economic stress, primarily because boards carefully vet purchaser applications to ensure buyers are financially qualified and community-minded. That diligent

review process is central to cooperative stability. At the same time, our costs are increasing year after year due, in part, to an ever-growing number of regulatory requirements imposed by the City, increased insurance premiums, increased wages, increased real estate taxes and increased utility costs.

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not solve an existing problem – to the extent they purport to address discrimination, same is illegal with 17 protected classes in New York City.

We do not attempt to catalog all objections in this letter. Instead, we highlight some of the more important objections to each bill—those that would most materially and negatively impact our cooperative by further increasing costs, intensifying management burdens, and undermining our ability to assure that purchasers are qualified and positive additions to our cooperative community.

Int. No. 407 [Disclosure of Reasons]

We understand the bill would require detailed written statements as to why a prospective purchaser was rejected or why the board elected to place conditions on the purchase. We object to it for myriad reasons, including the following:

1. The requirements would compel disclosures that may embarrass purchasers. Moreover, because information must be provided to allow a purchaser to take steps to remedy deficiencies, this poses a problem for sellers who want to quickly get their apartment back on the market. If a purchaser were to submit information in an effort to "remedy" deficiencies, the bill invites tactical disputes over whether the stated reasons are "sufficient."
2. Forcing boards to articulate and defend "proper and sufficient" reasons invites tribunals to substitute their judgment for that of the board, contrary to long-standing deference first articulated by the Court of Appeals in Levandusky v. One Fifth Avenue Apartment Corp. The bill would convert many routine determinations into litigated controversies.
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4. Preparing a specific denial within days requires counsel's involvement and investigative steps that cannot be compressed without risk of error, inconsistent statements, or inadvertent disclosure of sensitive information—all of which increase litigation likelihood.
5. Officer certification under penalty of perjury, combined with source-citation and disclosure requirements, increases perceived personal risk and may raise D&O premiums—discouraging qualified volunteers from serving and weakening governance capacity.

1000 Park Owners Corporation

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We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

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Board of Directors, 1000 Park Owners Corp.

1000 Park Owners Corporation

November 25, 2025

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Respectfully submitted,

x Helen N. Moses

Board of Directors, 1000 Park Owners Corp.

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775 PARK AVENUE INC.
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November 20, 2025

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1. The requirements would compel disclosures that may embarrass purchasers. Moreover, because information must be provided to allow a purchaser to take steps to remedy deficiencies, this poses a problem for sellers who want to quickly get their apartment back on the market. If a purchaser were to submit information in an effort to "remedy" deficiencies, the bill invites tactical disputes over whether the stated reasons are "sufficient."
2. Forcing boards to articulate and defend "proper and sufficient" reasons invites tribunals to substitute their judgment for that of the board, contrary to long-standing deference first articulated by the Court of Appeals in Levandusky v. One Fifth Avenue Apartment Corp. The bill would convert many routine determinations into litigated controversies.
3. A single officer cannot know or certify the full spectrum of what every director considered. Demanding a unified statement of reasons risks inaccuracies and intra-board conflict, which litigants may exploit.
4. Preparing a specific denial within days requires counsel's involvement and investigative steps that cannot be compressed without risk of error, inconsistent statements, or inadvertent disclosure of sensitive information—all of which increase litigation likelihood.
5. Officer certification under penalty of perjury, combined with source-citation and disclosure requirements, increases perceived personal risk and may raise D&O premiums—discouraging qualified volunteers from serving and weakening governance capacity.

775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

Int. No. 438 [Financial Disclosure]

Boards typically provide prospective purchasers with copies of the last two years audited financial statements. This bill goes much further. It would require cooperatives to provide extensive financial disclosures on accelerated timelines to parties who are complete strangers to the building. We object to it for myriad reasons, including the following:

1. The bill would require a board to provide financial information to someone who merely has an accepted offer to purchase shares in the corporation. In other words, the intended recipient is not even a contract vendee. They have absolutely no connection to the building.
2. Notwithstanding that the recipient is a stranger to the building, there is no requirement that the recipient treat the information confidentially, so that the corporation's budget, reserves, and capital plans could be posted publicly or shared on social media, creating reputational harm, negotiating disadvantages, and heightened security and privacy risks.
3. Information presented to a prospective purchaser exceeds what is presented to shareholders on a regular basis. Moreover, this would require the disclosure of "planned" capital improvements to the prospective purchaser, leading to potential litigation of what is "planned" at the time the information is requested. By way of example only, if a board generally discussed that the building would require an elevator upgrade in five years, is that a planned capital improvement to be disclosed?
4. Volunteer boards and managing agents would face expedited work, and professional fees to assemble complex up to the minute financial packets on short notice, with penalties for even minor, good-faith delays. The language of the bill may require the boards and agent to create documents that do not currently exist.
5. Line-item disclosures about debt, cash flow, and capital improvements can be taken out of context by non-experts, chilling sales, fueling speculative claims, and prompting buyers to seek concessions unrelated to a unit's value.
6. Documents to be produced may require legal review, accounting support, and risk management; broad dissemination of sensitive data can elevate claims and may increase D&O premiums.

Int. No. 1120 [Applications, Requirements and Deadlines]

We understand the bill would standardize applications and impose strict decision timelines. We object to it for myriad reasons, including the following:

1. The 10-day acknowledgment and completeness notice requires new tracking systems, more staffing, and tight calendaring. Minor mail delays or holidays could trigger noncompliance despite good-faith efforts, generating disputes and costs.
2. If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information. That rigidity undermines prudent review of applicants who want to become a member of the community.
3. Strict adherence to fixed criteria means boards cannot make sensible exceptions for promising first-time buyers or unique circumstances, undermining equitable access and community judgment. For example, while a board may have a requirement that an applicant have assets in the amount of X, wouldn't the City Council want the board to be

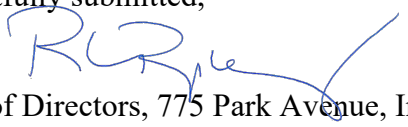
able to make an exception for a first time buyer with high earning power who are buying a small, less desirable apartment in the building.

4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,



Board of Directors, 775 Park Avenue, Inc.

775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

November 20, 2025

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gethelp@advocate.nyc.gov

Amanda Farias
778 Castle Hill Avenue
Bronx, NY 10473
district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 775 Park Avenue, Inc., a cooperative corporation which is home to 48 families. Our cooperative is governed by volunteer board members—neighbors with full-time jobs—who devote significant time and effort to protect the buildings' infrastructure, physical plant, finances and maintain safe homes for our neighbors.

Cooperatives have demonstrated resilience through multiple economic cycles. Defaults rarely increase during periods of economic stress, primarily because boards carefully vet purchaser

applications to ensure buyers are financially qualified and community-minded. That diligent review process is central to cooperative stability. At the same time, our costs are increasing year after year due, in part, to an ever-growing number of regulatory requirements imposed by the City, increased insurance premiums, increased wages, increased real estate taxes and increased utility costs.

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not solve an existing problem – to the extent they purport to address discrimination, same is illegal with 17 protected classes in New York City.

We do not attempt to catalog all objections in this letter. Instead, we highlight some of the more important objections to each bill—those that would most materially and negatively impact our cooperative by further increasing costs, intensifying management burdens, and undermining our ability to assure that purchasers are qualified and positive additions to our cooperative community.

Int. No. 407 [Disclosure of Reasons]

We understand the bill would require detailed written statements as to why a prospective purchaser was rejected or why the board elected to place conditions on the purchase. We object to it for myriad reasons, including the following:

1. The requirements would compel disclosures that may embarrass purchasers. Moreover, because information must be provided to allow a purchaser to take steps to remedy deficiencies, this poses a problem for sellers who want to quickly get their apartment back on the market. If a purchaser were to submit information in an effort to "remedy" deficiencies, the bill invites tactical disputes over whether the stated reasons are "sufficient."
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Int. No. 438 [Financial Disclosure]

Boards typically provide prospective purchasers with copies of the last two years audited financial statements. This bill goes much further. It would require cooperatives to provide extensive financial disclosures on accelerated timelines to parties who are complete strangers to the building. We object to it for myriad reasons, including the following:

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4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

JOHN K-CASTLE MARIANNE S-CASTLE

Shareholder, Apt No. 140/PHD

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November 20, 2025

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Amanda Farias
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Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

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775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

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We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

John K-Castle Marianne S-Castle

Shareholder, Apt No. 140/PHD

Re: Intro 407

November 25, 2025

Dear New York City Council Member,

I live at 11 West 69th Street, a 39 unit cooperative housing building located at 11 West 69th Street, New York, NY 10023.

Intro 407 would **seriously and adversely affect my non profit housing corporation.** The bill:

- **Imposes impossible burdens** – the notice statement, to be sent within 5 business days of a decision, requires impossible steps: most coops do not keep formal records on turn downs; the statement must be detailed and approved by all those involved in the decision, who may difficult to reach; it must be a sworn statement which intimidates the volunteer officers of the coop.
- **Solves no real problem** — discrimination is already illegal and enforceable under existing laws.
- **Creates serious personal liability** for volunteer board members.
- **Invites frivolous lawsuits** with attorney-fee recovery clauses.
- **Raises insurance costs** and exposes boards to punitive fines.
- **Undermines the discretion and fiduciary duty** boards must exercise to protect their buildings and shareholders

I urge you to **reject** this burdensome bill at a time when New York is **trying to encourage more affordable housing, not damage and make more expensive existing non profit housing.**

Yours,

Kosar Jaff

President,

The Board of Directors
11-69 Owner's Corp.

775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

November 20, 2025

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Int. No. 438 [Financial Disclosure]

775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

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New York, NY 10021

4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted, George C Roush / George Roush

Shareholder, Apt No. 1A & 2A

Re: Intro 407

Dear New York City Council Member,

I live at 11W 69th St, a 39 unit cooperative housing building in New York.

Intro 407 would **seriously and adversely affect my non profit housing corporation.** The bill:

- **Imposes impossible burdens** – the notice statement, to be sent within 5 business days of a decision, requires impossible steps: most coops do not keep formal records on turn downs; the statement must be detailed and approved by all those involved in the decision, who may difficult to reach; it must be a sworn statement which intimidates the volunteer officers of the coop.
- **Solves no real problem** — discrimination is already illegal and enforceable under existing laws.
- **Creates serious personal liability** for volunteer board members.
- **Invites frivolous lawsuits** with attorney-fee recovery clauses.
- **Raises insurance costs** and exposes boards to punitive fines.
- **Undermines the discretion and fiduciary duty** boards must exercise to protect their buildings and shareholders

I urge you to **reject** this burdensome bill at a time when New York is **trying to encourage more affordable housing, not damage and make more expensive existing non profit housing.**

Yours,

Veronica Pessino, PhD

Re: Intro 407

Dear New York City Council Member,

I live at 310 West 79th Street, a 36-unit cooperative housing building at 79th street in New York City.

Intro 407 would **seriously and adversely affect my non profit housing corporation.** The bill:

- **Imposes impossible burdens** – the notice statement, to be sent within 5 business days of a decision, requires impossible steps: most coops do not keep formal records on turn downs; the statement must be detailed and approved by all those involved in the decision, who may difficult to reach; it must be a sworn statement which intimidates the volunteer officers of the coop.
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I urge you to **reject** this burdensome bill at a time when New York is **trying to encourage more affordable housing, not damage and make more expensive existing non profit housing.**

Yours,
Lev Gordon

Re: Intro 407

Dear Council Member Abreu,

I live at 800 West End Avenue, an ~89 unit cooperative housing building at 99th Street and West End Avenue in Manhatthan (800 West End Ave, New York, NY 10025). I am a volunteer board member at my cooperative.

I am writing to say that proposed bill Intro 407 would **seriously and adversely affect my non profit housing corporation.** The bill:

- **Imposes impossible burdens** – the notice statement, to be sent within 5 business days of a decision, requires impossible steps: most coops do not keep formal records on turn downs; the statement must be detailed and approved by all those involved in the decision, who may difficult to reach; it must be a sworn statement which intimidates the volunteer officers of the coop.
- **Solves no real problem** — discrimination **is already illegal** and enforceable under existing laws.
- **Creates serious personal liability for volunteer board members**. I cannot state this enough. Board members at co-ops are volunteer posts. Implementing such personal liability will dissuade participation in co-op boards. Why would I be on an un-paid Board if I now have this personal liability risk.
- **Invites frivolous lawsuits** with attorney-fee recovery clauses. Yet another item that will INCREASE COSTS at a time where people are cost-strapped.
- **Raises insurance costs** and exposes boards to punitive fines.
- **Undermines the discretion and fiduciary duty** boards must exercise to protect their buildings and shareholders.

I urge you to **reject** this burdensome bill at a time when New York is **trying to encourage more affordable housing, not damage and make more expensive existing non profit housing.**

Best Regards,

James Grotke Jr

800 West End Ave, Apt 8A

955 TENANT SHAREHOLDERS, INC.
955 PARK AVENUE
NEW YORK, NY 10028

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

November 12, 2025

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintain their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.
Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.

- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Thomas M Sternberg, President
955 Tenant Shareholders, Inc.
955 Park Avenue
New York, NY 10028

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

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A Call to Appear and Be Heard

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Very truly yours,

Carolyn Kee Gamble
President

Two East 98th Street Co., Inc.
1165 Fifth Avenue
New York, NY 10029

November 12, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

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Very truly yours,

Alex Guira

12 Lofts Realty

38 West 26th St

New York, NY 10010

Babette Krolik
General Counsel
770 Lexington Avenue, 4th Floor
New York, NY 10065
Tel: (212) 508-7233
Fax: (212) 508-7638
bkrolik@terraholdings.com

June 13, 2025

Members of the New York State Assembly

Re: S. 7541 New York Transparency Act

Dear Assembly Members,

I represent Brown Harris Stevens and Halstead, two major New York City management companies, representing nearly 400 residential buildings, predominantly condominiums and cooperatives, with over 28,000 residential units in New York City.

At a time when housing affordability is at the top of everyone's concerns, it is peculiar that the New York Legislature would propose a bill that would add a hundreds of thousands of dollars to the cost of operating all New York State non profit owner governed condo and coop housing, for no purpose.

S. 7541 would require condominium and cooperative housing boards and managers to provide *electronically and digitally* to every unit owner all inspections, engineering and architects' reports, and all permits, among other items. All recent inspections, reports, and permits must be provided to buyers when entering into a contract.

This disclosure law not only unnecessarily mandates distributions of inspections, reports, and permits which unit owners already have access to , but imposes enormous costs on management to physically copy and distribute already available records, and to explain the deluge of paper and emails regularly arriving in each unit owner's inbox and mail box.

A typical New York condo or coop must prepare dozens of inspections, reports, and permits each year that relate to mechanical, structural, and repair and renovation issues. There are required Local Law 11, fire safety, parapet, parking garage, elevator, lead based paint, water quality, plumbing, electrical system, boiler, and hazardous substance inspections and reports, to name just a few. Every time any work, other than minor decorating, is done in a building, by the building or an individual owner, a building department permit is required, as well as possible clearances from landmarks and other agencies. This is just a partial list. ***Distributing and explaining all these inspections, reports and permits to every condo and coop resident will cost thousands of dollars and hundreds of hours of management time in every building in New York City and throughout the State. Condos and coops are owner managed and non profit, so every extra dollar for management costs each individual unit owner additional maintenance or common charges.***

And all these additional costs and disclosures are unnecessary . Please note the existing ways that unit owners have to access these records:

- All buyers typically perform due diligence, review condo and coop records, and ask questions of the management company regarding building conditions and finances.
- Much of the information is already on line. In NYC, all permits, and most inspection reports are available through the Department of Buildings website, including dobnow, https://a810-dobnow.nyc.gov/publish/Index.html#!/
- Existing New York State General Business Law, which governs most coops, and the Condominium Law grant unit owners access to coop and condo records, and recent case law has generously interpreted these rights, as long as the inquiry is for a legitimate purpose.
- All unit owners may request of boards and management companies building records, including permits, reports, and inspections and these are generally granted.

Therefore, in order to reduce unnecessary regulatory costs on NYC owner occupied property, we strong urge the Legislature to reject this law. It adds nothing to public safety, but adds considerably to the costs and burdens of managing housing in New York.

Sincerely,

Babette Krolik

775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

November 20, 2025

Keith Powers
211 East 43rd Street
Suite 1205
New York, New York 10017
kpowers@council.nyc.gov

Adrienne E. Adams
City Hall
New York, NY 10007
SpeakerAdams@council.nyc.gov

Pierina Ana Sanchez
2065 Morris Ave
Bronx, New York 10453
district14@council.nyc.gov

Jumaane D. Williams
David N. Dinkins Municipal Building
1 Centre Street 15th Floor North
New York, NY 10007
gethelp@advocate.nyc.gov

Amanda Farias
778 Castle Hill Avenue
Bronx, NY 10473
district18@council.nyc.gov

Re: Opposition to Proposed Bills Int. No. 438, Int. No. 407, and Int. No. 1120 Affecting Housing Cooperatives

Dear Councilmembers:

I write on behalf of the Board of Directors of 775 Park Avenue, Inc., a cooperative corporation which is home to 48 families. Our cooperative is governed by volunteer board members—neighbors with full-time jobs—who devote significant time and effort to protect the buildings' infrastructure, physical plant, finances and maintain safe homes for our neighbors.

Cooperatives have demonstrated resilience through multiple economic cycles. Defaults rarely increase during periods of economic stress, primarily because boards carefully vet purchaser

applications to ensure buyers are financially qualified and community-minded. That diligent review process is central to cooperative stability. At the same time, our costs are increasing year after year due, in part, to an ever-growing number of regulatory requirements imposed by the City, increased insurance premiums, increased wages, increased real estate taxes and increased utility costs.

We respectfully oppose Int. No. 438, Int. No. 407, and Int. No. 1120. These bills do not solve an existing problem – to the extent they purport to address discrimination, same is illegal with 17 protected classes in New York City.

We do not attempt to catalog all objections in this letter. Instead, we highlight some of the more important objections to each bill—those that would most materially and negatively impact our cooperative by further increasing costs, intensifying management burdens, and undermining our ability to assure that purchasers are qualified and positive additions to our cooperative community.

Int. No. 407 [Disclosure of Reasons]

We understand the bill would require detailed written statements as to why a prospective purchaser was rejected or why the board elected to place conditions on the purchase. We object to it for myriad reasons, including the following:

1. The requirements would compel disclosures that may embarrass purchasers. Moreover, because information must be provided to allow a purchaser to take steps to remedy deficiencies, this poses a problem for sellers who want to quickly get their apartment back on the market. If a purchaser were to submit information in an effort to "remedy" deficiencies, the bill invites tactical disputes over whether the stated reasons are "sufficient."
2. Forcing boards to articulate and defend "proper and sufficient" reasons invites tribunals to substitute their judgment for that of the board, contrary to long-standing deference first articulated by the Court of Appeals in Levandusky v. One Fifth Avenue Apartment Corp. The bill would convert many routine determinations into litigated controversies.
3. A single officer cannot know or certify the full spectrum of what every director considered. Demanding a unified statement of reasons risks inaccuracies and intra-board conflict, which litigants may exploit.
4. Preparing a specific denial within days requires counsel's involvement and investigative steps that cannot be compressed without risk of error, inconsistent statements, or inadvertent disclosure of sensitive information—all of which increase litigation likelihood.
5. Officer certification under penalty of perjury, combined with source-citation and disclosure requirements, increases perceived personal risk and may raise D&O premiums—discouraging qualified volunteers from serving and weakening governance capacity.

775 PARK AVENUE INC.
775 Park Avenue
New York, NY 10021

Int. No. 438 [Financial Disclosure]

Boards typically provide prospective purchasers with copies of the last two years audited financial statements. This bill goes much further. It would require cooperatives to provide extensive financial disclosures on accelerated timelines to parties who are complete strangers to the building. We object to it for myriad reasons, including the following:

1. The bill would require a board to provide financial information to someone who merely has an accepted offer to purchase shares in the corporation. In other words, the intended recipient is not even a contract vendee. They have absolutely no connection to the building.
2. Notwithstanding that the recipient is a stranger to the building, there is no requirement that the recipient treat the information confidentially, so that the corporation's budget, reserves, and capital plans could be posted publicly or shared on social media, creating reputational harm, negotiating disadvantages, and heightened security and privacy risks.
3. Information presented to a prospective purchaser exceeds what is presented to shareholders on a regular basis. Moreover, this would require the disclosure of "planned" capital improvements to the prospective purchaser, leading to potential litigation of what is "planned" at the time the information is requested. By way of example only, if a board generally discussed that the building would require an elevator upgrade in five years, is that a planned capital improvement to be disclosed?
4. Volunteer boards and managing agents would face expedited work, and professional fees to assemble complex up to the minute financial packets on short notice, with penalties for even minor, good-faith delays. The language of the bill may require the boards and agent to create documents that do not currently exist.
5. Line-item disclosures about debt, cash flow, and capital improvements can be taken out of context by non-experts, chilling sales, fueling speculative claims, and prompting buyers to seek concessions unrelated to a unit's value.
6. Documents to be produced may require legal review, accounting support, and risk management; broad dissemination of sensitive data can elevate claims and may increase D&O premiums.

Int. No. 1120 [Applications, Requirements and Deadlines]

We understand the bill would standardize applications and impose strict decision timelines. We object to it for myriad reasons, including the following:

1. The 10-day acknowledgment and completeness notice requires new tracking systems, more staffing, and tight calendaring. Minor mail delays or holidays could trigger noncompliance despite good-faith efforts, generating disputes and costs.
2. If acknowledgments are late, applications become "complete" by default, preventing boards from requesting missing or clarifying information. That rigidity undermines prudent review of applicants who want to become a member of the community.
3. Strict adherence to fixed criteria means boards cannot make sensible exceptions for promising first-time buyers or unique circumstances, undermining equitable access and community judgment. For example, while a board may have a requirement that an applicant have assets in the amount of X, wouldn't the City Council want the board to be

able to make an exception for a first time buyer with high earning power who are buying a small, less desirable apartment in the building.

4. If a board seeks additional information outside standardized forms, applicants may claim such requests are impermissible, increasing disputes over process rather than focusing on substantive qualifications.

We respectfully urge the Council to reconsider these bills and not pass them.

Thank you for your attention and for your commitment to sustainable housing policies.

Respectfully submitted,

Shareholder, Apt No. 4A

Re: Intro 407

Dear New York City Council Member,

I live at Wayward Terrace, a 7 unit cooperative housing building at 380 W 12, New York.

Intro 407 would **seriously and adversely affect my non profit housing corporation.** The bill:

- **Imposes impossible burdens** – the notice statement, to be sent within 5 business days of a decision, requires impossible steps: most coops do not keep formal records on turn downs; the statement must be detailed and approved by all those involved in the decision, who may difficult to reach; it must be a sworn statement which intimidates the volunteer officers of the coop.
- **Solves no real problem** — discrimination is already illegal and enforceable under existing laws.
- **Creates serious personal liability** for volunteer board members.
- **Invites frivolous lawsuits** with attorney-fee recovery clauses.
- **Raises insurance costs** and exposes boards to punitive fines.
- **Undermines the discretion and fiduciary duty** boards must exercise to protect their buildings and shareholders

I urge you to **reject** this burdensome bill at a time when New York is **trying to encourage more affordable housing, not damage and make more expensive existing non profit housing.**

Yours,

Michele Herman

Re: Intro 407

Dear New York City Council Member,

I live at Wayne St Tenant unit cooperative housing building at 380 W 12, New York.

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Yours,

Re: Intro 407

Dear New York City Council Member,

I live at 380 W 12th St #6G, a _____ unit cooperative housing building at _____, New York.

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Yours,

Sandeep Kaur

Re: Intro 407

Dear New York City Council Member,

I live at Wayurst unit cooperative housing building at 380 Wolf, New York.

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Yours,

Joseph R Bon

Re: Intro 407

Dear New York City Council Member,

I live at Wayfarer 1 unit cooperative housing building at 380W12, New York.

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Yours,

Kathleen V. Lempert

Re: Intro 407

Dear New York City Council Member,

I live at Wayvest unit cooperative housing building at 3806W12, New York.

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Yours,

17

Re: Intro 407

Dear New York City Council Member,

I live at 380 W.D, apt 1C unit cooperative housing building at Manhattan, New York.

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Yours,

From: Carol H Krinsky
To: Testimony
Subject: [EXTERNAL] Shared housing: YES
Date: Monday, December 1, 2025 10:02:28 PM

[redacted]

The idea of various types of shared housing seems sensible and feasible. It is possible, too, that converting an office building into shared housing will be easier to do than turning office buildings into single-family apartments, although you'd need to consult architects about that. Many architects have warned that not all office buildings are suited to conversion. But if doing a multi-unit apartment makes conversion easier, far more housing can be built than real estate people and architects seem to estimate at the present time.

Here is another thought that might help a small number of usually prosperous families to find the apartments that would keep them in the city, paying local taxes and perhaps even sending their children to public schools. Hundreds of old people live in multi-bedroom apartments, usually three bedrooms and certainly two. The old people who are single really do not need all that space, but as the aparatments are often rent controlled or rent stabilized, they don't want to move. Inertia, too, keeps them where they are. But if a one-bedroom apartment opens in the same building or perhaps on the same block, and if it is rent stabilized or controlled, the elders might move, an idea sweetened by some kind of tax break or other inducement, thereby freeing the larger space for a larger family. This is a minor improvement, but it could be a way to keep prosperous tax-paying families in the city. Would the old person's apartment then be taken off rent stabilization? Maybe, or there might be some way to charge what grandma was paying plus a moving bonus or subsidy for grandma. The new family ought to be thrilled with what they're getting even if they have to subsidize the former tenant's new rent. (The apartment is going to be better than a brand new one anyway, in all likelihood.) The old person's former apartment must not be turned into co-housing. It ought to be used to keep families below billionaire level living within the city. Yes, I know,. This idea needs refinement, but I send it to you for a start.

Cordially,
Carol Krinsky
Prof. Emerita, Art & Architectural History, NYU

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Opposition to Intro 407 ("The Reasons Bill")
Date: Sunday, November 30, 2025 12:03:58 PM

From: Cheryl Fratepietro [redacted]
Sent: Sunday, November 30, 2025 11:02 AM
To: District14 <District14@council.nyc.gov>; Speaker Adams <SpeakerAdams@council.nyc.gov>; Office of Council Member Powers <kpowers@council.nyc.gov>
Cc: Cheryl Fratepietro [redacted]
Subject: [EXTERNAL] Opposition to Intro 407 ("The Reasons Bill")

[redacted]

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
Council Member Keith Powers
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

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Very truly yours,
Cheryl Fratepietro
45 East 72nd Street Co-op Owner and Board member

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Strong Objection to "The Reasons Bill"
Date: Monday, December 1, 2025 2:23:54 PM

From: Christina Polischuk [redacted]
Sent: Monday, December 1, 2025 2:23 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Strong Objection to 'The Reasons Bill'

[redacted]

The Honorable Adrienne Adams, Speaker The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings New York City Council City Hall New York, NY 10007
Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

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Very truly yours,

Christina Polischuk
[redacted] Sutton Place South
NY, NY, 10022

Christina Polischuk
[redacted]

Christopher Leon Johnson
12/2/2025

To the committee on housing and buildings.

My name is Christopher Leon Johnson and I am showing my support for all the introductions that were heard on the dec 2nd hearing including Erik Bottcher Supportive Housing Bill. I am submitting this statement to make a correction on the Person I named which was L.G. Who is the Exective Director of the “Workers Justice Project”. I am calling on the correct CM that serves that district which is Amanda Farias of the 18th District(Morrisanna) to include L.G in the conversation with people that support the bill and who is opposed to the bill because L.G owns a Co-op at 1103 Franklin Ave which is in the Bronx which is ran by UHAB and I believe that her opinions will be the voice of reason with both sides.. I don’t want to sound like a broken Record. I made my statement on the in person testimony. Thank you and Stay Blessed. I just made this testimony to make a correction and show support to every bill that Farias,Bottcher,Williams and Pi Sanchez had heard on 12/2/25.

Christopher Leon Johnson

I am writing in support of legislation to legalize modern shared housing introduced by Council Member Erik Botcher. I am a native New Yorker and have spent my entire adult career in social services working with unhoused children, adults, and seniors. I have worked in several neighborhoods where all kinds of options for lower-income people have vanished all together, Most strikingly the Lower East Side where I worked in the mid 80's and in Bed Stuy Brooklyn where I worked running a large food pantry and soup kitchen from 2011-.2016. We even lost the church beds where folks from drop-in centers could go to a handful of churches and sleep the night. That has ended too since Covid. Apparently new rules made it very hard for churches to comply and offer beds.

I have long been asking for more creative solutions from our elected officials to solve the housing problem that are not just handing over public land to developers to build high rise luxury buildings with big long-term tax breaks for 30% affordable apartments that will usually not be permanent. We will not solve the problem by the recent decision giving 54 blocks in LIC that will produce only 4500 affordable units to the 15,000 the developers will reap. In addition the metrics for determining the affordable income in a neighborhood, once gentrified, changes those incomes substantially. This is another area to work in if we are truly serious about creating affordable housing and not just subsidizing luxury apartments. Affordable is the new buzz word and sadly when one does a deep dive into a development it turns out to offer very little in reality and will never solve the crisis facing very low income or homeless residents that they need and deserve. I am thinking of Chelsea Elliot Houses imminent demolition and redevelopment. Again crumbs will be returned in exchange for the massive give away and demise of public land that should only be used for low-income housing. Last year the plan was for 3 buildings to be torn down and luxury towers to be built. Now it's all 11 buildings. We often do not realize the promises made by these developers. With very little to no accountability by the city. Barclay Center comes to mind. St John's Terminal another. Where the promised number of senior units were not delivered while developers got all their benefits and were not held accountable financially. Soho rezoning promises of affordable housing have not materialized. There are many more examples.

This legislation is a good step in the right direction to opening up new avenues for affordable rentals. Of course the problem now is many of

the buildings like in Bed Stuy that used to offer these single rooms back in the early 2000's are now gone due to gentrification, demolition, and older owners passing away and no family member able to take them over. We are also seeing a massive city-wide plan to keep building building building towers like in the 12 neighborhoods that have seen the lowest development and are now to be fast tracked in the name of affordability as just passed in the recent ballot proposals. This is exactly where we should be trying to preserve lower income housing. There are so many ways to get there if we are truly serious about it and stop promoting the myth that only private developers can save the day. They have not and they will not.

Thank you,
Christy Robb
[redacted]
New York, NY 10014

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

David T. French

Marjorie T French

[redacted] SUTTON PLACE SOUTH [redacted]

NEW YORK, NY 10022

David L. Sugerman
[redacted]
New York, NY 10021

November 26, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
Council Member Keith Powers
New York City Council
City Hall
New York, NY 10007

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By way of background, I have lived in cooperative housing continuously since 1980 (i.e., for 45 years) and have twice served four-year terms as president of my cooperative corporation board. As such, I am very familiar with the process by which boards evaluate prospective purchasers for approval of their applications.

While I appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

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Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations. It would also throw the entire process into a thicket of contentious litigation.

A Call to Appear and Be Heard

I strongly urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

David L. Sugerman

Coop Name:
45 East 72nd Street, Inc.
45 East 72nd Street
New York, NY 10021

From: ed yaker
To: Testimony
Subject: [EXTERNAL] Int 407
Date: Thursday, December 4, 2025 8:48:29 PM

[redacted]

My name is Ed Yaker. I am a long time board member at Amalgamated Houses, the oldest limited equity cooperative in the country. Our admissions are supervised by NYS DHCR, and I do not believe Int 407 will affect us. However, I am a strong supporter of cooperative housing and I fear the Int 407 will do serious damage to co-op housing in New York.

I have heard from several board members at other co-ops that they will probably resign if Int 407 passes as now written. These are good people, unpaid volunteers working hard to help their communities. Having seen the proposed legislation, I would probably not serve on a board that had to deal with Int 407. It is already difficult to get members to serve on co-op boards. 407 imposes burdens and liabilities on co-op board members that will make impossible to find people willing to serve on their boards.

The written requirements, and threats of legal liability for perjury for filing forms in a rushed manner required by the proposed law are severely onerous. Do any members sponsoring this legislation serve on co-op boards? I strongly doubt that.

Cooperatives provide home ownership to many New Yorkers. I hope it is not the goal of the City Council to destroy cooperative housing in New York City.

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

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A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Elizabeth Monaco McCarthy
[redacted] Sutton Place South
New York, NY 10022

Eric Obenzinger
[redacted]
New York, NY 10023
[redacted]

December 1, 2025
RE: Intro 1120-2024 and Intro 0407-2024

Dear City Council Members:

I have spent almost my entire life in co-op apartments in NYC. I have spent most of the last two decades (so far!) volunteering on co-op boards for buildings ranging from 75 to 350 apartments.

My neighbors and my follow-board members reflect many facets of our city, including teachers, tech workers, lawyers, consultants, bankers, bartenders, administrators, academics, writers and filmmakers.

During my two decades as a board volunteer in two buildings, I have reviewed hundreds of co-op admissions applications. I have conducted these reviews with my board peers, who also volunteer their time and labor to make our building comfortable and financially secure.

I write with great concern regarding Intro 1120-2024 and Intro 0407-2024. It's not clear that these injections into private real estate transactions will do anything beyond adding costs and litigation to NY housing.

Based on my long experience as a board member, it's clear these laws will have unintended consequences that will strain board operations and make housing more unaffordable, in the following ways:

1) Timing- We work hard to review most applications within a week or two. That said, it's worth noting that our board is composed of unpaid volunteers, most who have full-time jobs that aren't always compatible with a city-imposed timetable. By burdening us with paperwork and presumption, this legislation will make it more difficult to operate a successful co-op and find qualified volunteers to serve on our board.

Intro 1120 requires boards to signal when an application is "complete" based on a standardized list. While virtually every co-op has a list of application requirements, the reality is many applicants have complex financial records that require clarification. If an application asks for brokerage statements and an applicant submits paperwork for pensions, private assets, crypto holdings or some other kind of less-common asset, there is usually a back-and-forth.

Additionally, requiring a finite review period eliminates our ability to fairly and comprehensively review completed applications. Forcing a building to enter into a binding financial and residential

partnership based on an arbitrary deadline is a recipe for disaster. If boards don't have the time to review or come to a consensus, the clear incentive will be to automatically reject an application.

2) Mandatory statement- I have reviewed hundreds of applications over the last two decades and most have been accepted. I have seen very few rejections; I can count them on one hand. These very few rejections were due to good-faith board judgements about applicant's financial stability.

That said, every application is different. If financial health was black-and-white, a robot could do co-op application reviews. The Council can't pretend that the world of personal finance is simpler than it is.

The requirement for a "mandatory statement" in Intro 0407-2024 will inevitably pressure boards to produce bright-line financial requirements for admission. As fiduciaries who are elected by our neighbors, we will face pressure to explicitly require high incomes/assets to demonstrate that good-faith efforts are being made to protect the co-op's finances. This will make city-wide admission reviews less flexible for hard-working, lower-income people.

***

I appreciate the intention and frustration behind these laws, and realize that some co-ops have not pursued admissions as speedily or fairly as we would all hope. However, it's also worth noting that most co-ops have been diligent stewards of their building's operations. Co-ops have had fewer foreclosures than any other housing type.

This legislation punishes "good" co-ops with paperwork, presumption and legal liability. It also punishes New Yorkers from obtaining a nuanced review of their financial condition, thus limiting their access to homeownership.

Laws already exist that make co-op directors personally liable for proven discrimination. We believe the solution is to make applicants (and board members) more aware of everyone's legal right to a non-discriminatory co-op application process, so that the isolated incidents of discrimination can be exposed and handled by New York's legal system.

I am happy to discuss this legislation further, and will share updates on this legislation with the hundreds of New Yorkers in our building.

Best wishes,

-Eric Obenzinger

Written Testimony

My name is Gary Marton. My wife and I live in a co-op apartment at 56 Garden Place in Brooklyn, N.Y. We have owned and lived there for 35 years, raising a family there. We are self-managed and small - five units per the C of O. All of the units are owner-occupied and ~~five~~ four of the unit-owners are retired. For 25 of the 35 years I have served as the treasurer of the co-op, Fifty-Six Garden Place Corporation.

The three bills should be rejected. Why? We just elected a mayor who ran on a platform of making NYC more affordable. These bills will not make the City more affordable; instead, they will make it less. How? They will do that by increasing the transaction costs of buying a co-op or condo, of selling a co-op or condo, and they will increase the operating costs of co-ops and condos.

Let me illustrate with one example: one bill would require co-ops to do something that they do not have to do now, and that is: when denying an application to buy, the co-op would have to send to the applicant a letter, sworn under oath and stating the reasons for which the application was denied. It would be wholly imprudent for any co-op to issue such a letter, which will be a temptation for litigation, without first having the statement reviewed by a lawyer. And lawyers do not work for free, and the good ones are very expensive, charging hundreds of dollars per hour.

Not only that, but in light of the increased risk of litigation, insurance companies will increase the premiums that they charge for the coverage that they sell to co-ops and condos. And so operating costs will rise. And individual owners of co-ops and condos will have to consider increasing the amount of personal liability insurance that carry in light of the increased risk that they will be named in lawsuits bought by prospective applicants. On these bill, please vote :"No!"

HANKIN & MAZEL, PLLC

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Facsimile 516-482-5803

Testimony of [Your Name]
Before the New York City Council
Committee on Housing and Buildings
Regarding Intro 407 – The "Reasons Bill"

Good morning, Chair and Members of the Committee. My name is Geoffrey Mazel, and I am an attorney with the law firm of Hanken & Mazel, where I have practiced for over forty years. We represent over 25,000 units of co-op and condo housing. I appreciate the opportunity to present this testimony in strong opposition to Intro 407, commonly referred to as the "Reasons Bill."

I have spent my entire professional life of nearly 40 years working with co-ops—communities that provide stable, affordable, long-term housing for millions of New Yorkers. Every day, I witness firsthand the dedication, integrity, and countless hours donated by volunteer board members who serve their buildings. Intro 407 is, in my view, punitive in nature and represents an affront to those very volunteers who make cooperative living in this city possible.

This bill fails on multiple levels. First and foremost, there is no demonstrated problem that Intro 407 meaningfully solves. The co-op application process, though sometimes imperfect—as any system can be—is in fact orderly, efficient, and largely uncontroversial. Instances of abuse or irregularity are exceedingly rare. Yet this bill proposes an intrusive, burdensome, and adversarial regulatory scheme to address what are, in reality, isolated issues. There is already institutions in place, such as the Human Rights commission to enforce current laws against bad actors. Simply put, it is the equivalent of trying to kill a fly with cannon fire.

It imposes layers of reporting requirements and potential liabilities that will only discourage New Yorkers from serving on boards. These boards are already composed of volunteers who, without compensation, take on financial, legal, administrative, and interpersonal responsibilities. Intro 407 treats these individuals not as partners in governance, but as adversaries presumed to be acting in bad faith. That is neither fair nor constructive.

Equally troubling is that this bill was drafted with no input from stakeholders. In fact, quite the opposite. I personally met with the original sponsor, Council Member Jumani Williams's staff, more than eight years ago. I made extensive recommendations, provided proposed edits, and offered to assist in any way I could—free of charge. Not a single one of those suggestions was incorporated. As someone regularly consulted by elected officials at the city, state, and even federal levels for expertise on cooperative housing, I can say without hesitation that this process lacked transparency, collaboration, and good faith. Legislation crafted in a vacuum is always harmful and dangerous—and Intro 407 is no exception.

By contrast, the timing bill introduced by Council Member Farias was developed in genuine consultation with co-op stakeholders. While I believe a few refinements would further improve it—refinements I would gladly discuss following this hearing—the process was open, honest, and rooted in mutual respect. That is how sound housing policy should be crafted.

For these reasons, and on behalf of the countless cooperative communities we serve, I urge the Council to reject Intro 407 and instead pursue legislation that is balanced, thoughtful, and truly responsive to the needs of New Yorkers.

Thank you for your time and consideration.

Respectfully Submitted,

Geoffrey Mazel, Esq.

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From: [redacted] Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Proposed Fair Residential Cooperative Disclosure Law
Date: Wednesday, December 3, 2025 5:59:43 PM

From: gdes123@aol.com [redacted]
Sent: Wednesday, December 3, 2025 5:49 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Proposed Fair Residential Cooperative Disclosure Law

[redacted]

Dear Speaker Adams:

I am a shareholder in the Jefferson Tenants Corp., which owns a building located at 55 East 9th Street, Manhattan, and the President of the Board of Directors for the co-op. I am writing with regard to the Fair Residential Cooperative Disclosure Law (the "Bill"), which contains onerous provisions and penalties for Co-Op Boards and their Members if a Board violates its provisions when rejecting an application to purchase an apartment in a cooperative including the following with our comments about the most troubling provisions in the Bill, which are in bold:

> §8-902 Within 5 days after a rejection, the Board must issue a written statement (the "Statement") of all the reasons and list the number of actions that the Board has reviewed over the previous 3 years, the number of rejections, and the number not acted upon. **Co-Op Board members have families and jobs and other obligations and are not paid to serve on Boards, but this Bill requires the Board members to drop everything they are doing and prepare a comprehensive response in five days**. **This is one size fits all regardless of the size of the building.**
>
> §8-902 The Statement must be certified as accurate and complete by an officer of the Corporation under penalty of perjury. **Who would sign such a statement under penalty of perjury because no one knows the reason why anyone else does anything? Moreover, this Bill will be a bonanza for lawyers suing boards. Why would anyone ever want to serve on a Board? Why wouldn't the Bill provide that the co-op could recover its legal fees and costs if the lawsuit was brought in bad faith or dismissed? Better yet, why is this a private right of action and not the job of the Human Rights Commissions?**
>
> §8-904 The penalty for failure to provide the statement are damages of $1,000 - $25,000 based on the nature of the situation and the "resources of the Co-op corporation." **Isn't this the very definition of discrimination? There would also have to be an evidentiary examination of the corporation's assets to**

determine how large the damages would be.

§8-905 The rejected Purchaser can commence an action in court within 6 months and can receive costs, reasonable attorneys' fees, equitable relief and, if willful, punitive damages. **What if the co-op wins the suit and it is determined that the purchaser lied on the application or hid improper behavior from the purchaser's past? How much vexatious litigation should co-op shareholders have to fund and how long will the D&O underwriters offer insurance at reasonable rates once this Bill is passed?**

§8-906 No evidence can be submitted to the court that was not contained in the Statement. **This means that if the purchaser lied and the Board learns about it during discovery, it cannot be introduced in evidence Does this seem fair to anyone? Whatever happened to Due Process?**

I must note that that there have been no hearings and no evidence that any Board has discriminated against anyone in decades although the City Council moved forward with this legislation, which is extremely unfair to the hundreds of thousands of New York City residents who reside in co-operatively owned housing. Unlike rental housing in which the landlord is responsible for the cost of operating the building and condominium housing, where there is no mortgage on the building and every unit owner pays their own real estate taxes, in a co-op we are all relying on other shareholders to pay their maintenance and assessments or we have to subsidize them. We are also responsible for providing our shareholders with the quiet enjoyment of their apartments notwithstanding the difficulty in getting some shareholders to behave and the impossibility of being able to evict shareholders who fail to pay their maintenance or behave improperly. The only way Boards have of protecting ourselves, our residents and our environment is through the ability to reject purchasers who may not pay their bills or have not in the past or display antisocial or illegal behavior.

Where in this Bill or any Bill that the City Council has ever enacted is there any protection for those of us living in cooperative housing, who have to deal with uncooperative shareholders? Has the Council ever considered the plight of those of us who have to live under these circumstances or our Boards who are responsible for making certain the bills are paid and everyone behaves civilly?

What is worse is that the Council is considering a Bill that will make it impossible for Co-Op Boards to function or to have the funds available to meet the endless new mandates and Local Laws that the Council continues to adopt. Once there was just Local Law 11 which required expensive reports and expensive work every five years and now there are dozens of Local Laws and mandates that we have to satisfy.

This Bill is unfair to all owners of cooperative apartments because it is being fostered on us at a time when there has been no showing that Co-Op Boards discriminate. In fact, the last time there were hearings, the Human Rights Commission reported that there were no complaints filed against Co-Op Boards for discrimination in the proceeding five years. This Bill is a solution to a problem that does not exist and must be defeated.

We also object to Intro 438 which requires that co-ops provide purchasers with information on any "planned" capital improvements, but there was no definition of what is meant by a "planned capital improvement." Ideas come before Boards all the time and this term is so broad that the Board could be sued over anything. How much litigation will the co-op shareholders have to pay before the courts determine what is meant by "planned?"

Additionally, we object to Intro 1120 which requires that within 10 days of receiving material from a prospective purchaser, the co-op must advise a prospective purchaser whether the application

is complete, which means that every Board member must review every application as soon as it is received, which is difficult to do when Board membership is voluntary and Board members have jobs, family and community responsibilities, and have to deal with all the other mandates placed on them by New York City and New York State.

These bills wrongly assume that Co-Op Boards are made up of bigots who routinely deny qualified buyers on the basis of race, color, religion, sexual orientation, or other discriminatory reasons. Nothing could be further from the truth.

Our co-op, as one example of many cooperatives in this City, is made up of several hundred residents—men and women who have same sex partners, are people of color, practice different faiths, and come from many ethnic backgrounds. How is it that our diverse community is thriving if our board routinely denies qualified buyers without compelling cause? The simple answer is that it could not and would not exist. As a resident, board member, and current president of our Board of Directors, I can attest to how difficult it is to attract volunteers for our Board.

Board members are fiduciaries who take responsibility for managing staff and budgets that in some cases rival small public corporations. We are tasked with complying with numerous local laws like LL 11, 84, 87, 97, and 126 to name a few. We regularly interact with Community Boards, the Landmarks Commission, and the Department of Buildings. We donate money to the Washington Park Conservatory to keep our neighborhood park clean and beautiful. We strive to keep our neighbors safe. We always promote camaraderie among our neighbors especially when our neighbors become home bound because of a pandemic or health issues. In short, we board members are not just community leaders, we are the heart and soul of our cooperative. It is yeoman's work.

What we need from lawmakers are well-thought bills to reduce unfunded mandates, to delay the ominous civil penalties called for by Local Law 97 (Intro 913), to vote against the Criminal Search Ban (Intro 632) that denies admission to individuals convicted of serious crimes like homicide, as well as the Good Cause Eviction Bill (S 305).

What we do not need is legislation that is based on supposition, innuendo, and anecdotal evidence that has no basis in fact. What we do not need is legislation that will promote litigation against volunteer board members. What we do not need is legislation that will increase the cost of our D&O insurance policies.

The unsubstantiated opinions of lawmakers should not form the basis of legislation that is an egregious and unjustified attempt to gut the business judgment rule, a legal principle that the New York judiciary has upheld consistently. Moreover, long-standing enacted City, State and Federal laws already vigorously protect the rights of individuals who apply to live in New York City cooperative. A review of New York state and federal law indicates that there has not been a reported case of racial discrimination in almost thirty (30) years. Moreover, in testimony before the City Council several years ago, the New York City Human Rights Commissions reported that they had received fewer than **five** admissions complaints against Co-Op boards in the year prior to that hearing.

I urge all members of the City Council to champion co-op boards and co-op shareholders throughout New York City by voting a resounding **NO** on this Bill.

Thank you for your attention.

Very truly yours,

Gina de Simone

Gina de Simone,

President, Board of Directors

From: Helen Mills
To: Testimony
Subject: [EXTERNAL] I support
Date: Monday, December 1, 2025 5:47:47 PM

[redacted]

I support creating shared housing.

Thank you.

Helen Mills

From:	[redacted] Speaker Adams
To:	Testimony
Subject:	FW: [EXTERNAL] Testimony in Opposition to Intro 407 ("The Reasons Bill")
Date:	Tuesday, December 2, 2025 2:42:07 PM

From: Jacob Krushel [redacted]
Sent: Tuesday, December 2, 2025 2:38 PM
To: District14 <District14@council.nyc.gov>; Speaker Adams <SpeakerAdams@council.nyc.gov>; Office of Council Member Powers <kpowers@council.nyc.gov>
Subject: [EXTERNAL] Testimony in Opposition to Intro 407 ("The Reasons Bill")

[redacted]

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

I submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

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While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

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Instead of improving fairness, Intro 407 would:

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- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning
Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with

bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard
We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,
Jacob Krushel
45 East 72nd Street Cooperative
New York, NY 10021

--
Jacob
[redacted]

From: Jacob van Winkle
To: Testimony
Subject: [EXTERNAL] Testimony in Support of Legalizing Modern Shared Housing
Date: Monday, December 1, 2025 4:39:42 PM

Dear Members of the New York City Council Committee on Housing and Buildings,

My name is Jacob Robert van Winkle, and I am writing to express my strong support for Council Member Erik Bottcher's legislation to legalize modern shared housing.

I am speaking from lived experience. Earlier in my life, I spent extended periods of time without stable housing. I relied on friends' couches for months at a time, in some cases, years. Those years were marked by uncertainty, humiliation, and the constant fear of overstaying my welcome. I was trying to work, finish school, and build a life in New York City, but without consistent, dignified housing options, every other part of life became harder.

A safe, regulated shared housing option would have radically changed my trajectory. It would have given me stability, privacy, and the ability to get back on my feet without depending on the charity of friends or being pushed into unsafe or overcrowded living arrangements. Instead of cycling through couches, I could have had a room, a lock on a door, and the dignity of knowing I was legally housed.

Modern shared housing is a necessary, practical step toward addressing the crisis faced by single New Yorkers. Thousands of us do not need a full apartment to survive. We need safety, predictability, affordability, and a stepping-stone on the housing ladder. Shared housing can provide all of that when it is legal and properly regulated.

Had this type of housing been available during the years I needed it most, my life would have been immeasurably more stable. I support this legislation wholeheartedly, and I urge the Council to move it forward as quickly as possible.

Thank you for your time and your commitment to addressing New York's housing crisis.

Sincerely,
Jacob Robert van Winkle
New York, NY
[redacted]. 10019

To: The Committee on Housing & Buildings
Re: Int. #1475 - Shared Housing

Dear Committee Members,

I believe I speak for a significant portion of an ever-increasing populace of GenXers in saying that reverting to housing structures from the distant past, during which vast majorities of adults were subjugated to SROs by necessity, would not be viewed as progress--in the 21st century.
I first heard of 'Shared Living' and 'Senior Sharing' from Eric Adams after he bandied both about while campaigning along with fellow mayoral candidates during a National Action Network event held at its Harlem-based headquarters, and like other audience members was taken aback. The ideas Adams shot out rapid-fire to see which would resonate I presume seemed lacking of humanity as even a consideration, much less a central focus of concern. I listened dumbstruck, thinking is he serious?

Herding adults together who cannot afford the increasing market rate apartments like horses in stalls? Singles have been singularly singled out historically, and continue to be as gauged by a disproportionate proliferation of studios (listed as 1ba) any online search will bear out. One bedroom apartments aren't prioritized by real estate developers.
The hyper focus must shift from sparse square footage studio 'units' allocated in tax abated, inequitable set-asides in modern hi-risers toward actual affordable, livable one-bedroom dwellings for mature moderate to low-income single working class renters within their communities.

As NY's AARP Director underscored: "It's what's right for people's dignity," in a December 3rd segment of WNYC's 'All Of It.'
The concept is already in effect in NYC despite its legality, evidenced in the sudden deluge of room rental postings.

Meanwhile it's become more difficult to find and secure one-bedrooms below area median income (AMI) in elevator equipped 'luxury' buildings or walkups; even with housing subsidies this demographic unfortunately, is still confined by UNAFFORDABLE skyrocketing rents.
Rates for many studios too small to comfortably inhabit--have also risen considerably alongside the sudden onset of new multiple shared living options. I understand the co-living arrangement isn't meant to be a panacea for groups in young adulthood, grads, or immigrant newcomers, rather than the middle-aged person who prefers to reside independently.

Anyone who has ever SHARED a communal bathroom or kitchen with strangers can probably relate a few horror stories involving adaptive measures and workarounds, including having to lock room doors when needing to use the bathroom, or run out to the corner deli, etc. A former roommate of ex-Congressman George Santos, accused Santos of petty theft.
Bottom line, no one should have to relinquish their dignity in order to maintain independence to afford to live in this city.

Respectfully,
Jean Richardson

TESTIMONY OF JESSE HORWITZ

BEFORE THE NEW YORK CITY COUNCIL COMMITTEE ON HOUSING AND BUILDINGS REGARDING INT 1475-2025 (SHARED HOUSING) DECEMBER 2, 2025

Good morning, Chair Sanchez and members of the Committee on Housing and Buildings.

My name is Jesse Horwitz. I am a resident of Chelsea. I am testifying today in strong support of Int 1475-2025, regarding the creation and regulation of shared housing and rooming units.

I believe this legislation is the most practical solution we have to solve two crises simultaneously: the vacancy crisis in our commercial districts and the affordability crisis in our residential neighborhoods.

The Commercial Opportunity: Solving the "Shadow Vacancy"

First, we must look at where we can build. We are currently sitting on a structural surplus of Class B and C office buildings. The official vacancy rates actually understate the severity of the problem because many spaces are technically "leased" but rarely used.

This "shadow vacancy"—where tenants pay for space they utilize only a few days a week—is devastating our central business districts. The lack of daily foot traffic is causing local retail to struggle, creating dreary blocks and shuttered storefronts in what should be our most vibrant areas.

Rents in these older buildings have fallen well below pre-pandemic levels. The market is signaling that these assets need a new use. Int 1475 unlocks this inventory. By allowing these underutilized assets to be converted into shared housing, we can bring permanent residents back to these neighborhoods to support local businesses 24/7.

The Residential Solution: Freeing Up Family Housing

Second, we frequently hear that the city's top priority is creating more housing for families. While that is the correct goal, I have not seen viable, scalable proposals that can deliver new family units fast enough to meet demand.

The most practical way to create family housing *immediately* is to stop using our existing family stock for roommates.

Currently, because there is no legal housing supply designed for single adults, groups of roommates are pooling their salaries to rent three-bedroom apartments in the outer boroughs. They are effectively outbidding families for family-sized units. These are, in essence, "illegal roommate apartments" born of necessity.

By creating purpose-built shared housing in our commercial districts—closer to jobs and transit—we can draw single adults out of the residential neighborhoods. This will "empty out" those larger apartments and return them to the families they were designed for.

The Historical Precedent

Finally, it is important to correct the historical record. SROs and shared housing were not always marginal housing; they were a mainstream success story we chose to dismantle.

In the 1950s, SROs and rooming units made up nearly 10% of New York City's rental inventory. Buildings like the Barbizon Hotel served as up-market, respectable launchpads for young professionals starting their careers.

We banned this housing typology in the 1960s and 70s because we had a "release valve" that we do not have today: The Suburbs. As mass suburbanization opened up, the city could afford to lose density.

That era is over. The suburbs are full, and restrictive zoning prevents regional growth. We have a massive housing shortage with no suburban release valve. We cannot solve a 2025 crisis with 1970s restrictions. We must restore the flexible housing supply that served this city well for decades.

****

We have empty offices that need people, and single New Yorkers who need homes. The only thing standing between them is outdated zoning. I urge you to pass Int 1475 to unlock this existing square footage for the people who need it most.

From: Joan Starr
To: Testimony
Subject: [EXTERNAL] Shared Housing
Date: Monday, December 8, 2025 1:25:52 AM

[redacted]

To Whom It May Concern,

Please allow shared housing, my husband and I are 80 years old. If my husband passes before I do, I will not be able to afford to stay in my apartment, as I lose my social security, as my husband's is higher. In addition, I don't want to live alone, I would be so lonely.

This current regulation against shared housing affects only those of us with limited means and is just unhealthy and cruel.

Thank you very much.

Joan Starr
[redacted]
NYC 10001
[redacted]

Testimony of John W. Curtis on Bills 407, 438 and 1120-A to the Committee on Housing and Buildings, December 2, 2025

(Expanded version)

Thank you for this opportunity to testify as to pending bills 407, 438 and 1120-A as to the application process in cooperatives.

I am Vice President of the Board of Directors of 370 Riverside Drive (at West 109th Street) and a member of its Finance Committee, which first reviews an application as to the financial resources of an applicant.

Speaking on behalf of our Board, which manages a coop of 75 apartments, many owned by seniors on fixed incomes, I wish to state our opposition to all three bills as currently drafted.

Apart from imposing unrealistic burdens and requirements and raising unwarranted potential risks and costs on coops and boards such as ours, the exposures and additional requirements resulting from the bills could well both encourage boards to adopt highly restrictive financial requirements as a matter of policy – thus potentially disqualifying applicants who might otherwise be approved – while at the same time discourage residents from undertaking the burdens and responsibilities of board membership – which are already considerable given financial and regulatory requirements facing coops in the city. Our Board does not think that the coop application process – which must be thorough to assure that all shareholders can meet their financial obligations and are civil and responsible neighbors – is either (in all but the rarest instances) discriminatory or otherwise unfair so as to warrant the remedies envisioned by Bills 407 and 1120-A.

Bill 407, which we take it is designed to assure non-discrimination by coops, raises numerous concerns while addressing an issue already addressed by strong anti-discrimination laws of which coop boards are well aware.

Whatever the history of discrimination by coops, particularly in their early years, today in New York City coops reject applicants for one of two reasons: 1) in the judgment of the board – usually via the finance committee - the applicant is not clearly able to meet the financial obligations of ownership in the coop – this is the basic consideration - or 2) given other items in the application or interview, issues arise that lead a majority of the Board to consider the applicant(s) problematic in terms of his/her/their prior record as a tenant/shareholder or their attitudes or expectations about the building or its operation. (For example, once an applicant expressed the view that they would fix their apartment expenses, thereby avoiding rent increases – showing no appreciation of the need to meet additional future costs of the building).

Given those fundamental realities of the reasons for rejection, the need for the bill is very doubtful. Further, the bill seems designed to encourage lawyers to sue given its provisions for attorneys' fees. In light of that exposure, insurance and legal costs for coops would likely increase. There is finally a very odd provision: that the bill exempts small coops – the very coops most likely to be more homogeneous in their makeup while being on the less expensive side – so perhaps more attractive to less wealthy buyers from protected classes.

If this kind of bill is needed at all, it should provide for something like the check the box reasons for rejection as is the case in

Westchester, provide for investigation of such statements by the NYC CCHR, not through private litigation, and apply to all coops.

That leads to Bill 1120-A, setting specific time requirements on coops in responding to applications. As an initial matter, please consider that, while volunteer boards may not be the most efficient and fast acting bodies, they do in fact have good reason to move applications along in the interests of the building and their fellow shareholder trying to sell an apartment. As to the mechanics: it often takes longer than 10 days to determine whether an application is complete and to request more or clarifying information. Second, given the complexities of evaluating personal financial information – which may not be either clear or found complete once a thorough review and debate have been had – then evaluating whatever additional material may be submitted and then arranging interviews (which can take a week or more to achieve), a hard and fast deadline of 45 days is neither realistic nor fair. Further, the idea that missing such deadlines amounts to approval is a totally unfair and excessive sanction and could lead to disputes as to good faith, timing, etc. (Consider also the position of a shareholder forced upon a coop by the sanction provision of the bill when then living there as a neighbor.)

Having said that, a bill requiring coops to acknowledge receipt of applications, either rejecting or scheduling an interview within 60 days unless the coop communicates before then the need for more information, thus suspending the time requirement until submitted, and announcing a final decision within 10 days of the interview s would be a requirements that coops could deal with. Sanctions for failing to do so could be fines administered by the

CCHR or HDP in amounts designed to incentivize coops to comply.

Those two bills as currently drafted will together create serious exposure to and costs for boards and coops, in addition to discouraging board membership and very likely limiting board flexibility in dealing with applicants with marginal finances. If a truly clear need existed that would be one thing. But boards are conscious of – and our case, committed to – the requirement of non-discrimination in evaluating applicants, and we are aware of no substantial evidence of ongoing discriminatory conduct by coop boards. Furthermore, our decisions as to applications are made withing reasonable time – usually within 4 to 6 weeks of application.

Finally, as to Bill 438: We regard this bill as both overreaching and unworkable. Buyers, using their brokers and attorneys to assist them, should be entitled to no more information from boards than the board minutes – which indicate issues the board has been dealing with - audited financial information, the Prop Lease, By-Laws and House Rules. Asking boards to disclose projections – under a set time line - "any and all" draft plans and the like is to entitle one prospective shareholder over all the current shareholders in the building – and all this even before the applicant has been found financially acceptable. In any case, few boards, if any, have at all times such information updated and readily at hand – complicating meeting the timing requirements of Bill 1120-A. The bill raises the real prospect that boards could face ex post facto claims as to incompleteness and inaccuracy in light of subsequent developments and changes in spending needs and priorities. Finally, although under the bill a buyer

would have to have already signed a contract to purchase, the bill appears to assume that the buyer would then be able to decline to proceed – an option that, the best of our knowledge, most purchase contracts today would not clearly provide. If anything, prospective buyers could use information as to future capital needs of buildings before making an offer. But such a prospect raises a series of very difficult questions as to how coops (even larger ones with management companies) could respond to such requests, including as to the good faith of requestors, time of response, how extensive information must be and what future time frame must be addressed – let alone prospective liability for such information. And, once again, exempting smaller coops – hard put to respond - might well deny such disclosure to less affluent buyers. (The federal SEC and public companies have struggled with such issues for years.)

As we have indicated – while we question to need for such bills given our knowledge of coop practices - there are some reasonable alternatives to Bills 407 and 1120 along the lines we suggest. Solving the issue of what “forward looking” information buyers of coops might be provided in any realistic manner is a much more difficult problem, but 438 is not an appropriate approach.

We therefore urge you to reject these bills as drafted.

Thank you.

From: [redacted] Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Please support Int 0407-2024, 0438-2024, and 1120-2024
Date: Tuesday, December 2, 2025 7:19:22 AM

-----Original Message-----
From: Jonathan Mack [redacted]
Sent: Tuesday, December 2, 2025 4:36 AM
To: Brewer, Gale <GBrewer@council.nyc.gov>; Adams <Adams@council.nyc.gov>
Subject: [EXTERNAL] Please support Int 0407-2024, 0438-2024, and 1120-2024

[redacted]

Ms. Brewer and Mr. Adams:

My name is Jonathan Mack; I'm a constituent, at [redacted] W 55th St[redacted], New York, NY 10019. I'm writing in support of Int 0407-2024, 0438-2024, and 1120-2024. Purchasing a co-op unit in New York City is extremely intrusive and stressful. The application process requires near-complete disclosure of one's entire financial history, assets, and income. Once an application is complete and submitted, a board can take as long as they like to render a decision on it. And while a board can't deny an application based on discrimination (with respect to race, color, national origin, etc.), they don't have to give a reason for a rejection, effectively allowing them to deny a sale for any reason they'd like. These bills would attempt to correct the above: they would require co-ops to give at least some of the same type of financial information they require from applicants, review applications in a timely manner, and give reasons why they've rejected applicants.

Opponents of these bills claim an increase in compliance time, cost, and liability, but I believe this will be negligible, and I say this as a current co-op unit owner and previous building Board of Governors member. Even if the costs are not negligible, and are ultimately passed to unit owners like me, I'm happy to pay them to help level the playing field between unit buyers/sellers and the buildings. Finally, any transfer of power from buildings to buyers/sellers will help lessen the NYC housing crisis, even if only in a small way, which is in itself a good thing.

I hope you will support these bills. Thank you for your time.

Jonathan Mack

From: Joseph Camardo
To: Testimony
Subject: [EXTERNAL] SRO legislation
Date: Monday, December 1, 2025 3:59:08 PM

[redacted]

Mr. Bottcher
Thank you for introducing this bill. I support this effort.

This concept resembles some college dormitories. Sometimes the roommates have a good relationship, sometimes they do not.
How will co residents choose to live together in these houses? And, I know it would be very difficult, but has the city been able to receive input from the people who would be the inhabitants?
My concern is that as difficult as it will be to build these houses, in my opinion it may be more difficult to maintain them and support cooperative living environment.

Thank you

Joseph Camardo

Sent from my iPad

Date: December 2, 2025

To: New York City Council, Committee on Housing and Buildings

Re: Testimony, Comments on Int 407-A, Int 438-A, Int 1120-A

Cooperative Residence: **4077 Owners Corp.**
40 West 77th Street, New York, NY 10024

Thank you chair Sanchez, and members of the committee. My name is **Joseph Garcia**, and I am a **board member, vice-president, and shareholder** of **4077 Owners Corp.**, an UWS co-op of nearly 100 apartments with many retirees, seniors, and widows. I am here to express my concerns regarding three bills. Although conceived with good intent, careful and thorough consideration of downstream consequences points to a disastrous outcome for the nearly one million NYC co-op residents.

Intro 407 (Public Advocate Williams) imposes **nearly impossible constraints** on the admissions process and discourages board service – a voluntary, elected, unpaid, uncompensated position. Co-ops would spend excessive legal, insurance, and administrative fees to assure board members, costs ultimately passed to shareholders. Or in place of boards with discretionary decision-making capacities, fee-for-service companies using rigid and sterile AI-based algorithms will be used to exclude many applicants, a process forced because of the legal liabilities that this bill will lead to. If passed, the consequence will be increased costs passed on to co-op residents as well as less diverse, equitable, and inclusive co-op communities.

Intro 438 (City Council Housing Chair Sanchez) mandates release of **unofficial** working documents, financial estimates, or fiscal statements to prospective purchasers regarding planned capital improvements, an undefined term that places co-ops at increased risk for litigation. This bill will stifle responsible and pro-active discussion of pending projects by co-op boards including those imposed because of NYC, NY state, or federal government requirements. If passed, the consequence will be reticent boards adverse at discussing potential or likely projects and their preliminary cost estimates.

Intro 1120-A (City Council Majority Leader Farias) imposes **unrealistic timelines** and **impedes the fiduciary responsibility** of co-op admissions. It effectively forces boards in some cases to consider inaccurate, inconsistent, incomplete or fraudulent applications. It ignores the chain of processes that is required for an application to be completed. Moreover, it places all responsibility on the co-op board, even though the board has no control over most if not all these processes. If passed, the consequence will be forced acceptance of possibly irresponsible or even dangerous individuals, anyone of whom could threaten the environment, finances, and safety of our most vulnerable co-op residents.

In summary, **these three bills contain fatal flaws** that will undermine affordability and threaten financial stability of vulnerable residents in our and other co-ops across the city. Moreover, the punitive terms dictated by these bills dehumanize co-op board members, who often have jobs, family and community responsibilities. Despite arguments made by their proponents, Intro 407-A, 438-A, and 1120-A assume most co-ops and their board members act in a discriminatory and malfeasant manner. However, the testimony and records from the Human Rights Committee argue quite strongly to the contrary. Acting on hearsay is not a responsible manner to govern, legislate, or judge. Given these concerns, **we respectfully urge the Council to reject Intro 407-A, 438-A, and 1120-A**.

NYC co-ops are a shining example of how well communal housing functions when managed by and for the people. You are now informed of the risks if any one of these bills are passed. The NYC co-op legacy is now in your hands. Thank you for your attention and consideration.

Letter Of Concern to New York City Council Members and City Officials

Date: 11/22/2025

To: **CITY COUNCIL HOUSING CHAIR: Pierina Ana Sanchez**
2065 Morris Avenue, Bronx, NY 10453
Phone: (347) 590-2874
Email: mvillalobos@council.nyc.gov (*FOR URGENT MATTERS)

PUBLIC ADVOCATE: Jumaane D. Williams
David N. Dinkins Municipal Building
1 Centre Street, 15th Floor North. New York, NY 10007
Hotline: (212) 669-7250
Email: gethelp@advocate.nyc.gov

CITY COUNCIL MAJORITY LEADER: Amanda Farias
778 Castle Hill Avenue, Bronx, NY 10473
Phone: (718) 792-1140 (*CALL FOR URGENT MATTERS)
Email: district18@council.nyc.gov

CITY COUNCIL MEMBER: Gale Brewer
563 Columbus Avenue, New York, NY 10024
Phone: (212) 873-0282
Email: gbrewer@council.nyc.gov

BOROUGH PRESIDENT OF MANHATTAN: Mark Levine
1 Centre Street, 19th Floor, New York, NY 10007
Phone: (212) 669-8191
Email: mlevine@manhattanbp.nyc.gov

From: **Christine and Joseph Garcia**
[redacted]
NY, NY 10024

Re: (1) Fair Residential Cooperative Disclosure Law (Int. 0407/2024);
(2) Sales of Cooperative Apartments (Int. 438/2024); and
(3) Cooperative Timing Law (Int. 1120/2024)

Dear Council Member/City Official:

We are **shareholders in 4077 Owners Corp.**, which owns a building located at **40 West 77th Street, New York, NY 10024**. We are writing regarding the Fair Residential Cooperative Disclosure Law (the "Bill"), which contains onerous provisions and penalties for Co-Op Boards and their Members if a Board violates its provisions when rejecting an application to purchase an apartment in a cooperative. The following are our comments about the most troubling provisions in the Bill, which are highlighted in bold type:

> §8-902 Within 5 days after a rejection, the Board must issue a written statement (the "Statement") of all the reasons and list the number of actions that the Board has reviewed over the previous 3 years, the number of rejections, and the number not acted upon. **This Bill essentially requires Board members drop everything and prepare**

a comprehensive response in five days. **In this regard, we also object to Intro 1120, which requires that the co-op advise whether an application is complete within 10 days of receiving material from a prospective purchaser. This stipulation fails to consider the number of units in the building. Effectively, larger co-ops would be discriminated against and placed at undue burden because of their size. Co-op Board members are unpaid volunteers with family, job, medical, or other personal demands that also require their time and attention.**

§8-902 The Statement must be certified as accurate and complete by an officer of the Corporation under penalty of perjury. **Who would a Board member sign such a statement under penalty of perjury? Why would anyone ever want to serve on a Board if they do sign such a statement and it is subsequently manipulated by unscrupulous lawyers? Why does the Bill lack a provision that the co-op could recover its legal fees and costs if the lawsuit was brought in bad faith or dismissed, a serious omission and a deterrent to unscrupulous lawsuits? Finally, why is this a private right of action and not the job of the Human Rights Commissions?**

§8-904 The penalty for failure to provide the statement are damages of $1,000 - $25,000 based on the nature of the situation and the "resources of the Co-op corporation." **It is deeply concerning that the proposed penalties would be assessed on an unequal basis. Is this not the very definition of discrimination? Has the council considered that there would also have to be an evidentiary examination of the corporation's assets to determine how large the damages would be?**

§8-905 The rejected Purchaser can commence an action in court within 6 months and can receive costs, reasonable attorneys' fees, equitable relief and, if willful, punitive damages. **What if the Co-op wins the suit and it is determined that the purchaser provided wrong information on the application or hid improper behavior from the purchaser's past? How much vexatious litigation should Co-Op shareholders have to fund and how long will the D&O underwriters offer insurance at reasonable rates once this Bill is passed? Does the City Counsel not realize that this cost would have to be passed on to all shareholders, regardless of their ability or inability to pay?**

§8-906 No evidence can be submitted to the court that was not contained in the Statement. **This means that if the purchaser lied and the Board learns about it during discovery, it cannot be introduced in evidence. Does this strike anyone as unfair? Is this not a violation of Due Process? Is this an equitable outcome that the City Council desires? Is it intended to be prejudicial in its design?**

We emphasize that there have been no hearings or evidence regarding discriminatory practice by any Co-Op Board in at least the last decade. In rental housing, the landlord is responsible for the cost of operating the building. In a condominium, there is no building mortgage, and every unit owner pays their own real estate taxes. In a co-op, we rely on other shareholders to pay their maintenance and assessments or we must subsidize them. Co-Op Board members are also responsible for providing shareholders with a quiet environment. However, this Bill fails to protect Co-Op Boards who must deal

with uncooperative shareholders. Has the Council ever considered the plight of co-op residents who must live under these circumstances? Or how difficult it can be for Co-Op Boards who are responsible for making certain the bills are paid and everyone behaves civilly? The only way Co-Op Boards have of protecting ourselves, our residents, and our environment is through the ability to reject potential purchasers who are unable to pay their bills, who have been financially irresponsible in the past, or who display antisocial or illegal behavior. Would you be willing to host irresponsible and divisive residents in your own home, co-op, or condo on your dime and on their timeline. What if this resident was effectively forced upon you?

This flawed Bill will make it impossible for Co-Op Boards to make realistic fiscal projections for current or future shareholders. It will increase the financial debt incurred by new mandates and Local Laws that the Council continues to adopt. As another example, Intro 438 requires that co-ops provide purchasers with information on any "planned" capital improvements. What is the definition of a "planned capital improvement." Ideas come before Boards all the time. This term is so broad that the Board could be sued over anything. In our one-hundred-year-old building, we are constantly monitoring for water leaks and are proactive in identifying leaks before they become a major risk. However, at some point we recognize that a major plumbing renovation may be required. Should we have a blanket disclosure that says anything in a one-hundred-year-old building could break at any time and require a major capital improvement? How far ahead in the future would we have to project for "capital improvements", many of which address an unanticipated yet urgent finding? When does common sense prevail? How much litigation will co-op shareholders have to pay before the courts determine what is meant by "planned?"

In summary, this "Bill" addresses a nonexistent problem, places undue burden on voluntary co-op board members, and raises financial costs for New York City residents who reside in co-operatively owned housing, which we estimate at approximately one million residents. Our Co-Op is a wonderful mix of ethnically, politically, religiously, and socially diverse young and old residents, singles and families, immigrants and natives, employed and retirees from a variety of occupations. Passage of this Bill would cause many of our current residents to consider whether they should or could remain a member. It would also cause any insightful future prospective resident to question why they should join a co-op. Finally, it would cause one to ponder the wisdom of serving as a **voluntary** co-op board member if it placed the co-op board or board member at personal financial and legal risk. Not because of violating the trust of the co-op shareholders or overtly violating laws, but because unscrupulous and litigious "prospective residents" and their lawyers go phishing for technicalities on which to pursue legal "gold-paved roads", paved with the stolen funds of honest, hardworking, and morally sound co-op residents.

Given the nature and extent of our concerns regarding the **onerous and unjustified provisions and penalties for Co-Op Boards and their Members** in Fair Residential Cooperative Disclosure Law (the "Bill"), we ask that you please **vote against** Intro 407, Intro 438 and Intro 1120.

Sincerely,

Christine and Joseph Garcia

[redacted]

NY, NY 10024

My name is Kathleen McCarthy. I live in Manhattan in City Council District 3. I strongly **endorse Councilmember Bottcher's legislation to legalize modern shared housing**. We need to expand real, affordable housing options for single New Yorkers.

We have de facto shared housing wherein New Yorkers split family-sized apartments with multiple roommates. This often displaces families and creates unsafe housing conditions. By legalizing and properly regulating shared housing, we can increase supply, improve safety, provide tenant protections, and offer dignified alternatives to shelter.

There is no downside to this legislation. It builds on The City of Yes, which I also supported.

Thank you for this opportunity.

I am writing in support of Int 1475-2025 on the matter of Shared Housing.

New York City is in the midst of a historic 1% vacancy rate. 104,000 people sleep in New York City shelters nightly, with homeless families making up 70% of this population and including 35,000 children. Data points aside, the concrete nature of the crisis - and this is a humanitarian one - reflects itself in the choices that our fellow New Yorkers make between food and rent.

While we may not be able to wholly build our way out of the housing crisis, it is paramount that we consider bold ways to unlock desperately needed housing. I am firmly in support of Int 1475-2025, which creates housing supply - and makes housing more affordable - through the managed legalization of smaller housing units with shared kitchens and bathrooms. To properly discuss the proposal, SRO's first need to be freed from the negative, residual, and hyperbolic connotations of blight, crime, and overcrowding long associated with them when bills preventing their construction were passed in the 1950's. Seventy years later, it goes without saying that New York City is facing much starker affordability challenges.

SROs contribute to mitigating the housing and the homelessness crisis on multiple fronts. A crucial point for consideration is that homelessness does not mean joblessness, as current estimates illustrate that 45% of single homeless adults and 38% of homeless adults in families hold jobs. The creation of more of the SRO housing typology will allow for a critical tier between a market-rate studio apartment and the shelter system to mitigate the numbers of working adults presently in shelter.

SROs will allow a variety of living arrangements to flourish beyond the nuclear family type. Recent data pointed to an increase in single-person households over the last several years, with the number of people living together who are not a family having increased at higher rates. This context, exacerbated by the housing shortage, has led to more people joining together to rent larger homes, which effectively takes family-sized units out of circulation, dramatically curtailing housing options for families and adding additional pressure on family finances.

The passing of this Bill will benefit conversion projects - either hotel-to-residence or office-to-residence - as a well-considered reduction of habitable space parameters can directly increase housing unit supply from within the building envelope. This has a direct impact on the viability of a conversion project, as the number of units that can be accommodated is currently subject to highly restrictive – and constrictive – spatial parameters set by City and

State codes that regulate minimum Living Room square footage and dimensions.

As the housing crisis is no longer abstract, I submit this testimony as an Architect in support of - and advocacy for - this measure and others like it. We desperately need bold, safe, thoughtful, and creative solutions to our housing crisis, as the livelihood of our fellow New Yorkers depends on it.

Keith Engel, AIA

TESTIMONY OF Ken Young
Before the New York City Council
Committee on Housing and Buildings
In Support of New York City's Shared Housing Roadmap, and SROs in particular
Dec 2, 2025

Thank you for the opportunity to present this testimony.
I moved to New York City more than 20 years ago and plan to stay the rest of my life. I care deeply for the city, so when I see the acute housing shortage we have, and I see the cost of living driving people away, and I see so many other people living on our streets, I deeply feel the disservice we're doing to ourselves and our fellow New Yorkers by not expanding housing. Part of that is reforming regulations to encourage new construction, and part of that is making use of current building stock to house more people, both with office to residential conversions, and especially with SROs.

I myself have lived in small spaces in New York. Early in my time in New York, I found roommates. Later I chose to live in very small apartments. Having an option to live in an SRO would have been a great benefit to me at various points. Certainly they're not for everyone at all stages in their life, but certainly, too, they can—and I believe must—constitute a portion of our housing stock in order to quickly expand our city and keep it more vibrant and alive.

Thank you for proposing this legislation,

Ken Young

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Intro 407
Date: Friday, November 28, 2025 12:59:53 PM

From: Kent Hiteshew [redacted]
Sent: Friday, November 28, 2025 12:46 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Intro 407

[redacted]

The Honorable Adrienne Adams

Speaker of the NYC Council

City Hall New York, NY 10007

Re: Testimony in Opposition to Intro 407 (“The Reasons Bill”)

Dear Speaker Adams:

As a member of the Board of Directors of my co-op building, I write in strong opposition to Intro 407-2024, known as the “Reasons Bill,” which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application. Cooperative housing is one of New York City’s most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of New Yorkers. Co-ops are governed by volunteer board members —neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings’ financial and physical health. While we appreciate the Council’s intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws. Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.

- Create a roadmap for litigation by requiring written “reasons” for denials

within 5 days, inviting frivolous and costly lawsuits.

• Drive up D&O insurance premiums, further straining the affordability of co-op living.

• Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.

• Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

Furthermore, Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations. I urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community driven homeownership.

Very truly yours,

Kent Hiteshew

Member of the Board of Directors

45 East 72nd Street

New York, NY 10021

I am writing in support of the city's proposal to allow shared housing.

New York City is in desperate need of more housing, and I welcome shared housing in the city. With rental costs so high and so many homeless people, shared housing can help when done correctly and should be allowed. This type of housing is a good option in such an expensive city like ours for young adults, single professionals, seniors, newcomers to our city, and people transitioning out of homelessness.

I have lived in Chelsea for over 20 years and currently own my apartment in Chelsea. Please allow shared housing to help our city thrive.

Thank you,
Kristy Lopez-Bernal

From: Larissa Gonzalez
To: Testimony
Subject: [EXTERNAL] Shared housing comments
Date: Tuesday, December 2, 2025 8:35:48 PM

[redacted]

Hi New York City Council,

I'm so glad you did this. Very sorry that I wasn't able to attend and also realizing that this testimony is entirely too late for today's meeting, but I would still appreciate it registered with the other emailed comments.

I think that this is a completely amazing idea. In fact when I read the proposal, I was indeed slightly nonplussed that it wasn't already part of NYC's for housing development. Reason being that I attend a program that uses exactly this model very successfully starting from different types of shelters varying from those for families, such as for women and children, subject to domestic violence, people transitioning from homelessness back into employment status and eventually to permanent living situations. From there, there are supportive housing buildings that they operate in conjunction with I assume New York City, but definitely Medicaid and Medicare, in which individuals are paired, have a room, and share the kitchen and bathroom. Finally, there are more independent apartment buildings in into which the most successfully reintegrated people can eventually move into which I do not believe have any sort of regulations as to the comings and goings of the tenancy.

Since I've attended this program, I have remained in awe with the scope and beauty of this aspect of the program. Since I have joined its community, I have forged many new social relationships with people whose lives are distinctly changing for the good as a function of this very model.

So, with the caveat that this would be followed exactly to a T, I would support it enthusiastically.

Larissa Lowe Gonzalez,
[redacted]
Sent from my iPhone

From: Larry Fay [redacted]
Sent: Wednesday, November 26, 2025 4:20 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Request to Oppose Int. 0407/2024, 0438/2024, and 1120/2024

[redacted]

Dear Speaker Adams,

I am a shareholder and board member at a pre-war cooperative building on the Upper West Side, and I'm writing to share my concerns about the three co-op Bills scheduled for the December 2nd Council hearing: **Int. 0407/2024, 0438/2024, and 1120/2024.**

While these Bills may be well-intentioned, they would place **significant new administrative and legal burdens on volunteer-run co-op boards citywide**, despite **no evidence of systemic discrimination** among co-ops. Most co-ops are governed by neighbors volunteering their time, not professional landlords with in-house counsel and full-time administrative staff.

Among other things, these Bills would:

- Impose strict timelines on application review, with **automatic approvals** if deadlines are missed
- Require rejections to be certified **under penalty of perjury**, with detailed historical tracking
- Mandate disclosure of "planned" capital improvements, including early-stage or unapproved ideas
- Increase exposure to litigation and likely **raise D&O insurance costs**

For responsible, well-governed co-ops like ours, these requirements would make it harder to attract shareholders to serve on boards and to focus on the many existing mandates we already must comply with (Local Laws, capital planning, energy upgrades, etc.).

I respectfully urge you, as Speaker, to **oppose Int. 0407/2024, 0438/2024, and 1120/2024**, or at minimum to ensure that any legislation that moves forward is substantially revised so that it does not unintentionally harm stable, volunteer-governed cooperative housing across New York City.

Thank you very much for your consideration and for your leadership on behalf of New Yorkers.

Sincerely,

Lawrence Fay

[redacted]

NY, NY 10025

Shareholder & Board Member

Opposition to Int. 0407/2024, 0438/2024, and 1120/2024 Due to Unintended Impacts on Volunteer-Run Co-ops

Submitted to the New York City Council – Housing & Buildings Committee

December 2, 2025

Testimony of: Lawrence Fay

Shareholder & Board Member, 265 Owners Corp, 265 Riverside Dr, Manhattan, NY 10025

Chair Sanchez, Members of the Committee, and Council Staff:

Thank you for the opportunity to submit testimony on Int. 0407/2024, 0438/2024, and 1120/2024. I am a longtime shareholder and board member of a 75-unit pre-war cooperative building in Manhattan. Our building—like most co-ops in New York City—is governed entirely by unpaid volunteers who donate significant time to keep their homes and communities running responsibly and safely.

I recognize the intent behind these Bills. However, each of them, as currently written, would impose **professional-level administrative and legal obligations** on volunteer boards that simply do not have full-time staff, in-house counsel, or the infrastructure these mandates assume.

Key Concerns

- **Strict Deadlines and Automatic Approvals:**

  Int. 1120 would automatically deem applications "complete" if volunteer boards cannot review them within 10 days—an unrealistic timeline for boards with no staff.

- **Perjury and Litigation Exposure:**

  Int. 0407 requires written rejection explanations certified under **penalty of perjury**, along with a three-year record of all applications and rejections. This significantly increases legal risk and D&O insurance costs, even for well-governed buildings.

- **Disclosure of Unapproved Capital Plans:**

  Int. 0438 mandates disclosure of all "planned" or "anticipated" capital improvements, including early-stage discussions. This could expose co-ops to legal disputes over preliminary conversations and undermine responsible long-term planning.

Lack of Evidence of Systemic Discrimination

To date, **no evidence** has been presented to show widespread discrimination by co-ops that would justify these strict measures. Responsible co-ops already follow fair practices while remaining deeply engaged with their communities.

Impact on Volunteer Governance

These Bills risk discouraging shareholders from serving on boards at all. Volunteer governance is the foundation of cooperative housing in NYC. Burdensome mandates—designed as if co-ops were staffed like professional landlords—could weaken that foundation and shift resources away from critical needs such as Local Law compliance, building maintenance, and capital planning.

Request

For these reasons, I respectfully urge the Council to **oppose Int. 0407, 0438, and 1120**, or substantially revise them to ensure they do not unintentionally harm stable, volunteer-led cooperative housing across New York City.

Thank you for your time and for your service to the people of New York.

Lawrence Fay

265 Riverside Drive, Apt 11D

NY, NY 10025

beijinglarry@gmail.com

503-860-5010

From:	[redacted] Speaker Adams
To:	Testimony
Subject:	FW: [EXTERNAL] Opposition to Intro 407 "The Reasons Bill"
Date:	Monday, December 1, 2025 4:12:14 PM

From: [redacted]
Sent: Monday, December 1, 2025 4:10 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Opposition to Intro 407 "The Reasons Bill"

[redacted]

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 (“The Reasons Bill”)

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the “Reasons Bill,” which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City’s most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings’ financial and physical health.

While we appreciate the Council’s intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written “reasons” for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every

decision carries potential legal and financial risk.

- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Lisa Conroy and Bruce Sales

From: [redacted] on behalf of Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")
Date: Tuesday, November 18, 2025 6:48:38 PM

From: lisa marroni [redacted]
Sent: Tuesday, November 18, 2025 6:47 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

[redacted]

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

I own an apartment at [redacted] Sutton Place South. I was the President of the Co Op for several years and write in opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While I appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.
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Very truly yours,

Lisa Marroni

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

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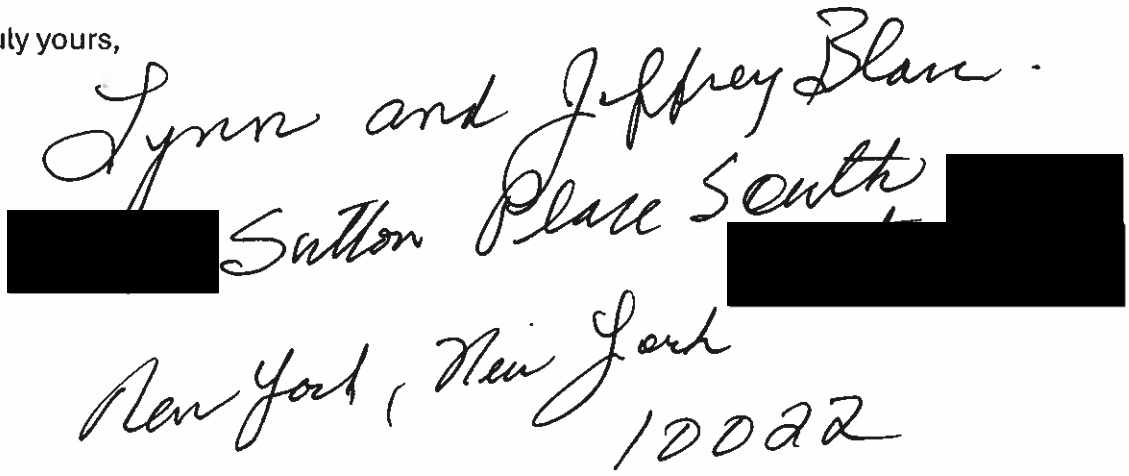
Very truly yours,



From: marguerite pitts
To: Testimony
Subject: [EXTERNAL] Shared Housing
Date: Monday, December 1, 2025 3:33:05 PM

[redacted]

I support Erik Bottcher's plan for Modern Shared Housing. We need all the tools we can muster to province more affordable housing. I believe
this is one way to increase housing opportunity and create a sense of community.

Marguerite Pitts, [redacted] Central Park West, NY, NY

Int. 438-2024 (Sanchez) – financial disclosure for co-op purchasers

I know more about my co-op's financial and capital plans than anyone else, and I would not be able to comply with the requirements of **Int. 438-2024 (Sanchez)**.

Historical information such as annual audited financials: I would be happy to disclose these. We provide all shareholders our audited Annual Financials as soon as they are finalized, typically 3-4 months after year end. I believe disclosure is more appropriate via the shareholder/seller of a coop – but if would be straightforward to comply if I had to.

Accurate current information, including current reserve fund, can be quite difficult and time consuming to pin down. Especially during a major project, it can vary quite a lot depending on what change orders have been approved or proposed, what invoices have been submitted and paid, by which vendors and subcontractors, and untangling that information can take time that I don't have. So this would be problematic.

Future plans: there is no way I can accurately disclose these, even with days of work integrating the hundreds of files, emails, texts on my computer. Rather than try, I would resign from the coop Board I have served on for 30 years and am now the president of. I would be crazy to subject myself to the possible liability.

Example: Rand, our Engineering Consultant, told us our façade project would cost $900,000. It ended up costing over $4 million. I have thousands of files on my computer, thousands of emails, many Excel sheets documenting the increase – but in the middle of the project, neither I nor anyone else could have given an accurate forecast of the eventual costs.

Int. 438-2024 (Sanchez) would increase our accounting, legal, and insurance (directors & officer's insurance) costs, increase the burden on our managing agent and on our Board members, make the already difficult task of recruiting Board members even harder while providing little useful information.

The Department of Buildings sites give comprehensive, easily accessible information about all NYC buildings. Buyers would find that a more useful source than anything I or our managing agent could produce.

Thank you for your consideration, and thank you, Councilwoman Sanchez, for a thoughtful, respectful, well run hearing. Most impressive. I appreciate it.

Martha Greenough

Board President, 258 Riverside Drive Corporation

From: New York City Council
To: Testimony
Subject: [EXTERNAL] Tue, Dec 02 2025 @ 10:00 AM - Committee on Housing and Buildings
Date: Thursday, December 4, 2025 11:57:15 AM
Attachments: Opposing-Int.-407-2024-Public-Advocate-Williams-and-Int.-1120-A-2024-Farias.docx

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[redacted]

Attendee will be: Submitting written testimony
[redacted]
Attendee name (Zoom name): Martha Greenough
[redacted]
Hearing: Tue, Dec 02 2025 @ 10:00 AM - Committee on Housing and Buildings
Subject of testimony: Opposing Int. 407-2024 (Public Advocate Williams) and Int. 1120-A-2024 (Farias)
Organization: Self
Organization if "Other":

If a testimony was uploaded, it will be in the attachments.

Opposing **Int. 407-2024 (Public Advocate Williams) and Int. 1120-A-2024 (Farias)**

Int 407-2024 would increase our costs, directly and indirectly. We would incur additional costs directly, especially legal, insurance, and managing agent fees.

The liability imposed would also make it more difficult to recruit and retain board members. Indirectly, this would mean we would have to pay our managing agent or other contractors to take on tasks now performed by board members.

It is already very difficult to persuade residents to serve on our board. I have served for 30 years, and am now our Board President. I am tired, but I have felt a responsibility to our community. If this bill and Int. 438-2024 pass, I would resign rather than take on the additional liability and time commitment these bills would impose on me.

Our building is diverse. Residents include a flight attendant, a composer, a casting director, a lighting designer, a set designer, an actor, a journalist, a travel agent, a social worker, a massage therapist, a Muslim family, two Shabbos observing families, many retirees on fixed incomes. We have several families who purchased their shares at $280 a share when the building went co-op in 1988, and families who paid ten times that amount per share ten to fifteen years ago. Affordability is a huge issue, and we work very hard to minimize maintenance increases, to maintain this diverse community. We reduced our directors and officers insurance coverage by a third as one step to hold our maintenance increase for 2026 to 6%. This bill would force us to go back to our prior coverage levels, which would force further maintenance increases mid-year.

Int 407-2024 would also have the unintended consequence of limiting our flexibility to relax our rules to address specific issues our residents have. The first witness (remote, via video) at the hearing said they would "prove" bias by showing that a co-op had previously allowed a similar situation. This would deter us from allowing exceptions to our rules.

> Example: we do not allow trusts to purchase shares for an apartment. Before Obergefell, a same sex couple asked to buy the shares for their apartment in a trust. We allowed this, because it was the best way to meet a legitimate need, and they have been valued members of our community for twenty years – while we have not allowed others to purchase via trusts.
>
> Example: we typically do not allow sublets. We have allowed exceptions so residents who have needed to relocate for a temporary job assignment or multi-year academic program who would otherwise would have been forced financially to sell their apartments. There are very high transaction costs for co-op sales in New York City – transfer taxes, brokers fees, etc. Our flexibility has allowed these residents to come back to us.

If any proposed purchaser could assert bias if they were not allowed an accommodation we made to address a specific need, we would be less willing to make such accommodations. We also might have to boost our requirements for cash down, income, etc. to ensure any prospective purchaser would be able to pay maintenance over time, over changing circumstances, making our building less affordable to young families.

Matt McClanahan

310 West 106th Street
New York, NY 10025

City Council of New York **December 2, 2025**
Committee on Housing and Buildings
250 Broadway, 8th floor, Hearing room 1
New York, NY 10031

Thank you, Chair Sanchez, and members of the committee for the opportunity to testify. My name is Matt McClanahan and I am a shareholder and the treasurer of 310 Apartment Corp a 77 unit cooperative in the district of the Honorable Shaun Abreu. I have only served our board for 1 ½ years but have lived in my cooperative for 25.

I rise in opposition to Intro 407, which requires co-op boards to provide "each and all" reasons for rejecting an applicant by using an affirmed statement under threat of civil penalties or worse, criminal perjury.

Int. 407 would require co-op boards to provide "each and all" reasons for withholding consent to a sale within five days, with an affirmed statement under penalty of perjury and civil penalties for violations (see § 8-902(b)–(d) as drafted). I support combating discrimination, but this approach is neither proportionate nor effective.

Proportionality and evidence

- The City has not presented co-op–specific evidence of systemic discrimination, nor conducted a co-op–focused baseline (testing, pattern analysis, or retrospective case review). Imposing a universal narrative-denial mandate without that evidence is a disproportionate remedy.

Effectiveness

- Int 407 would use transparency as a tool to deter discrimination, but the bill's disclosures are not designed for enforcement. Narrative reasons without confidential demographic or pattern data won't reveal disparate treatment. Effective enforcement relies on testing and outcome analysis, not prose.

Volunteer governance and cost

- The five-day "each and all reasons" standard, affirmed under penalty of perjury, will force legal review of denial letters, deter volunteer service, and raise costs— especially in small, affordable co-ops like ours. At our last annual meeting, it was already difficult to fill board seats.

Parity

- If transparency is required, it should be applied consistently across housing types or justified by evidence that co-ops are uniquely problematic. The City has not made that showing.

A better path: targeted, data-driven oversight: Please consider an "oppose unless amended" approach that advances fair housing while respecting proportionality:

1. Confidential data pipeline (kept from boards)
    - Applicants may optionally self-identify protected-class information via a neutral intake (e.g., transfer agent portal). Boards never see it.
    - After decisions, the transfer agent reports to NYCCHR: anonymous application ID, building ID/size, outcome (approved/denied/withdrawn), and standardized financial bands (e.g., income, liquid assets, DTI, credit tier), plus optional self-ID. No PII.

2. NYCCHR analytics and transparency
    - NYCCHR analyzes for patterns controlling for financial bands and building characteristics; publishes de-identified, aggregate citywide summaries with minimum cell sizes to protect privacy.

3. Proportionate, targeted interventions
    - If a building is a statistical outlier, NYCCHR can require targeted training, time-limited enhanced reporting, and paired testing or case review. Only repeat outliers or cases with probable cause would face a temporary narrative-denial requirement.

4. Safe harbors and scope
    - Good-faith boards that complete training and comply with reporting receive a safe harbor.
    - Pilot and sunset (three years) with an independent evaluation before any permanent mandate; small-building carve-out and clear timelines.

Affordability context: Our co-op provides relatively affordable, stable homeownership; by maintenance-as-rent benchmarks, a majority of our units meet 2025 AMI affordability levels for two person households. Policies that chill volunteer participation will weaken this part of the housing ecosystem.

My requests

- Please do not sponsor Int. 407 and vote no unless amended to adopt the targeted approach above.
- Request a joint oversight hearing (Housing & Buildings; Civil & Human Rights) and direct NYCCHR to scope and launch a co-op testing and analytics pilot within six months.

Thank you for your service and consideration. I'd be glad to meet with your staff and share building-level data on recruitment, timelines, and expected compliance costs.

Sincerely,

Matt McClanahan
Treasurer, 310 Apartment Corp.

I am here to express my strong opposition to City Council's Intros 407, 438, and 1120. I serve as the Board Secretary of a modest 26-unit co-op on the Upper West Side, where many shareholders—especially seniors on fixed incomes—already struggle to manage rising costs. Insurance premiums have skyrocketed in recent years and now represent our largest expense after the mortgage, forcing increases in maintenance charges which we try to avoid. These bills will only add to that burden and further strain affordability for residents who are not wealthy.

The proposed requirements would expose co-ops and individual board members to increased legal risk, including frivolous lawsuits, and would significantly raise shared legal expenses. The mandated justifications for applicant rejections and the 10-day response requirement impose unreasonable expectations on volunteer board members who already have families, jobs, and other responsibilities. We already act efficiently and responsibly because our community expects it—not because of penalties.

These measures duplicate existing fiduciary obligations, add unnecessary costs, and will ultimately discourage individuals from serving on co-op boards due to the personal legal exposure they create.

I also ask what evidence demonstrates the need for these bills. Is this a widespread problem causing measurable harm? Do you recognize the financial and legal burdens this will place on your own constituents who live in co-ops?

These proposals will make it increasingly unaffordable for co-op residents to remain in their homes. I respectfully urge you not to move forward with these bills.

Thank you for your attention.

Melissa Marks-Shih
[redacted]
New York, NY 10024
[redacted]

December 2, 2025

Dear Council Members,

As a member of The Victoria Co-op located at 7 East 14th Street, NY NY 10003, I am asking you to oppose and vote against Int 407, Int 438 and Int 1120-A. Co-ops and condos citywide provide the first homeownership opportunity for many New Yorkers as well as ***an affordable home for well over a million existing New York homeowners and residents.***

Each of these bills would increase the liability and expenses faced by cooperatives. They would result in the micro-management of the admissions process - which my board uses to ensure the financial health of my building - while providing little to no help to prospective homeowners.

Intro 407 requires board members to provide a detailed list of reasons for withholding consent to a purchase application. The list must cite documents and references provided by the applicant, and must be structured to enable the applicant to work to remedy their application. One board member must agree to attest - under penalty of perjury - that no other board member considered reasons or documents outside the list.

This legislation would impose difficult constraints on cooperatives, and would threaten the volunteer board members who have agreed to serve their building with excessive liability and potentially felonies for carrying out their fiduciary responsibility. The passage of this bill would risk the operational capabilities of cooperative buildings across the city, a cost which would be paid by existing shareholders.

Rather than passing this bill, we urge the Council to work directly with our cooperative community and our housing advocates to find transparency frameworks that could work.

Intro 438 would require boards to release unverified working documents and unaudited or unreviewed financial statements to prospective purchasers who have no legal relationship with, obligation to, or vested interest in the cooperative.
Cash flow statements vary greatly depending on the time they are produced and therefore would not provide relevant insight to a prospective purchaser. It is difficult to provide an accurate estimation of the total costs of either active or planned capital improvement projects. Further, the bill is unclear as to when a project is considered “planned” for purposes of compliance.

Providing the information requested, which may be inaccurate and/or misinterpreted through no fault of the cooperative, could lead to inadvertent non-compliance and excessive liability.

We urge you to vote against this bill and instead allow cooperative boards to continue providing reliable, audited financial statements to prospective purchasers.
Intro 1120-A would impose a one-size-fits-all time frame on the very diverse co-op universe of New York City. It would reduce the effectiveness of co-op admissions and damage best practices. Close examination of application materials in accordance with a board’s fiduciary duty to cooperative members often leads to follow-up questions, which require additional materials or details to substantiate information provided. Boards must be able to request the documents they require right up to the time of consent to ensure that their decisions are in the best interest of the cooperative.

Including a penalty of automated acceptance for failure to meet a timeline is severely damaging to cooperatives and could lead to the acceptance of potentially irresponsible or dangerous individuals, leading to significant financial and quality of life risks for all community members. If a penalty is to be assessed for failure to properly administer an admissions review, it is imperative that said penalty is a fine due to the seller.

Each of these bills would have a chilling effect on cooperative board participation, and would cause increases in operational and insurance costs that would be passed directly to shareholders.

Thank you for your attention to our concerns, which are shared by cooperatives within our district and across the city. We strongly urge you to vote against all three bills and meet with co-op advocates to work on other potential solutions.

Sincerely,

Michael Fabbro
7 E 14th Street, New York NY 10003
[redacted]

Michele Birnbaum
[redacted]
New York, New York 10028
Tel : [redacted]
Fax: (212)427-8250
E-mail: [redacted]

December 2, 2025

New York City Council Hearing on Intros # 35, 1120 and 1120-A
Sales of Cooperative Apartments

Chairs and Council Members:

As a Board member of my cooperative for 35 years, serving in the capacities of President and Secretary, it is with great disappointment that I am having to address these bills, as the fact that they have been brought to the Committee shows me that there is blatant disregard of those people who have invested the most in this city, committed to the support and well-being of their neighborhoods and form the tax base that the city needs to fund the programs that the Mayor and the Council propose.

The Coop and Condo Boards of Directors are made up of dedicated volunteers that maintain the buildings' structure, comply with Local Law 11 and all city building codes, scaffold and sidewalk use, and keep the building compliant with all city and state laws.

It is within their duty and a very important responsibility to be sure that prospective purchasers of a unit meet the financial requirements to assure that they will be able to pay their share of the buildings' maintenance, assessments and capital projects.

To attempt to handicap them and potentially prevent them from performing these duties, is to sabotage the process for reasons not defined.

RE: Intro #438: The time frame of two weeks being proposed for compliance of the release of a building's financials disregards obstacles to this, i.e. summer vacation times, lack of the accountant's availability and scarcity of the Management Company's administrative staff during holiday or vacation times. To inflict the corporation with fines for circumstances beyond their control lacks sense and reason and seems punitive by a body that seems to be seeking to inflict unnecessary harm on those trying to do a good job. Boards will get this information to prospective purchasers as soon as feasible, because it is in the Directors' and the shareholders' best interest to conclude a sale in a timely manner.

RE: Intro #1120: It is equally problematic to implement the process suggested in this Intro, as it does nothing but increase the amount of paperwork necessary to finalize a sale. To demand that a buyer is accepted because paperwork was delayed puts the

Corporation or Association in jeopardy for the entire time that the buyer turned neighbor is in the building, because the automatic acceptance does not ensure that the financial vetting has been concluded and that this person, persons or family will be a good financial neighbor. This back and forth does nothing to effectuate a timely sale but does everything to enrich the attorneys' by increasing the billable hours on both sides.

Requiring the formality of a written document as notice of receipt when a simple follow-up phone call or email suffices, unnecessarily complicates and burdens both parties.

The list of requirements is not burdensome, as most coops and condos have that already, and that's how the prospective buyer knows what information to submit to the coop. The burdens are the timeframes, as Boards have to either copy packets and distribute them to all members, give members,)whose business and private life demands differ), time to read the packets and evaluate them and ask for more information, if needed. In addition, there needs to be time to schedule a meeting between the buyers and members of the Board, which can result in having to coordinate the schedules of upwards of 10 people in some instances.

RE: Intro 1120-A: Seems to be redundant.

While nothing in the bills seem egregious, because they appear to benignly be putting time frames on what is usual good practice, penalizing volunteers for a process that mostly works, but may occasionally fall short, unnecessarily costs money with fines and increased legal fees, and more importantly may result in mistaken acceptance of an applicant leading to a potentially grave financial burden on the cooperative and resentment between residents going forward.

These bills help no one, have unintended consequences and don't substantially serve the greater good.

Please VOTE NO!

Thank you for reading my testimony.

Sincerely,

Michele Birnbaum

Michele Birnbaum
[redacted]
New York, New York 10028
Tel : [redacted]
Fax: (212)427-8250
E-mail: [redacted]

December 3, 2025

December 2, 2025 New York City Council Hearing on Intros # 407 and 407-A Sales of Cooperative Apartments

Chairs and Council Members:

As a Board member of my cooperative for 35 years, serving in the capacities of President and Secretary, it is with great disappointment that I am having to address these bills, as the fact that they have been brought to the Committee shows me that there is blatant disregard of those people who have invested the most in this city, committed to the support and well-being of their neighborhoods and form the tax base that the city needs to fund the programs that the Mayor and the Council propose.

The Coop and Condo Boards of Directors are made up of dedicated volunteers that maintain the buildings' structure, comply with Local Law 11 and all city building codes, scaffold and sidewalk use, and keep the building compliant with all city and state laws.

It is within their duty and a very important responsibility to be sure that prospective purchasers of a unit meet the requirements for residency to assure that they will be able to pay their share of the buildings' maintenance, assessments and capital projects and live harmoniously with their neighbors.

To attempt to handicap the Board and potentially prevent them from performing these duties, is to sabotage the process for reasons not defined.

It is imperative to remember that coops are private corporations. It is up to the Boards and the shareholders to determine the rules of the corporation, not the City Council.

As long as coop Boards respect and follow all city, state and federal discrimination laws, which are already on the books and need no further intervention from the City Council, other rules are not the purview of the Council or any other outside body. Requiring a Board to organize a detailed written statements to an unsuccessful buyer within five days of the final turn-down decision, is disrespectful of the Board's time and availability and overreach of the City Council's jurisdiction.

If a party is rejected by a coop, that party has the right to sue now, and if a suit went forward, all that you are now wanting to require in advance, would be made available on discovery. By requiring information be given to the unsuccessful buyer when no lawsuit is inevitable, you are setting up a climate which might cause a lawsuit to be initiated , thus causing an undue burden on the coop that then incurs legal fees for writing the report and legal fees for answering and defending a claim.

As long as the cooperation is not engaging in discriminatory practices, it has the right to deny a prospective shareholder, and no new discrimination rules can be arbitrarily ascribed to a private corporation's transactions which it is or is not executing in its own best interests.

The courts have recognized that the coop has an interest in evaluating prospective shareholders. Shareholders do not own their own apartments, but instead, own shares in a corporation which has responsibilities that include the common areas. Shareholders have financial responsibilities calculated on the basis of the shares they own. It is in everyone's best interest to have all apartment occupied and no outstanding shares.

Requiring that a coop file a statement of sales or lack of sales with acceptance or denial statistics, is also government overreach. If a coop does not process sales and keep its apartments occupied, the remaining shareholders would have the undue burden of providing the shortfall in the operating and capital budgets. No coop would deem that acceptable. The coop is motivated to sell its apartments.

An effort to intimidate a Director by requiring sworn testimony will make it very difficult to find shareholders willing to serve.

And to what end – are all these legal acrobatics?

Every important protection that you seem to be looking for is already in place with laws that govern them. The rest is legal make-work.

VOTE NO ON INTROS #407 AND 407-A and bury them in the archives of the Council's bad ideas.

Sincerely,

Michele Birnbaum

My name is Miranda DeNovo, I live in Ridgewood, Queens, and I'm a community organizer focusing on disability and homelessness. I'd like to tell you a personal story about living in shared housing and how I became homeless in 2020 as a direct result.

I moved to New York City in 2016 with no family and a serious undiagnosed illness, making just above the poverty line. I lived in all kinds of quasi-legal shared settings, mostly in and around Bushwick, for a while even sharing a bed, with a revolving door of women and queer people in similar financial circumstances. Everyone I knew lived like this—especially working in the book publishing industry, where the salaries were and are notoriously low. The only people I knew who were able to get their own leases were those who lived with their partners—which is not the security it sounds like because if you break up, that means you also lose your housing!

In 2020, I was sharing a two-bedroom apartment on Myrtle/Broadway with two virtual strangers. Officially, they were my subletters, as I had lived there long enough to inherit the lease from a previous tenant when he moved out. But I should stress that under any other circumstances, I would absolutely never have been allowed to qualify for a $2,000/month lease on my $40,000/year salary—and there was no way in hell that I would have been able to pay that $2,000 all on my own.

When the pandemic hit, both my roommates moved home with their families. I had nowhere else to go, so I stayed. Now picture this, I've gone from my rent being $600/month on a $40,000 salary, to $2,000/month on a $40,000 salary. For those of you who are familiar with the concept of "rent burden," you can do the math here: All of a sudden my rent was a whopping 60% of my income.

I applied for the Emergency Rental Assistance Program (ERAP), but because I had not lost my primary income, my application was rejected. By this point I owed more than $10,000 and although the eviction moratorium was still in place, I was terrified that the debt would follow me for the rest of my life. And so I left and availed of the only lifeline I had, which was moving in with a friend and her husband.

That was stable until it wasn't, when I got in a fight with the husband and he kicked me out. A stranger from social media was kind enough to let me stay with her for two months, but then I had to move again. At this point I was exhausted and deeply traumatized.

Those of you who have worked directly in the homelessness sector will likely be familiar with the argument that doubling up with family or friends can be a protection against becoming homeless. But in my experience, it's just another kind of homelessness, one that may keep you out of a shelter but also keeps you in limbo with zero access to services. (And by the way, I'm not just making this claim out of nowhere: The McKinney-

Vento Act also includes “temporarily staying with other people” in its definition of homelessness.)

Five years later, I can just barely afford my own rent-stabilized one-bedroom in Ridgewood, but have been sharing it with a friend for the last 18 months because that friend was denied access to the NYC shelter system due to being “too disabled.” (Yes, this is illegal, and if any of the Councilmembers would like to provide support, please let me know.) My friend is eligible for multiple housing voucher programs but has been unable to obtain any of them due to a variety of issues including the shelter requirement for CityFHEPS, which I believe there’s a separate hearing about tomorrow. And so we continue to be doubled up.

I cannot stress enough that a 350-square-foot apartment is not appropriate housing for two disabled people who both have complex medical needs. But more to the point, it’s not appropriate housing for anyone. We should not be normalizing the idea of a city in which 30- and 40-year-olds cannot afford to rent their own apartments. It’s ridiculous. I’m sick of living like this.

At least when I was sharing apartments with strangers, we were able to work out informal deals among ourselves. By contrast, legalizing SROs will fuel gentrification in neighborhoods like Ridgewood and Bushwick by allowing landlords to charge even higher rents than they already do.

Creating a system of regulations to legitimate overcrowding is not, as supporters are calling it, a “dignified alternative to shelter.” As someone living once again in an overcrowded apartment, I do not feel dignified. I feel abandoned by the city I call home.

We already have alternatives to shelter—namely vouchers such as CityFHEPS, and 2010e supportive housing. These are what the city needs to be investing in. Please vote against today’s proposal to legalize and regulate SROs, and instead focus on implementing the CityFHEPS expansion that was approved in 2023 and has been stalled ever since. Thank you for your time.

Mitchel Levine
11 Riverside Drive Corp
11 Riverside Drive
New York, NY 10023

Testimony Before the New York City Council
Committee on Housing and Buildings
December 2, 2025

Chair Sanchez and members of the committee, thank you for the opportunity to submit testimony on these critical issues.

My name is Mitchel Levine. I am a long-time shareholder, board member, and past treasurer of 11 Riverside Drive Corp., a large housing cooperative on Manhattan's Upper West Side, where I have lived with my wife since 1968. For decades, my priority as a board member has been to safeguard the financial stability of our cooperative and keep carrying charges affordable for all shareholders, especially the most vulnerable.

This work has become increasingly challenging. City legislation has significantly increased operating costs, and when we raise concerns or request stakeholder engagement, we are often told to "sell and move" or that "nothing can be done." As a retired public-school educator who dedicated his career to serving NYC students and volunteering in my community, I find this dismissive approach unacceptable.

The Council is now considering three bills—Intro 407, Intro 438, and Intro 1120-A—that would fundamentally alter cooperative governance without meaningful consultation with boards or advocates.

While transparency is an important goal, these bills will not achieve it in ways that matter. Instead, they will create serious unintended consequences that threaten affordability and stability.

Intro 407

This bill would impose unreasonable liability on volunteer board members, discouraging participation and straining operations. Recruiting qualified board members is already difficult; adding personal legal risk will make it impossible. The bill also undermines boards' ability to fulfill their fiduciary duty. Even one shareholder who fails to pay bills or comply with policies can destabilize an entire building, and eviction is costly and rare.

Requiring boards to detail every deficiency in an application and disclose sources of negative information invites litigation and increases risk. These mandates will drive up legal fees, insurance premiums, and administrative costs that will ultimately fall on shareholders.

Intro 438

While intended to promote transparency, this bill would require disclosure of confidential financial information and speculative projections.
Boards cannot accurately predict future capital costs or cash flow, which vary based on timing and unforeseen changes such as Local Law compliance.

Providing unaudited estimates could mislead buyers and expose boards to liability. Compliance would also increase administrative burdens and costs, further eroding affordability.

Intro 1120 – A

The deadlines in Intro 1120 -A could erode co-op autonomy, allow unqualified buyers through "deemed consent," and create administrative burdens for volunteer boards, especially smaller ones.

Conclusion

Cooperative housing is one of the most accessible paths to homeownership for New Yorkers.

These bills, though well-intentioned, would undermine that model. If enacted, they will not create transparency; they will create instability. They will make it harder for volunteers to serve, harder for cooperatives to remain solvent, and harder for ordinary New Yorkers to afford their homes.

Cooperative housing is the leading affordable housing for most New Yorkers. For many, it is their first home. Your legislation will make cooperative home ownership less affordable and reduce families' opportunities to build equity.

I respectfully urge the Council to reject Intro 407, Intro 438, and Intro 1120-A and instead work collaboratively with cooperative boards and advocates to develop solutions that strengthen—not weaken—this vital housing option.

Thank you for your attention and consideration.

Nancy Idaka Sheran
[redacted]
New York, NY 10016
[redacted]
[redacted]

December 1, 2025

WRITTEN TESTIMONY FOR DECEMBER 2, 2025 PUBLIC HEARING ON MODERN SHARED HOUSING

As we all know, NYC is in an affordable housing crisis! One million residents are rent burdened. There is no silver bullet solution to this crisis. All tools in the toolbox should be used.

Modern Shared Housing legislation is a valid approach, and it should be added to the usable toolbox. NYC has used it successfully in the past with boarding houses, residential hotels and clubs. YMCA residences are a form of shared, dormitory style housing. Students, performing artists, and other people who are in NYC on a temporary basis, working and need a place to call their own, certainly can take advantage of this type of housing. It could also be transitional housing for some, instead of shelters while waiting for permanent housing. Taking heed of the SRO failures, this approach needs to be carefully designed and implemented with oversight.

I strongly support the proposed legislation which would:

- Legalize new SRO-style homes with shared kitchens and bathrooms (no more than 3 units per kitchen/bath)
- Legalize modern shared housing, including suite-style and dorm-style co-housing
- Set strong safety standards, including sprinklers, electrical capacity, and occupancy limits
- Support office-to-residential conversions
- Create regulated, tenant-protected alternatives to unregulated co-living models

As a final comment, shelters are the new SROs—they are dangerous for residents, do not provide decent stable housing. In my opinion, NYC should be phasing out shelters, while replacing them with temporary housing such as shared housing and other housing solutions, until permanent sufficient affordable housing can be found for those who need it. NYC needs massive amounts of affordable housing of all kinds.

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Neil M. McCarthy

[redacted] Sutton Place South, [redacted]

New York, NY 10022

December 1st, 2025

The Honorable Adrienne Adams
New York City Council
City Hall
New York, NY 10007

Re: Opposition to Intro 407, Intro 438, and Intro 1120 ("Co-op Transparency Package")

Dear Speaker Adams,

We are writing on behalf of the Board of 4 Tenants Corporation, a cooperative residence in Carnegie Hill, to express our strong opposition to the so-called "Co-op Transparency" legislative package—Intro 407, Intro 438, and Intro 1120—now under consideration by the Committee on Housing and Buildings.

These bills, though presented as measures to promote fairness in co-op sales, would have serious unintended consequences for the thousands of volunteer-run housing corporations that sustain New York's neighborhoods.

Our Concerns

- Intro 407 would require sworn, detailed written explanations for any rejected application, exposing volunteer board members to personal liability and creating a roadmap for costly litigation.
- Intro 438 would compel the release of sensitive building financial information to prospective purchasers, inviting misinterpretation and jeopardizing confidentiality.
- Intro 1120 would impose rigid review deadlines and "deemed consent" provisions that fail to reflect the realities of volunteer governance, particularly during holiday or summer periods.

Why It Matters

Co-op boards already operate under stringent anti-discrimination laws at the city, state, and federal levels. These proposals would not enhance fairness—they would discourage community participation, drive up insurance and legal costs, and undermine the stability of one of New York's most effective affordable-ownership models.

Our board members are neighbors serving neighbors, devoting countless unpaid hours to managing finances, capital repairs, and quality of life for our residents. These bills would replace trust and discretion with bureaucracy and legal exposure, weakening the very governance model that has worked for generations.

Our Request

We respectfully urge you to oppose Intros 407, 438, and 1120 and to encourage the Council to collaborate with co-op boards, management professionals, and civic organizations to achieve meaningful transparency without harming the volunteer foundation of co-op life.

Thank you for your attention and for your continued service to our district and community.

Very truly yours,

Nicholas Letica
President, Board of Directors
4 Tenants Corporation
4 East 95th Street
New York, NY 10128

November 8, 2025

Personal / Agent Perspective

Nilsa Ramirez – Howard Hanna Rand Realty

As a real estate professional, I fully support efforts to bring **greater fairness and transparency to the cooperative purchase process** in New York. Buyers deserve clarity—not confusion—when going through one of the most significant purchases of their lives.

Too often, I see qualified applicants denied without any explanation. This leaves buyers frustrated and uncertain, despite meeting all financial and personal requirements. Establishing a **defined timeline for co-op board responses** and requiring a **clear reason for any denial** are both necessary steps to create accountability and restore trust in the system.

Transparency is not just fair—it's the foundation of a healthy and inclusive housing market for everyone in New York.

From: [redacted] Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Intro 407
Date: Tuesday, December 2, 2025 11:16:39 AM

From: paul horn [redacted]
Sent: Tuesday, December 2, 2025 11:15 AM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>; District14 <District14@council.nyc.gov>
Subject: [EXTERNAL] Intro 407

[redacted]

- The Honorable Adrienne Adams, Speaker
  The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
  New York City Council
  City Hall
  New York, NY 10007
  Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")
  Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:
  We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.
  Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.
  While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.
  Why Intro 407 Is Misguided
  This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.
  Instead of improving fairness, Intro 407 would:
  • Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
  • Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
  • Drive up D&O insurance premiums, further straining the affordability of co-op living.
  • Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
  • Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

- The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

From: Phyllis Bishop
To: Testimony
Subject: [EXTERNAL] Stabilization
Date: Monday, December 1, 2025 7:33:52 PM

[redacted]

Stabilized Housing according to MFJ has no laws or rules on modernization.

I live at the address below with 751 tenants and commercial property users.

Stabilized tenants have not been provided with modernized kitchens. We are not provided with any replacement major appliances like stoves, refrigerators or with updated electrical power to run such. We have no internet ready outlets. The electricity is included in the rent.

Heat and Hot water from 1 electric steam boiler is rationed at will by the building owner. The NYC Heating Season Rules are not complied with. There is no heat or hot water at night.

Calling 311 brings inspectors whose reports never appear on line....mysteriously lost. ist.

I have violations and repairs, mold and lead, cracked sinks, missing water in Faucets, that remain unfixed for 5 years.

We were 221 now we are down to 49, elderly and some disabled.

This is no way to treat seniors who pay their Omnibus Electricity included charge and then cannot run their air conditioners except on Energy Saver and is a NYC disgrace.

HPD took this case of my apartment to Civil Court and it is just sitting there now through 2026 as they notoriously do nothing and wait for one or the other side to cave in and draft a settlement.

Before you build PLEASE
correct the rules on the rights of landlords using out of control power over the heads of stabilized rent paying tenants, who pay them for provided shelter and nothing else.

Phyllis M.G. Bishop
[redacted]
The Park Royal
[redacted] West 73rd Street
[redacted]
New York, NY 10023-3104

Testimony of Rachel Miller-Bradshaw
[redacted]
Bronx, NY 10468
[redacted]
[redacted]

To:

Housing Chair Pierina Ana Sanchez (District 14)
Public Advocate Jumaane D. Williams
Majority Leader Amanda Farias
All Members of the New York City Council

Written Testimony Submitted for Public Hearing

I submit this testimony with deep concern regarding another series of legislative proposals that, intentionally or not, place new burdens on New York City homeowners and specifically on cooperative housing communities.

As an African American woman who grew up in impoverished Harlem in the 1980s in a single-parent household, I am profoundly proud to have worked, pursued my education, saved responsibly, and become a homeowner. My one-bedroom cooperative unit in the Bronx represents both personal achievement and the broader importance of homeownership opportunities for working families. In New York City, African American and Hispanic residents make up approximately 44% of homeowners, including 88% in Co-Op City and a significant share at Fordham Hill Owners Corporation.

Concerns Regarding the Legislative Approach

I question why the Public Advocate and many on the Council continue to advance bills that appear adversarial toward New Yorkers who have chosen to invest and remain in this city. New York City has lost an estimated 1.5 to 2 million residents over the last decade. Policies that destabilize cooperative housing—one of the strongest affordable homeownership models—risk accelerating that trend.

Understanding Cooperative Housing

Cooperative housing is not comprised of wealthy elites seeking exclusion. Its foundation is built on equity, equality, self-help, democracy, and solidarity.

The cooperative model began in New York City in 1857 and has since provided generations of working families with stable, affordable housing. A cooperative is a group of shareholders who collectively manage and maintain their property. Shareholders commit to fiscal responsibility, community engagement, and preserving long-term property value.

To remain financially sound—particularly amid rising insurance premiums, property taxes, compliance requirements, and capital projects—cooperative boards must retain the ability to evaluate prospective purchasers responsibly and ensure they can sustain the financial obligations of homeownership.

Board members are volunteers who receive no compensation for what a second job is effectively. Many work full-time, care for families, and volunteer because they are committed to protecting the community's financial stability and safety.

Comments on Intro 407

The premise of Intro 407 addresses an issue that is statistically minimal. Instances of board rejections are rare and typically grounded in financial qualifications. As a former Fordham Hill Board member with eight years of experience, I can attest that ensuring a buyer is financially capable is essential to avoiding significant arrears—often exceeding one million dollars—which ultimately fall on the remaining shareholders.

New York State's eviction process is lengthy and costly, even in cases of severe nonpayment. This bill would require volunteer board members and already overstretched managing agents to provide detailed written reasoning to prospective purchasers, imposing risks, administrative burdens, and potential penalties on communities already facing rising operational costs.

Comments on Intro 438

Intro 438 is impractical and exposes cooperatives to significant liability. Prospective buyers are not shareholders until they close, and many withdraw before closing. Requiring boards to provide confidential or incomplete documents—such as unaudited financials while they are still in progress—would violate standard governance practices and potentially jeopardize the cooperative's fiscal management.

Comments on Intro 1120-A

This bill imposes unrealistic timelines on volunteer boards and managing agents. The majority of delays in the application process stem from brokers submitting incomplete packages—not from board review. Smaller and self-managed cooperatives would be disproportionately burdened by a rigid 10-day requirement to determine completeness.

Cooperatives want sales to proceed efficiently; maintenance revenue is vital for operations. However, due diligence cannot be rushed without risking poor financial outcomes for the entire community.

Conclusion

Collectively, these bills send the message that New York City does not value its homeowners or the cooperative housing model, which has provided affordable, stable living for generations. Homeowners should not be treated as obstacles but as partners in maintaining vibrant, sustainable communities.

I urge the City Council to reconsider these measures and halt policies that weaken cooperatives and penalize the very residents who invest in and remain committed to New York City.

Respectfully submitted,
Rachel Miller-Bradshaw

Subject: Testimony Opposing Intros 407, 438, and 1120-A

Testimony of Rachel Miller-Bradshaw

[redacted] Bronx, NY 10468

[redacted]

To:

Housing Chair Pierina Ana Sanchez (District 14)

Public Advocate Jumaane D. Williams

Majority Leader Amanda Farias

All Members of the New York City Council

Two-Minute Public Hearing Testimony

My name is Rachel Miller-Bradshaw, and I am an African American homeowner in the Bronx. I grew up in impoverished Harlem in the 1980s in a single-mother household on food stamps. Through education, hard work, and saving, I became a first-time homeowner. For eight years, I served as Vice President, Secretary, and a Board Member of my cooperative, Fordham Hill Owners Corporation.

I am deeply concerned that these bills—Intros 407, 438, and 1120-A—unfairly target homeowners and threaten the stability of cooperative housing, one of the strongest affordable homeownership paths for working families. In NYC, Black and Hispanic residents make up roughly 44% of homeowners, including many in mid-income coops like Co-Op City and Fordham Hill.

Cooperatives are built on values of democracy, equity, and community. They rely on volunteer boards—people like me—who receive no compensation yet carry the responsibility of protecting financial solvency, quality of life, and safety.

Intro 407 attempts to solve a problem that barely exists. Rejections are rare, and when they occur, they are almost always due to financial risk. When buyers cannot afford their units, arrears can reach millions, leaving remaining shareholders to absorb rising insurance, taxes, and compliance costs.

Intro 438 would force cooperatives to release confidential or incomplete documents, including unaudited financials, to individuals who are not yet shareholders and may never close. This creates unnecessary liability and undermines proper governance.

Intro 1120-A imposes unrealistic timelines on volunteer boards and managing agents. Most delays come from incomplete applications—not board review. Smaller and self-managed coops will be disproportionately harmed.

Collectively, these bills send the message that the City Council does not value homeowners who invest in and remain committed to New York City. Cooperative housing is not the problem—it is an affordable, community-driven model that keeps working families here.

I urge the Council to reconsider these bills and stop policies that weaken the cooperative housing system that has served New Yorkers for generations.

Respectfully,

Rachel Miller-Bradshaw

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
Council Member Keith Powers
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

- This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.

- Drive up D&O insurance premiums, further straining the affordability of co-op living.

- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

E. Raman Bet-Mansour

[redacted] East 72 Street, [redacted]
New Yor, NY 10021

From: Rebeca Taub
To: Testimony
Subject: [EXTERNAL] Shared housing
Date: Monday, December 1, 2025 5:24:36 PM

[redacted]

I have lived in lower Manhattan for over 30 years and in Brooklyn 15 years before that. The homelessness problem has gotten significantly worse since the SRO hotels were banned. Please passed Eric Bottcher's bill to help remedy this awful problem. My Midwestern relatives are horrified when they visit.
Rebecca Taub.
Sent from my iPhone

December 1, 2025

Subject: Please Oppose Int. 407, 438, and 1120A

Dear Council Member:

I am a shareholder of 61 West 9 Tenants Corp., a/k/a “The Windsor Arms,” a cooperative housing corporation located at 61 West 9th Street, Manhattan. I’m writing to express my opposition to Int. 407, Int. 438, and Int. 1120A, and I urge you to vote against these bills in their current form.

These bills would place heavy and unnecessary burdens on cooperatives, including intrusive disclosure requirements of unaudited financial information to non-shareholders, arbitrary and strict timelines that volunteer boards cannot always meet, and potential penalties that would deter many individuals from volunteering to serve on cooperative boards. In fact, these requirements would prove difficult—if not impossible—for volunteer board members to meet without risking serious personal liability.

These bills will cause unintended harm and irreparably damage the cooperative housing model, which currently provides hundreds of thousands of New Yorkers with access to safe and affordable housing. They risk disrupting stable coop operations without meaningfully improving transparency. I respectfully urge you to vote against these bills in their current form and to work with cooperatives and residents to develop more balanced solutions.

Thank you for your consideration.

Sincerely,

Richard Feiner

[redacted]
New York, NY 10011
[redacted]

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

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The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

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A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Robert Elder

From: [redacted] Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Opposition to Intro 407 ("The Reasons Bill")
Date: Monday, December 1, 2025 2:49:48 PM

-----Original Message-----
From: Rochelle Busch [redacted]
Sent: Monday, December 1, 2025 2:49 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>
Subject: [EXTERNAL] Opposition to Intro 407 ("The Reasons Bill")

[redacted]

Dear Speaker Adams, Chair Sanchez and Members of the New York City Council:

As a longtime owner of a large apartment in a wonderful Co-op building, [redacted] Sutton Place South, NYC 10022 [redacted], I am aware there will be a meeting to vote on the above Bill tomorrow morning, December 2, and since I can't attend in person, I wanted to be sure to register my STRONG Opposition to this Bill.

It will negatively effect Coop Boards in many ways and seems to indicate that co-op boards act with bias and discrimination while they actually act in the best interests of the tenants that they represent in making sure an applicant can pay the monthly maintenance costs involved and any building assessments that may arise and have good personal letters of recommendation to be a suitable addition to their building's community. This is why my husband and I chose to purchase a co-op apartment and not a condo. Much better security and a feeling of community when you return home. In a very busy city, that peace of mind is very, very important.

This Bill, if passed, will expose Board volunteers to personal liability for performing their fiduciary duties in good faith, will drive up D&O insurance premiums (further driving up the huge costs of co-op living), discourage volunteer participation by shareholders to serve on boards…absolutely essential for a well-run building. Etc. etc.

I personally cannot understand why the Council would want to make our living in NYC and really supporting the City with our insanely high annual Real Estate Tax, even more difficult.
Many tenants have changed their legal residence to other states to avoid paying these unreal taxes—why our monthly maintenance fees are so high. Now you are trying to force more city residents to leave with this unfair bill. A huge Mistake.

Thank you.

Rochelle Busch

December 1, 2025

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Ana Sanchez, Chair
Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Int 407, Int 438, and Int 1120-A

Dear Speaker Adams, Chair Sanchez and Members of the City Council:

My name is Rosalie Genevro, and I am a shareholder and former co-op board member at 390 Riverside Drive in Manhattan. I submit this testimony in opposition to Int 407, Int 438, and Int 1120-A.

These bills will increase costs, expose buildings to lawsuits and undermine the cooperative model. As a homeowner, I am concerned about the long-term financial and operational stability of my co-op and urge you to oppose these bills.

Respectfully,

Rosalie Genevro

From: [redacted] Speaker Adams
To: Testimony
Subject: FW: [EXTERNAL] Letter in Opposition to Intro 407-2024
Date: Tuesday, December 2, 2025 3:55:12 AM

From: Sheryl Michels [redacted]
Sent: Monday, December 1, 2025 11:26 PM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>; District14 <District14@council.nyc.gov>; District18 <District18@council.nyc.gov>; District5 <District5@council.nyc.gov>; gethelp@advocate.nyc.gov
Subject: [EXTERNAL] Letter in Opposition to Intro 407-2024

[redacted]

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

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A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Sincerely,

Sheryl D. Michels, Secretary

201 E. 62nd Street Corp

Holland & Knight

787 Seventh Avenue | New York, NY 10019 | T 212.513.3200 | F 212.385.9010
Holland & Knight LLP | www.hklaw.com

Stuart M. Saft
+1 212-513-3308
Stuart.Saft@hklaw.com

Testimony of Stuart M. Saft

Before The New York City Council Housing and Buildings Committee
on Intro 407, 438 and 1120

December 2, 2025

Dear Council Members:

My name is Stuart Saft and I am a lifelong resident of the City of New York, born in Brooklyn, raised in Queens, and presently residing in Manhattan. I am also Chairman of the Council of New York Cooperatives and Condominiums, an attorney representing the elected boards of approximately one hundred cooperative housing corporations throughout the City of New York, a former chairman of the Board of Directors of the National Cooperative Bank, and the President of the Board of a Manhattan Co-Op.

In 1983 I was rejected by a co-op Board obviously because of my weak finances and six months later I bought another co-op in a less prestigious building where I have served as Board President for 35 of the last 41 years and we have twice been awarded by the Landmarks Preservation Commission for our restoration of a hundred-year-old building. There is life after a rejection and I am proof of it. I overreached and the Board was not going to give me a pass. They could not because the Board has a fiduciary duty to the shareholders to make certain that the maintenance gets paid and the shareholders' quiet enjoyment is protected. Unlike a condominium in a co-op the non-defaulting shareholders have to pay the maintenance of the shareholders who default; although the same is true in a condo but in a condo there is no mortgage on the building and everyone pays their own real estate taxes and real estate taxes and mortgage debt service are two huge financial obligations. The other is the fact that if a shareholder defaults, they have to be evicted because they are tenants and that can take 3 or more years and it makes no difference that they are also shareholders.

The Mayor Elect has been discussing the affordability crisis in New York City and that also applies to co-ops and this Legislation will make co-ops less affordable and prevent talented shareholders from wanting to serve on the Board. Moreover, our co-ops are naturally occurring retirement communities and we need to operate our buildings, comply with all the Local Laws from the City Council and unfunded mandates from New York State and keep our maintenance affordable to protect our neighbors who are on fixed income. These three bills containing words like "perjury" and punitive damages are an affront to every hard working co-op owner in New York City.

I also have been actively involved in cooperative housing in New York City for more than 40 years and have dealt with co-op problems throughout the City including the debt restructuring for Co-Op City to keep it solvent, find funds to rebuild it, preventing Kings Village and Clinton Hill in Brooklyn and Hyde Park Gardens, Boulevard Gardens and Hampton Court in Queens and many others from being forced into bankruptcy and dissolution. During the real estate recession of the 90s, I served on the Manhattan Borough President's Affordable Housing Task Force, the Queens Borough President's Co-Op Task Force and three New York State Attorney General's Task Forces on the Martin Act.

Moreover, I have also spent decades protecting the ability of co-op boards to manage their real estate and preserve the quality of life for more than five hundred thousand New Yorkers who live in co-op buildings.

I am here today to testify against Intro 407, 438 and 1120, each of which will make the operation of co-ops in New York City more difficult, expensive and risky for the volunteer boards and will adversely affect the quality of life of the shareholders and will result in fewer qualified people willing to serve on co-op boards.

Intro 407

I can summarize my testimony in one sentence: Intro 407 helps no one and will have a negative impact on every co-op in New York. Intro 407 would be a disaster for co-ops and their residents, who elect their boards to manage their jointly owned property and pay all the bills because it will impede the board's ability to operate the property.

The most pressing issue the City Council could tackle to improve the lives of the hundreds of thousands of co-op owners in New York is to make co-ops more affordable, but Intro 407 will make co-ops more expensive.

As I am certain you realize, co-op housing is different than rental housing or condominiums because only in a co-op is each shareholder responsible for all the real estate taxes, insurance, the building's mortgage, repairs, maintenance, replacements and all the local laws you enact. If one or more shareholders cease making their maintenance payments and assessments, there is no landlord to pay them, and unlike a condominium where each unit owner pays their own real estate taxes and mortgage. Co-op boards have to be certain that a purchaser will make their payments. In addition, if a shareholder fails to do so or creates havoc in the building, the board has to commence an eviction proceeding in Landlord-Tenant Court. There is no expedited procedure to remove a nonpaying or troublesome shareholder. Moreover, if the purchaser becomes unruly, the other shareholders look to the board to solve the problem.

In reading Intro 407, I am shocked that the sponsors of the Bill believe it to be reasonable to require their constituents to "swear under perjury" that no one had an underlying motive to reject a buyer. How does anyone know what anyone else is thinking at any time? Is it reasonable to subject board members to punitive damages? Why does the City Council hold co-op boards in such low esteem when they are just volunteers trying to help their neighbors at the same time as they are also dealing with jobs, family, and the difficulty of being a New York City homeowner.

The most shocking part of this situation is that the city, state and federal Human Rights Commissions already have the power and authority to deal with discrimination. Why is it necessary to also make board members targets of litigation by a cottage industry of lawyers that will bring litigation just for the chance that they will be able to convince a jury that someone did not behave properly.

Meanwhile the New York City Human Rights Commission has not reported any cases they have brought against co-op boards in the last few decades for any inappropriate behavior.

What is the public policy basis for this law and the expense it will impose on innocent shareholders throughout New York City?

Intro 438

Intro 438 would require co-op boards to deliver to prospective purchasers disclosure of capital improvements that are "planned" and the cost of the improvements without a definition of the word "planned." At what point is a

capital improvement planned? This sloppy drafting means that the Corporation can be sued if they have preliminary discussions and no decision has been made or money expended.

Intro 1120

Intro 1120 would provide that within 10 days of receiving materials from a prospective purchaser the Board must indicate whether the application is complete. The problem is that each Board member would be required to review the application and its supporting documentation to make that determination. Moreover, large co-ops may get multiple applications at the same time. Board members have jobs, family responsibilities, and have to deal with an endless supply of local laws and state mandates and cannot drop everything else to review applications. What about buildings with 200-1,000 apartments? Should they have the same standards as a 20-unit building? This is just not fair to the Board members.

I must note that in 1990 the New York Court of Appeals in the landmark decision of Levandusky v. One Fifth Avenue Apartment Corp. held that:

> As courts and commentators have noted, the cooperative or condominium association is a quasi-government—"a little democratic sub society of necessity." The proprietary lessees or condominium owners consent to be governed, in certain respects, by the decisions of a board. Like a municipal government, such governing boards are responsible for running the day-to-day affairs of the cooperative and to that end, often have broad powers in areas that range from financial decision making to promulgating regulations regarding pets and parking spaces....
>
> Through the exercise of this authority, to which would-be apartment owners must generally acquiesce, a governing board may significantly restrict the bundle of rights a property owner normally enjoys. Moreover, as with any authority to govern, the broad powers of a cooperative board hold potential for abuse through arbitrary and malicious decision making, favoritism, discrimination and the like.

> On the other hand, agreement to submit to the decision-making authority of a cooperative board is voluntary in a sense that submission to government authority is not; there is always the freedom not to purchase the apartment. The stability offered by community control, through a board, has its own economic and social benefits, and purchase of a cooperative apartment represents a voluntary choice to cede certain of the privileges of single ownership to a governing body, often made up of fellow tenants who volunteer their time, without compensation. The board, in return, takes on the burden of managing the property for the benefit of the proprietary lessees.

I must also point out that the very same people who elect the co-op's Board of Directors also vote to elect the members of the City Council, the Mayor, the Public Advocate and every other position of government and yet, time and again the City Council is considering Bills restricting the ability of the citizens of the City of New York from electing boards to govern their homes. If the shareholders are unhappy with the boards, the boards can be replaced just as City Council members can be. Why is it necessary to place the boards at risk?

Today's three Bills are solving a problem that does not exist and will cause shareholders to refuse to run for the board, will make D&O Insurance more expensive and will only award a cottage industry of lawyers who have no compunction to bring meritless litigation in the hope of scoring a big pay day. The fact that punitive damages and penalties of perjury are included in the Bill is shocking. My fellow Board members and I are volunteers who have jobs, families and other responsibilities. We do not need to risk jail or huge fines for oversight. We do not understand why this is necessary when there are city, state and federal Human Rights Commissions that are charged with dealing with these issues. Moreover, there have been no complaints against Board members in decades.

Board members are not paid and now will have a target on their backs. That is their award for attempting to be a good neighbor.

Finally, there is also an important factual inadequacy in the Fiscal Impact Statement that indicates that there is zero impact on the City's Revenue in FY27 and that ignores the revenue that the City receives form Transfer Taxes, which will diminish as the value of the co-op apartments go down because boards will be afraid to turn anyone down for any reason. Who are you trying to protect?

From: [redacted] of Speaker Adams
To: Testimony
Subject: FW: The Reason Bill
Date: Tuesday, December 2, 2025 3:55:00 AM

From: Susan Olden [redacted]
Sent: Tuesday, December 2, 2025 1:31 AM
To: Speaker Adams <SpeakerAdams@council.nyc.gov>; district@council.nyc.gov
Subject: [EXTERNAL] The Reason Bill

[redacted]

Dear Speaker Adams and Chairwoman Pierina Sanchez,

I strongly oppose the 407-2024, Reason Bill. There are laws in place I understand that are vigorously enforced on all levels of government.
It is not prudent or fair to pass a bill with such ambiguity. Passing this bill, that could so easily be manipulated with a lack of the broader view of the population-who does it effect and is it fair. Do you know what the end game will look like? Think about it.

A board consists of a group of people with different views who must vote on all issues including, if this is the real issue, discrimination. It is safer and far more democratic with a board than one individual selling a condo. It appears that level playing field is a thing of the past. It does not sound very democratic to me. This bill leaves to many dangling participles which could jeopardize co-ops.

I was on the board of my building and to find qualified volunteers, who want to serve, is an arduous task due to the breath of knowledge one needs to sit at the table plus integrity, pragmatism, unbiased etc. The boards would dry up with this bill. Then where will we be.

My experience on the board, focused on the financials because unlike a condo every tenant is responsible for all the expenses of the entire building. Refusing a prospective tenant because the financials are not strong enough leaves a building vulnerable to a lawsuit which is so popular now. It is the duty of the board to protect the building from just this situation. It takes months if not years to terminate a tenant in default.

Many shareholders, especially the elderly who have lived in a building for 40 or 50 years, find it difficult to make ends meet with the ever-increasing costs of maintaining and upgrading building 100 plus years old and constant increases in maintenance.

I hope this bill does not pass. We have enough turmoil in our lives to add yet another ill-conceived Bill/Law.

Thank you for your time and attention.

Respectfully,
Susan OLden

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

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A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours, Susan Petscher

As a contented resident of my co-op for over forty years, I agree with every sentence in this opposition to Bill 407-2024. There's an old saying "if it ain't broke, don't fix it".

TESTIMONY IN OPPOSITION TO INTRO 407, INTRO 438, AND INTRO 1120-A

Submitted by: Tania I. Arias

I. INTRODUCTION

Thank you for the opportunity to provide testimony in opposition to the above-referenced proposals.

My name is Tania I. Arias, and I currently serve as Chairman of the Tudor City Presidents Council, President of the Board of Prospect Owners Corp. (45 Tudor City Place), former President of the Board of 99 Avenue B, and a Licensed Associate Real Estate Broker in New York State for over 30 years.

While these measures may be well-intentioned, they exemplify the law of unintended consequences—creating outcomes that undermine their own goals. Rather than enhancing fairness or affordability, they would increase costs, reduce flexibility, and ultimately make life in New York City even less affordable. I will outline my opposition to each proposal in turn.

II. INTRO 407

The unintended negative effects of Intro 407 are significant. If enacted, it would not only reduce affordability but also create new obstacles in the co-op approval process.

Currently, only 3–5% of co-op applications are rejected, according to industry data. The vast majority of denials stem from an applicant's financial inability to meet ownership obligations. These determinations occur before an interview and are based solely on objective financial standards—such as debt-to-income ratios and liquidity—established by the corporation under the Business Corporation Law (BCL).

Boards of Directors have a fiduciary duty to ensure that each shareholder can reliably meet their financial obligations. When shareholders default on maintenance payments, it threatens the financial health of the entire corporation, increases legal costs, and can prevent both the building and future buyers from obtaining financing. Lenders routinely avoid buildings with high arrears.

Applications that fail to meet these established financial benchmarks are denied prior to interview—based on quantifiable data, not personal opinion or subjective judgment.

Importantly, boards often exercise flexibility and discretion in reviewing applications. A slightly higher debt-to-income ratio may be offset by strong credit, employment stability, or escrowed maintenance. Conversely, an applicant with adequate income but a poor credit or

work history may be denied. Most co-ops avoid rigid written standards precisely to preserve this discretion and allow case-by-case consideration.

Intro 407 would destroy this flexibility by mandating that boards provide a certified written statement detailing the exact reason for any rejection. This ill-conceived requirement would expose volunteer board members to heightened legal risk and discourage service. To protect themselves, corporations would be forced to codify strict, inflexible financial thresholds—such as fixed credit score or income minimums—within their bylaws.

This rigidity would eliminate any ability to work collaboratively with applicants and, ironically, make co-op ownership less accessible.

It is also worth noting that nearly all purchasers are represented by real estate professionals whose goal is a successful transaction. As a broker with over three decades of experience, I can attest that virtually no professional knowingly submits an unqualified application. Board denials are rare.

Ultimately, co-op boards act with fiduciary diligence to protect the collective interests of all shareholders. Given the low rate of rejections, the sweeping and punitive nature of Intro 407 is wholly unjustified.

III. INTRO 438

Purchasers' attorneys already perform extensive due diligence prior to contract signing, including review of public materials such as board minutes, audited financial statements, budgets, offering plans, and bylaws.

Intro 438 would compel boards to disclose unaudited financial statements, unfinished project documents, and other non-final records that are subject to change. This would expose corporations—and by extension, their shareholders—to increased legal liability and administrative costs.

These added expenses would ultimately be borne by shareholders, driving up operating costs and maintenance fees. In a city where 68% of residents live in apartments and only 30% own their homes, any legislation that increases operating costs directly undermines housing affordability.

Once again, this measure reflects the law of unintended consequences: an attempt to promote transparency that, in practice, adds cost, complexity, and risk for both boards and owners.

IV. INTRO 1120-A

Co-op board members are volunteers—residents who dedicate significant personal time and effort to serving their communities. Having served as a board president for multiple buildings, I can personally attest to the commitment and diligence these roles demand.

The review of purchase applications is a careful and serious process that often requires follow-up from managing agents or additional information from applicants. Establishing a rigid timeline for board decisions, as proposed in Intro 1120-A, is unrealistic and counterproductive.

While encouraging timely review is reasonable, enforcing a hard deadline—particularly one that could result in automatic approval if missed—is reckless and dangerous. Co-op buildings vary widely in size, governance structure, and internal processes. A one-size-fits-all mandate disregards these realities and threatens the integrity of the review process.

V. CONCLUSION

New York is facing a crisis of affordability—in both housing and overall cost of living. Our leaders should be focused on reducing burdens to homeownership, not creating new ones.

Intros 407, 438, and 1120-A would do nothing to increase affordability or access to housing. Instead, they would add bureaucracy, raise costs, and expose volunteer boards and shareholders to unnecessary legal and financial risk.

In short, these proposals represent precisely what they claim to prevent: unintended consequences that make New York City less affordable and less functional for those who live and invest here.

For these reasons, I respectfully urge that these measures not be enacted.

Dear NYC City Council,

I find myself constrained for time today, so please forgive the informality of this testimony/ document, but I strongly support simplified pathways to the creation of (much!) more shared/ co-housing in NYC, and enthusiastically support this bill.

It is one commonsense way to make a dent in the cost of housing for many New Yorkers, and I hope to see the Council pass this legislation.

Warmly,
Tom O'Keefe

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
The Honorable Juumane Williams
The Honorable Eric Bottcher
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 (“The Reasons Bill”)

Dear Speaker Adams, Chair Sanchez, Advocate Williams and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the “Reasons Bill,” which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application. Cooperative housing is one of New York City’s most successful and stable models of

While we appreciate the Council’s intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

This bill wrongly assumes that co-op boards act with bias or discrimination. I serve on the board of a small coop building. All our board members are more than aware that housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws, and we strive to treat all potential residents with the fairness they deserve. As far as I know, the only reason we have ever rejected a buyer is because we were not confident that he/she could afford the purchase.

An apartment in our building is already too expensive. If this bill is enacted, the potential for costly and time-consuming lawsuits will sky-rocket, and I do not think we will be able to convince residents to serve on our board.

I urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Victoria Rosenwald, Board Secretary
[redacted]
NY NY 10003

Testimony of Viren Brahmbhatt

Architect & Urban Designer
Resident of Chelsea, Manhattan

Before the New York City Council
Regarding Intro 948 – Boarders, Roomers, and Lodgers in One- and Two-Family Dwellings
[December 3, 3025]

Chairperson, Council Members, and members of the Committee:

My name is **Viren Brahmbhatt**, and I am an **architect and urban designer** living in **Chelsea**, Manhattan. Thank you for the opportunity to submit testimony on **Intro 948**, a bill that would expand the number of lodgers permitted in one- and two-family homes and eliminate the requirement for owner presence during rental periods.

I support the bill's goal of helping small homeowners who are struggling under rising costs and who depend on supplemental rental income to remain in their homes. Shared housing is a valuable part of New York City's housing landscape, and thoughtful legislation can promote both affordability and stability.

However, based on my professional experience and my lived experience as a resident of Chelsea, I believe the current draft of Intro 948 could unintentionally create serious challenges—particularly in neighborhoods like Chelsea, Hell's Kitchen, and Midtown West, where dense development, aging building stock, and longstanding pressures from illegal short-term rentals intersect.

1. Risks in High-Density, High-Tourism Areas

Neighborhoods in and around CB4—including Chelsea and Hell's Kitchen—have historically faced intense pressure from short-term rental activity. Many operators converted small buildings into de facto hotels until Local Law 18 enforcement began to curb these practices. Relaxing occupancy limits and removing the owner-presence requirement without additional safeguards risks reopening that door.

Areas near Times Square, Penn Station, and the Theater District are especially vulnerable due to constant tourism demand. Any change that facilitates high-turnover lodging can have disproportionate impacts here compared to lower-density parts of the city.

2. Safety Concerns in Older Building Stock

Chelsea and Hell's Kitchen contain numerous pre-war walk-up buildings with:

- limited fire egress,
- narrow stairwells,
- interior rooms without proper secondary exits, and
- aging electrical and mechanical systems.

Allowing up to four unrelated adults in these spaces—particularly without owner supervision—raises legitimate questions about safe evacuation, overcrowding, and emergency access. As an architect and urban designer, I am especially sensitive to how incremental occupancy changes can have major implications in buildings not designed for higher-density or transient residential use.

3. Quality-of-Life and Livability Impacts

Many blocks in these neighborhoods already experience:

- late-night noise,
- trash overflow,
- foot traffic from nightlife and entertainment uses, and
- ongoing construction and infrastructure strain.

Increasing the number of renters—especially short-term occupants—can intensify these pressures. Frequent turnover also disrupts residential cohesion and stability, something neighbors feel acutely in high-density environments.

4. Impact on Long-Term Housing Availability

Without clear distinctions between long-term and short-term lodgers, property owners may be incentivized to prioritize shorter stays, which typically generate more income. This could reduce the availability of affordable, stable rooms for individuals seeking permanent housing—undercutting one of the bill's potential benefits.

5. Need for Effective Enforcement Capacity

City enforcement agencies already face high caseloads. Without guardrails, Intro 948 could introduce new categories of housing arrangements that are difficult to monitor and regulate, particularly in areas with a history of illegal conversions and non-compliant conditions.

Recommendations to Improve the Bill

To preserve the benefits of shared housing while minimizing negative outcomes, I respectfully urge the Council to consider the following amendments:

1. Require owner presence for stays under 30 days.

This is the single most effective safeguard against short-term misuse.

2. Establish a simple, mandatory registration system.

A light-touch registry (no inspections required unless complaints arise) would allow the City to track lodgers, ensure accountability, and support enforcement.

3. Tie maximum lodger count to legal bedrooms or square footage.

This aligns the law with building safety standards and avoids overcrowding.

4. Restrict eligibility to primary-residence, owner-occupied homes.

This prevents commercial operators or LLCs from using the law to run unregulated hotel operations.

5. Exclude buildings with inadequate fire egress or substandard safety features.

Safety must be foundational, especially in older walk-ups and non-sprinklered buildings.

6. Create enhanced rules for high-tourism impact zones.

Neighborhoods like Chelsea and Hell's Kitchen need additional safeguards such as required registration and owner presence for short stays.

7. Require basic written house rules for tenants.

Clear expectations about noise, trash, and safety can reduce conflicts and improve coexistence.

Conclusion

Intro 948 seeks to support small homeowners and expand affordable housing options—goals I fully support. But without additional protections, the bill could unintentionally reintroduce

illegal hotel activity, destabilize residential blocks, jeopardize safety in older buildings, and place new burdens on neighborhoods already under strain.

With the targeted amendments outlined above, the Council can achieve a balanced approach that helps homeowners while protecting the health, safety, and stability of New York's communities.

Thank you for your time and for your commitment to responsible housing policy. I appreciate the opportunity to submit this testimony and am available for any questions or follow-up.

Sincerely,
Viren Brahmbhatt
Architect & Urban Designer
Resident of Chelsea, Manhattan

The Honorable Adrienne Adams, Speaker
The Honorable Pierina Sanchez, Chair, Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Re: Testimony in Opposition to Intro 407 ("The Reasons Bill")

Dear Speaker Adams, Chair Sanchez, and Members of the New York City Council:

We submit this testimony in strong opposition to Intro 407-2024, known as the "Reasons Bill," which would require cooperative housing boards to provide detailed written explanations—under penalty of perjury—for any rejected purchase application.

Cooperative housing is one of New York City's most successful and stable models of homeownership. It provides affordable, well-managed housing to hundreds of thousands of working- and middle-class New Yorkers. Co-ops are governed by volunteer board members—neighbors serving neighbors—who devote countless unpaid hours to maintaining their buildings' financial and physical health.

While we appreciate the Council's intent to promote transparency, Intro 407 is deeply misguided and would cause severe unintended harm to the very communities it seeks to protect.

Why Intro 407 Is Misguided

This bill wrongly assumes that co-op boards act with bias or discrimination. That is both unfounded and unfair. Housing discrimination is already illegal and vigorously enforceable under existing city, state, and federal laws.

Instead of improving fairness, Intro 407 would:

- Expose volunteer board members to personal liability for performing their fiduciary duties in good faith.
- Create a roadmap for litigation by requiring written "reasons" for denials, inviting frivolous and costly lawsuits.
- Drive up D&O insurance premiums, further straining the affordability of co-op living.
- Discourage volunteer participation, as shareholders will be reluctant to serve on boards when every decision carries potential legal and financial risk.
- Undermine board discretion, a cornerstone of responsible governance that protects the long-term interests of shareholders and residents.

The combined effect would be higher costs, reduced participation, and weakened governance across thousands of co-op buildings throughout the city.

A Broader Warning

Intro 407 does not close a gap in the law—it creates one. It replaces trust and community service with bureaucracy and legal exposure. Rather than enhancing fairness, it would destabilize a proven housing model that has successfully served New Yorkers for generations.

A Call to Appear and Be Heard

We urge the Council to reject Intro 407 and to work with co-op boards, property managers, and housing advocates to develop policies that genuinely support affordable, community-driven homeownership.

Very truly yours,

Virginia Elder

Dear Council Person Sean Abreu — I am writing as a board member of 390 Riverside Drive, a coop building. We are seriously concerned about the implications of three proposals before the Committee on Housing and Buildings that will be considered on Dec. 2. These are Intro 407, 408 and 1120.

These proposals, whose purpose is unclear, place heavy burdens on the volunteer board members which will discourage people from serving on boards. We are a middle sized building, but the burden would be even greater for small coops.

We are very careful in considering the financial information provided us by prospective purchasers, and communicate reasons for rejection clearly. The proposal, especially 407, leaves openings for lawsuits on frivolous grounds. The requirement that the rejection letter include an oath by a board member would increase the cost of building liability insurance and discourage people from joining the board. The proposals also require more paperwork within a limited period of time, placing still more burdens on the boards.

There are many coops in our district, and we hope you will consider these objections and oppose the proposals.

Thank you very much for your consideration.

Wilbur R. Miller

TO: **Council Member Sanchez, Members of the Housing and Buildings Committee**
FROM: **Will Kwan, Board Director, 139 East 33rd Street, New York NY, 10016 (193 units)**
DATE: **December 2, 2025**
RE: **Testimony: Intros 407, 438, 1120-A**

Good morning. Thank you Council Member Sanchez and the Committee for the chance to testify today.

My name is Will Kwan, I have been a co-op board member for the past 28 consecutive years, since 1997 at 139 East 33rd Street between Lexington and Park Avenue, where I first moved in 1995. There are 193 apartments here, predominantly studios and 1 Bedroom apartments, and since the 2000s, some combination of apartments into 2 Bedroom and a limited 3-bedroom apartment as people decided to stay in our community when they have kids.

I live with my wife, and our 2 daughters, who have only known this building as their home, my 89-year old mother, who shares the studio with my mentally challenged older brother. There is a diversity of culture, religious, economic and ethnic backgrounds of people who live in our community. This diversity is united in that we all want an affordable place that we can live, even if the space is tight, as we believe that NYC is a great place to live. Co-ops have provided long-term affordable and sustainable housing for New Yorkers who have downsized when they get older and on more fixed income, or as a starting point to home ownership, as I did when I first started.

I cannot understand why this council is so intent on targeting such an important class of homeowners in this city? We are a not-for-profit corporation that provides affordable housing for many.

What metrics are you using to blanket target all of this residential class of housing that require such actions? I am trying to distinguish Fact from Fiction. Are you working with fictitious use cases and talking about the exception?

FACT: In the 28-years that I have been on my board, serving in different officer roles, I can recall only a single handful of rejections of apartments where there 6-7% turnover or 11-13 units transfer each year. That is around 1.5% or so rejection rate if that.

You may ask, why have I been on the Board for so long?
FACT - given the nature of our community, there have always been a lack of volunteers (yes, this is a volunteer role that requires many hours of personal time in our community), that want to serve in the community.
FACT - this is not just a periodic role and that we only meet monthly, we do spend time regularly to review all issues, especially those involving any sale of apartments given that in a co-op community, sound decision making cannot be rushed. On a sale, every single board member must review. The detriment of Intro 407 is that it WILL lead to higher legal costs as Board members will need to consult with the co-op attorney before a written response is provided.

Intro 438 irresponsibly exposes sensitive financial information to an outside party (prospective purchaser) without any contractual relationship. Further, it shifts the burden of personal responsibility away from the buyer, their attorney, real estate broker onto the seller and cooperative. The stipulated 14-day timeline to the prospective purchaser puts added time to the co-op, their managing agent, which leads to increased costs.

Intro 1120 - Seriously? This is such an overreach into the private affairs of the co-op community, that we are required to consent to a sale of a home within a certain amount of time or that it will be consented to automatically. There is a degree of risk you are introducing to these communities that have weathered the financial crisis given the stringent requirements to live in the co-ops.

Council Members, surely you must know that we are in an affordability crisis with every costs rising. Your actions will directly negatively impact the financial livelihood of the many co-op communities in NYC. We are already facing an increased level of Local Laws that are causing assessments and continued maintenance increases. Real Estate tax burdens have never lightened up on our community.

Ultimately, if these co-op corporations fail financially, there will be a tremendous impact to the overall financial health of this great City.

Do the right thing, get your facts straight and do not base your decisions on fictitious use cases and exceptions.

Thank you for your time.

Will Kwan - 139 East 33rd Street, Apt. 6E, New York, NY 10016 - wk139e33rd@gmail.com

Written Submission of the Anti-Discrimination Center for the Dec. 2, 2025 Hearing of the Committee on Housing & Buildings

Thank you for the invitation to ADC to come to this hearing to share our expertise -- expertise born of decades of experience of fighting housing discrimination and housing segregation. This written submission is addressed to Intro 407-A and is organized as follows:

Introduction

The New York City Human Rights Law has long prohibited housing discrimination, including housing discrimination by co-ops.[1] But the law as it applies to co-ops has not been effective due to the pervasive practice of residential co-operative corporations in New York City of maintaining secrecy and nondisclosure in their co-op admissions processes. That secrecy leaves rejected families without information about the reason or reasons for turndown and with limited ability to assess (either by themselves or with the aid of an attorney) whether the rejection was motivated in whole or in part by an unlawful discriminatory process. Proposed Intro 407-A would require disclosure of reasons for rejection and, in so doing, the legislation would make the existing prohibition of discrimination in housing more effect in the co-op context.

Background

According to the 2023 New York City Housing & Vacancy Survey, there are approximately 450,000 co-op units in New York City, of which approximately 310,000 are owner-occupied.[2] In other words, a housing stock larger than most major cities.

In 2021, *The Real Deal*, a leading New York City real-estate industry publication, "interviewed more than 40 brokers, lawyers, co-op owners and activists, and found a consensus

[1] *See, e.g.,* N.Y.C. Admin. Code § 8-107(5)(a): "It shall be an unlawful discriminatory practice for [anyone] having the right to . . .approve the sale, rental or lease of a housing accommodation . . . or an interest therein, or any agent or employee thereof," to discriminate on the based of protected-class status. The participation of an individual board member in the unlawful discriminatory act is "sufficient to give rise to individual liability." *Fletcher v. Dakota, Inc.*, 99 A.D.2d 43, 47 (1st Dept. 2012).

[2] *See 2023 New York City Housing and Vacancy Survey, Selected Initial Findings*, Table 2, at 7, *available online at https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023%20NYCHVS%20Selected%20Initial%20Findings.pdf*. A portion of the rental units are held by co-op sponsors or other "holders of unsold shares," which means that, when first sold, those sales will not be subject to co-op board approval. Thereafter, those, too, will be subject to co-op board approval. Another portion of rental units are held by individual co-op owners, which means that the next sale, as with owner-occupied co-ops, will also be subject to co-op board approval.

that while boards have evolved, *discrimination persists in many of the city's co-op buildings*, which cling to opaque systems of power and control."[3] The article went on to note that, "The influential co-op lobby has long stymied efforts by advocates and lawmakers to make the process more transparent, *even as Westchester, Suffolk and Nassau counties have adopted such measures*."[4]

In October 2025, the Department of Housing Preservation & Development released "Where We Live NYC 2025," the City's report on barriers to fair-housing choice. It noted that through Where We Live NYC, "New Yorkers described suspicions of discriminatory behavior in the application process for purchasing a co-op, *but the opaque approval process makes it extremely difficult for applicants to prove discrimination*. Discrimination in the co-op application process may be a significant barrier to accessing affordable, and other, homeownership opportunities."[5] HPD adopted Strategy 1.1.1 is to "advocate for greater transparency in [housing sales], *with a focus on co-ops, such that co-op discrimination is easier to identify.*"[6]

It is striking that the City's Human Rights Law, at the forefront of the nation in so many ways, still does not have provisions mandating that co-op boards disclose to rejected purchasers, even after decades of concern about co-op board practices. In *1984*, The New York Times reported on a co-op discrimination case where the judge, as part of the relief given in the case, required a Queens co-op to give reasons in writing for the following two years. "Officials active in the housing discrimination field said it was the first time in the country that a co-op's board of directors

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[3] *See* The Real Deal, *"Not our kind"; How discrimination persist in New York co-ops,* May 21, 2021 (emphasis added), *available online at https://therealdeal.com/magazine/national-may-2021/not-our-kind/.*

[4] *See id.* (emphasis added).

[5] *See Where We Live NYC 2025*, at 54 (emphasis added), *available at* https://wherewelive.cityofnewyork.us/wp-content/uploads/2025/10/WWL-2025-Final-Plan.pdf.

[6] *See id.* (emphasis added).

has been required to give a reason for rejecting a minority applicant. *They said the decision could provide impetus for state legislation requiring all co-op boards to state why they reject applicants*."[7]

In a *1995* article on co-op discrimination, even the executive director of the co-op industry's trade organization admitted, "Absolutely, there are buildings that don't want kids, and there are buildings with clear ethnic preferences and clear racial preferences, and the brokers know where to take people."[8]

In *2007*, the Columbia Law School legal scholar Vivian Berger, summarized many of the reasons supporting a requirement for co-op boards to disclose reasons to rejected applicants:

> First, victims will be alerted to circumstances suggesting bias if the required statement cites only vague or subjective grounds for the action taken, such as "the family does not fit in." The law will also prod co-ops to put their cards on the table up front, thereby reducing the incidence of pretextual (or, at best, unreliable) post hoc rationalizations produced in litigation to defend turndowns. In addition, it will facilitate a more open co-op market. When would-be purchasers know rejection will entitle them to pierce the veil of corporate secrecy, more of them will dare to explore the full universe of co-op buildings, just as fewer board members will dare to engage in discrimination. Equally important, most co-ops would probably attempt to comply with the mandate in good faith, and thus be more apt to recognize, and nip in the bud, conduct based on unlawful bias.[9]

It is not necessarily the case that discrimination in the co-op sector is inevitably more extensive than that in other sectors of the real estate market, but it is the case that the practice of "testing" that fair housing organizations use to help determine whether discrimination is occurring is uniquely unavailable in the co-op context. That is because a co-op board does not become involved

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[7] *See* The New York Times, *Court orders co-op to say why it rejects applicants*, Oct. 21, 1984, *available online at* https://www.nytimes.com/1984/10/21/realestate/court-orders-co-op-to-say-why-it-rejects-applicants.html.

[8] *See* The New York Times, *Getting into co-ops: the money bias*, Oct. 31, 1995, *available online at* https://www.nytimes.com/1995/10/31/nyregion/getting-into-co-ops-the-money-bias.html.

[9] *See* Vivian Berger, *Co-op Board Rejections: Shed light on them*, The National Law Journal, June 25, 2007.

in an application until after the proposed buyer and seller have entered into a contract; the proposed buyer has made a 10 percent down payment; a financial institution has provided a loan commitment to the proposed buyer; an extensive application, including a credit check and personal and business references have been collected; and such other information as a managing agent may seek on behalf of the co-op has been provided. These steps make testing infeasible in ways very different from discrimination that occurs in other rental and sales contexts.

It is not the case that inaction can be explained by public opinion generally, or the opinion of co-op owners specifically. A 2023 survey conducted by Slingshot Strategies included a question on co-op disclosure. Citywide, it was supported by a margin of 68 percent to 15 percent.[10] Similarly large margins in favor were found regardless of borough, race, age, income, union status, ideology, gender, party affiliation, and, notably, regardless of whether the respondent rented or owned.[11]

A generation earlier, the survey firm SRBI polled on the same question of co-op disclosure. That poll was limited to co-op owners, other than co-op board members, in private co-ops in Manhattan south of 96th Street. The co-op owners strongly supported disclosure. The margin was 62.9 percent in favor and 26.5 percent opposed.[12]

At the same time that Proposed Intro 407-A would empower prospective homeowners to assess whether the reasons for turndown were real or pretextual, it explicitly preserves every coop's right to turn applicants down for any legal reason that is available now.

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[10] Data available online at https://coopdisclosure.nyc/poll.

[11] *See id.*

[12] The survey is available online at https://www.antibiaslaw.com/sites/default/files/2006%20Survey%20Report.pdf. *See* page 4. It is notable that developers almost always choose to build condos, not co-ops. In the period from 2007-2022, there were 81,900 condo units constructed. In contrast, there were only 2,281 new co-op units constructed, only 2.7 percent of the combined total. *See Market-rate condos as an affordable housing tool?,* at 2, 3, *available online at https://www.remappingdebate.org/article/market-rate-condos-affordable-housing-tool*.

Section-by-Section Analysis of Intro 407-A

Proposed Section 8-901, the definitions section, would cover all co-ops except for those with fewer than 10 units.

Proposed Section 8-902 sets forth the obligation to provide a mandatory statement. The starting point for understanding the legislation is that, at the moment a prospective purchaser's application is disapproved (most typically by the co-op's board), the reasons are known. There is no difficulty in discerning the reasons immediately and complying with the requirement. What can difficult, by contrast, is coming up with a false or misleading set of reasons for a rejection.

Paragraph (a) of section 8-902 specifies that the statement must be in writing and must contain "each and all" of the reasons for withholding consent. The requirements are elaborated upon in the remaining paragraphs of the section.

Paragraph (b) includes the specificity requirements. The last sentence of the paragraph ("The statement must contain sufficient information to enable a prospective purchaser to take specific steps to remedy and specific deficiencies in that application") is not intended to grant, and shall not be interpreted as granted, any right beyond existing law or practice to "resubmit" an application or to have an application "reconsidered." Instead, it is intended to underline the requirement that maximum specificity, both as a formal matter and as a practical matter, be provided.

By way of illustration only, stating generally that the applicant with turned down because of "financial reasons" or "bad finances" does not meet the specificity requirement. A statement that an applicant's income, or assets, or duration of employment was insufficient does not meet the specificity requirement. If there was not a specific metric that was applied to the asserted deficiency, that must be stated. If there was a specific metric that was used to determine the

existence of a deficiency in the application, even if an *ad hoc* one, that metric must be stated.[13] If there was a standard metric that the cooperative used as a matter of policy, that fact must be stated, too. In all cases, the specifics of the application must be related to the asserted deficiency.

To continue the illustrations, providing the source of negative information does not relieve the obligation to specify what the negative information was.[14] In all cases and for all reasons, the statement must not leave any doubt or ambiguity about what is meant by the reason provided.

Providing the specific reasons – placing the co-op's "cards on the table – performs multiple important functions. First, secrecy is notoriously the environment within which discrimination thrives. Eliminating that secrecy incentivizes participants in the decision-making process to comply with existing anti-discrimination law.

If the reasons do not add up – for example, if they don't comport with the information provided or how other applicants have been treated – the prospective purchaser may have suspicions of discriminatory treatment confirmed, or may begin to consider whether discrimination played a role.

The requirement encourages both brokers and apartment seekers not to limit their searches to buildings or neighborhoods where it is assumed that they might "fit in," understanding that they will have a way to assess whether they have been treated fairly.

And, if a separate fair housing lawsuit is ultimately brought, the plaintiff will not have to face the prospect of reasons for rejection invented well after the fact.

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[13] For example: "We require that an applicant's expenses for maintenance and loan costs (including both the loan for the purchase of the apartment and other existing loans) not exceed more than 30 percent of the applicant's gross monthly income. Here, your household's monthly gross income is $15,000. 30 percent of that is $4,500. Your monthly combined maintenance and loan cost would be $5,500, exceeding the maximum we permit given your income."

[14] For example: "In the course of investigating your application, our contractor, _____, contacted XYZ Management Company, the managing agent of _____, the building you lived in from 2022-23. Mr. Smith of that office stated that management received numerous complaints from your neighbors that your playing of music late at night was disturbing them." If more specific information is available, that information would need to be included.

Finally, there are benefits collateral to the legislation's principal function of enhancing and facilitating the effectiveness of the fair housing provisions of the Human Rights Law. In many cases, prospective purchasers will understand that, based on a particular building's standards, they were properly rejected. In a subset of those cases, they will find out information (such as inaccurate data in a credit report) that can be fixed so that future applications for housing will have a greater opportunity to succeed.

Paragraph (c), requiring a statement of how other applications were treated in the three years prior to the submission of the application in question, does not require any information beyond the total number of applications received, the sub-total for which consent was withheld, and the number where no decision was reached. This information will help a rejected applicant assess how much of an outlier (or not) he or she is in relation to the co-op's recent past practice.

Paragraph (d) specifies the obligations of the officer of the cooperative corporation selected by the co-op to be the certifying officer for the particular application (it does not have to be the same officer for each application). The duties of the certifying officer include being certain to ascertain each and all of the reasons for withholding consent, *including making certain to include each reason that even one person who participated in the decision* had. In other words, references to reasons of the cooperative corporation had for withholding consent include all reasons that each participant had, even if such reason or reasons were not shared by other participants.

Section 8-903 treats amended, supplemental, and untimely statements. Paragraph (a) applies to circumstances where an initial statement has been provided timely. It gives the co-op the opportunity to amend or supplement that initial statement within 10 business days after the decision to reject an applicant.

Paragraph (b) provides the only opportunity for statements including information not timely provided pursuant to section 8-902 or provided as an amendment or supplement to timely statements pursuant to paragraph (a) of section 8-903. Among other limitations, the acceptance of the information in the statement is subject to a strict time limit and to later determinations that the reasons for untimeliness were true and that they provided good cause for the delay. If the reasons for delay are found not to be true, or the reasons for delay are found not to provide good cause, or the time frame for potential consideration of an untimely statement exceeded, then the statement shall not mitigate the statutory or punitive damages available pursuant to sections 8-904 or 8-905, and the information shall be precluded as provided in section 8-906. Note: on page 4, lines 11 and 19, the bill erroneously references to section "8-907"; the correct reference in both locations is to section "8-906."

Section 8-904 sets forth statutory damages for violations and creates a range so that a finder of fact "shall take into account both the scope of non-compliance and the resources of the cooperative corporation. Note that, unlike actions or proceedings alleging unlawful discriminatory practices (where individual participants are liable),[15] statutory damages are specified to only be available against the cooperative corporation, not individuals. The issue of compliance or non-compliance does *not* involve any assessment of the "reasonableness" of any stated basis for rejection, or whether any stated basis comports with "good business practice."

Section 8-905 provides for capped punitive damages in the event of willful non-compliance. Here, again, the damages are limited to the cooperative corporation as opposed to any individuals.

[15] *See Fletcher*, *supra,* at 1, fn.1.

Section 8-906 applies to actions or proceedings alleging unlawful discriminatory practices. Reasons not contained in fully compliant statements are precluded from being introduced by the cooperation corporation and its directors, officers, employees, and agents. Preclusion applies whether non-compliance is a function of substantive inadequacies in a statement or a function of untimeliness. This section is not intended to preclude, and shall not be interpreted to preclude, a plaintiff or complainant from seek discovery on or introducing evidence concerning any reason for withholding consent, whether such reason constitutes direct evidence of discrimination, evidence of pretext, or otherwise.[16]

Section 8-907 makes clear that actions brought pursuant to this chapter 9 are limited to questions of compliance with the timeliness, completeness, and specificity requirements and shall not determine or purport to determine either the genuineness of reasons provided or any question of whether an unlawful discriminatory act has been committed.

Section 8-908 sets out the limited, permissive role of the Commission on Human Rights in connection with this chapter. Note that prospective purchasers and sellers are not given the right to bring a proceeding under this chapter administratively.

Section 8-909 contains two distinct construction provisions. Paragraph (a) is designed to require broad and liberal construction of the disclosure requirements of this chapter. It again reinforces that the obligation of the cooperative corporation is to provide maximum specificity and visibility to the reasons for rejection. To be able to "make certain" that the prospective information learns why consent has been withheld, the cooperative corporation must proceed with maximum

[16] As held in *Bennett v. Health Management Systems, Inc.*, 92 A.D.3d 29 (1st Dept. 2011), a case ratified by the Council by Local Law 35 of 2016, "Once there is some evidence that at least one of the reasons proffered by defendant is false, misleading, or incomplete, a host of determinations properly made only by a jury come into play, such as whether a false explanation constitutes evidence of consciousness of guilt, an attempt to coverup the alleged discriminatory conduct, or an improper discriminatory motive co-existing with other legitimate reasons." *Id.* at 43.

specificity, clarity, and completeness. There is also a command to interpret the provisions of the chapter to "deter attempts to evade or delay compliance." By way of illustration only, the failure to specify a reason of one participant because that reason was not shared by other participants (for example, not shared by a majority of board members) shall be treated as an attempt to evade and as a non-compliant statement. Likewise, the use of a committee or other person or entity to render a recommendation or decision and to then cite generally to a negative recommendation or decision (whether a negative credit report, a negative view of the applicant by a committee of the co-op board, or otherwise), shall be treated as an attempt to evade and as a non-compliant statement. Any scheme or procedure to defeat the temporal requirements of this chapter (whether by delaying the "formalizing" or a decision or otherwise) shall be treated as an attempt to delay compliance and time measured from the time that a decision was effectively made. Where consent is conditioned, that condition is not complied with, and consent is withheld, it is not sufficient for a statement to cite the failure to comply with the condition, the statement must explain why the application was not satisfactory in the absence of the performance of the condition.

Paragraph (b) assures co-ops that any lawful reason for which they may withhold consent today will still be available to them notwithstanding the passage of this legislation (that is, the legislation is not intended to restrict or expand those currently lawful reasons).

Responses to Frequent Fearmongering Statements (FFS)

The history of the effort to end the practice of coop secrecy has been marked at every stage by opponents of the bill reciting false allegations about coop disclosure legislation. That pattern of fearmongering and deceit continues today.

1. "But we already have laws against discrimination; this bill isn't needed." FALSE. Opponents want you to close your eyes to the fact that their industry's policy of secrecy is precisely what renders fair housing laws ineffective in the coop context. Coop housing is the only type of housing where, because of the nature of the application process, fair housing organizations are not able to test for discrimination in sales. And secrecy has a variety of pernicious, interactive effects:

- It is the environment within which those who would discriminate feel emboldened.
- Secrecy means that applicants who have been turned down have no way to assess – or to get a lawyer to assess – whether discrimination has been at play.
- Secrecy means that those few people who file fair housing lawsuits find that they ultimately have to face reasons for rejection that were invented by a discrimination-defense lawyer long after the fact.

As with other areas of discrimination (and, more broadly, other areas of law enforcement) where victims of discrimination are made to feel as though seeking to vindicate their rights is at best a long-shot, most opt not to proceed. Coop secrecy – the bookend to the urban myth that coops "can turn down an applicant for any reason or no reason – suppresses complaints. And coop secrecy is also contrary to the public interest in two other ways.

- Secrecy discourages qualified people from applying in the first place to buildings where they fear they may be seen as not "fitting in." They know they can go through an

arduous application process, be rejected for a flimsy or illegal reason, and remain in the dark as to why.

- Secrecy has spurred brokers not to "waste their time" being fair, and to steer people away from buildings instead. As one broker quoted by The New York Times once memorably said, "We try to take the temperature of the building to find out what kind of people the Board is looking for."

2. "The bill creates individual, personal liability for Board members." Under the City's Human Rights Law, coop board members who participate in discriminatory conduct can be held liable for that conduct – *just like anyone else who participates in discriminatory conduct.*[17] But in terms of the coop disclosure law, there is NO individual liability. That charge is FALSE. Section 8-904 of the legislation specifies that such fines aw may be awarded run to "the cooperative corporation."

3. "But there'll be a flood of (frivolous) litigation." FALSE. Before getting into the specifics, does that alarm sound familiar? Of course it does: it is precisely the hysterical allegation made over the decades by any and every group that doesn't want to be covered by *effective* civil rights laws. In the real world, most everyone is interested in getting on with their lives, not in getting hung up in litigation that may one day yield sharply *capped* damages. Moreover, the fearmongering wants you to ignore what can and cannot be sued about under Intro 407-A:

- The bill *explicitly* disclaims any interoperation that would restrict the current reasons for which a coop may legally turn someone down.

[17] *See* above at p. 2, fn. 1.

- The only litigation that can properly arise under this bill is a claim that disclosure has not been made timely or completely or both. Hint: a coop that sets out its reasons with specificity and does so timely does not face liability under this bill.
- There is simply no cause of action that is given under this bill to someone who just doesn't like a coop's reasons or thinks that the coop's reasons are foolish. *Anybody absurd enough to want to bring such a case (and who could find a lawyer interested in taking on a money-loser, would have his or her case thrown out on a motion to dismiss.*

The claim about a flood of litigation is also undermined by the industry's own position that turndowns are rare as a percentage of all transactions.

In terms of the *fair housing* litigation that might emerge from turndowns where reasons have been given are limited by a number of factors including: (a) the percentage of turndowns where the demographic profile of the rejected purchase is sufficiently different from the demographics of the building to plausibly even suggest the existence of discrimination is relatively small; (b) where a rejected purchaser sees that a stated financial reason in fact lines up with the submitted information and there is no reason to believe that the specified standard was implemented or applied just for that applicant, there is no reason for that rejected purchaser to file a lawsuit.

What those in the industry who wish to preserve the currently pervasive lack of transparency or accountability actually worry about is that the bill *will* help discover discriminatory practices where they exist.

4. "But boards could be exposed to punitive fines." EXAGGERATED. The coop industry believes it is entitled to special treatment (this, as the Council knows, is not just true in relation to the disclosure bill but extends to lobbying for special treatment in relation to other areas, including already-enacted legislation). Intro 407-A is very careful. The basic fine structure is capped under Section 8-904 (the range is from $1,000 to $25,000), and the bill specifically and explicitly provides that "a finder of fact shall take into account both the scope of non-compliance and the resources of the cooperative corporation." So fewer resources and minor non-compliance both push a potential fine away from the headline maximum that the industry shouts about. In addition, punitive damages are limited pursuant to Section 8-905 to cases where non-compliance was *willful.* Willful non-compliance, of course, is at the core of when punitive damages are imposed; here, even willful violators are given a break because the amount of the punitive damages are *also capped* (at no more than twice the underlying fine). Obey the law and there are no fines; don't willfully violate the law and there are no punitive damages.

5. "But the legislation would undermine the 'discretion' and 'fiduciary duty' that boards must exercise." FALSE, however many times the industry repeats this. If a coop has a legal reason to turn someone down now, that basis will remain fully available to the coop after Intro 407-A is enacted. Here's the language in section 8-909(b): "No provision of this chapter shall be construed or interpreted to restrict or expand the reasons for which a cooperative corporation may lawfully withhold consent." Consistent with the industry's sense of privilege and unaccountability, it would like you to believe that "fiduciary duty" is a magic phrase that allows coops to do whatever they want to do. That's not true. New York State's highest court has long ago reaffirmed the fact that board discretion is far from absolute and does not apply to discriminatory conduct: "*Levandusky*

cautions that the broad powers of cooperative governance carry the *potential for abuse when a board singles out a person for harmful treatment or engages in unlawful discrimination*, vendetta, arbitrary decisionmaking or favoritism. We reaffirm that admonition and stress that *those types of abuses are incompatible with good faith and the exercise of honest judgment*."[18] To be clear: a coop board is not and should not be able to cloak its discriminatory conduct in vague assertions of exercising "discretion." That is exactly why coop disclosure is needed.

6. "But coop owners won't agree to serve on Boards anymore and coop governance will be "destabilized" citywide." This charge is either false (in which case it should be discarded along with all the other fearmongering the industry is engaged in, or it's true . . . in which case the need for coop disclosure is made even more apparent.

This is perhaps the most shocking of the industry's claims: "We won't serve unless we are guaranteed that we will have no accountability for our actions." This is the modern-day version of the old Saturday Night Live satiric commercial for the oil industry: "Do what we say and no one gets hurt." If this is an industry that really believes that its structure and stability depend on secrecy and unaccountability, it is an industry that desperately needed to be regulated more.

We know from survey data[19] that the great majority of coop owners do *not* stand behind the pro-secrecy stance of the industry and its hired guns.

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[18] *See 40 West 67th Street v. Pullman*, 100 N.Y.2d 147, 157 (N.Y. 2003) (emphases added).

[19] *See* pages 34-42, below.

We heard this kind of tale of woe from the coop industry before. The industry insisted that the sky would fall if coop sales prices were publicly available like sales data on other real estate transactions. Former Mayor Bloomberg got that law changed, and the sky didn't fall.

And we know more generally that, whenever there has been consumer, labor, civil rights, or environmental change proposed, those committed to the status quo use apocalyptic rhetoric, and, after the legislation passes, life goes on.

Ironically, the horrific prospect (disclosure) has been in place for decades under the Equal Credit Opportunity Act – even for transactions much less significant that the purchase of a home – and, here again, the sky has not fallen.

The coop industry will adapt to Intro 407-A and there will be coop owners (perhaps some new to previously sclerotic, never-changing boards) who don't find the prospect of saying *why* they did *what* they did to be a barrier to service (one notes that other types of housing providers and their brokerage agents – all of whom, unlike coops, are subject to testing – have not abandoned the field.

7. "But the bill would be hard or expensive to comply with." FALSE. It's easy to comply with. The coop industry itself says that turndowns are rare, so few statements will be required of any coop in any year. The coop industry itself says that most turndowns revolve around financial qualifications, so the required statements will be straightforward.[20]

[20] *See* discussion at pages 6-7, above.

And let's get back to basics: A coop board considers an application and turns that application down. The participants know why they have acted – they just voted on the application! The bill just requires the rejected purchaser to be provided with those reasons. The only coops who have anything to worry about are those who intend to keep their specific reasons hidden or vague. The bill is properly designed to foil those who act in bad faith.

8. "But the legislation will increase our insurance costs." FALSE. First, note that the premise of the charge is that insurance companies know that coops are discriminating but have been able to get away with it because of secrecy in the admissions process: without that secrecy, more of that conduct will be discovered and punished. *Were this the case, it demolishes the industry's first point (that the public interest does not require disclosure because we already have laws against discrimination).* Now to address the point directly: the industry misconstrues what insurance companies are apt to do. Those companies – and this is true across a wide range of potential hazards and liabilities – are interested in insureds taking reasonable steps to *prevent* liability. The focus is on having *proper procedures* in place. If insurance companies do that, the public interest is served. Having proper procedures in place is easy to do in the coop disclosure context, and those coops who have already regularized and professionalized the relevant processes (or do so in response to the legislation) present no additional risk to justify an increase. Finally, note that because the legislation continues to allow coops to reject applicants for any of the legal reasons that currently exists, no additional risk is created by having to approve someone not meeting the coop's standards.

9. "But the City doesn't have the authority to pass this law." FALSE. The Court of Appeals allows the City to go beyond the State in protecting civil rights. The operative principle is that the City has concurrent jurisdiction with the state in the realm of its human rights law. The state has not preempted the field.

10. "But the bill would overturn long-standing law." FALSE. State law is NOT designed to promote a "no disclosure" policy, nor to prohibit locally mandated transparency. As such, the City can require disclosure and not become "inconsistent" with state law. The bill is scrupulous in not making any changes – substantive or procedural – in terms of how a coop decides (on its own) how to set standards and otherwise conduct its admissions process.

THE REAL DEAL
REAL ESTATE NEWS

“Not our kind”: How discrimination persists in New York co-ops

Boards continue to reject qualified buyers and get away with it

Stefani Berkin spent much of 2019 visiting apartments with two of her clients, a gay couple in their 30s.

The pair looked at about 50 units, hoping for a two-bedroom Downtown, preferably with private outdoor space. They thought they struck gold with a $6.8 million co-op in Chelsea — until the board turned them down.

“It definitely wasn’t because they didn’t have the financial wherewithal. They could have bought out the entire building,” said Berkin, president of R New York, who said she’d been warned by the listing agent that the seller, also gay, was known to throw loud parties that upset the neighbors.

Berkin’s clients weren’t ready to give up, so they sent a heartfelt letter, offering to pay for the lobby’s $250,000 renovation. The board didn’t budge.

“Did they get turned down because they were gay? Maybe,” she said. “Probably, in my opinion.”

But there was no way to prove it and little recourse.

For decades, federal, state and local fair housing laws have prohibited discrimination based on race, color, national origin, religion, sexual

orientation, family status or disability. But New York City co-ops, which came into vogue more than a century ago, are run by boards that do not need to provide reasons for rejecting buyers. The closed-door system gives the city's more than 6,800 co-op buildings carte blanche to deny even the most financially qualified applicants.

"It is the ultimate exclusionary tool in American housing, institutionalized and legal," wrote Steven Gaines in "The Sky's the Limit," his 2005 chronicle of luxury real estate in New York.

The Real Deal interviewed more than 40 brokers, lawyers, co-op owners and activists, and found a consensus that while boards have evolved, discrimination persists in many of the city's co-op buildings, which cling to opaque systems of power and control.

The influential co-op lobby has long stymied efforts by advocates and lawmakers to make the process more transparent, even as Westchester, Suffolk and Nassau counties have adopted such measures. Opponents argue that these laws amount to government overreach and could unleash a torrent of lawsuits from rejected buyers.

Now, a national reckoning around race and social justice has brought the issue back to the fore, bolstered by a progressive shift in New York politics. That's giving momentum to co-op disclosure bills proposed in the state Senate and Assembly this year.

"The old guard has to be stopped," said Brian Phillips, an agent at Douglas Elliman.

Few boards put financial criteria in writing, Phillips said, giving them license to discriminate. "There has to be accountability," he said. "It cannot be ambiguous any longer."

Designed to exclude

New York City has more co-op buildings than anywhere else in the country.

The first co-op in the city dates back to the late 19th century, when residents banded together to buy apartments in shared housing clubs.

The new form of homeownership promoted the idea of a jointly owned property, giving way to buildings that explicitly banned ethnic minorities. Later, boards placed informal limits on the religious and racial makeup of their neighbors.

“The fact is, co-ops acted with impunity,” said Cathy Taub of Sotheby’s International Realty.

The legal structure of co-ops lets boards wield tremendous power over who can buy into the building, under the guise of ensuring that candidates are financially qualified and will be a “good neighbor.” Co-ops are considered to be businesses, not real property, and they are bound by corporate law that requires them to act in the best interest of shareholders.

> **“The old guard has to be stopped.”**
>
> **BRIAN PHILLIPS, DOUGLAS ELLIMAN**

In 1959, the Anti-Defamation League found that one-third to one-half of the city’s 175 luxury co-ops had no Jewish residents. A decade later, the ADL’s Harold Braverman told New York magazine it was “still very obvious” that limits were being maintained.

It wasn’t just Jews.

In the late 1950s, the singer and civil rights activist Harry Belafonte was turned down for a rental apartment at 300 West End Avenue. He

famously purchased the entire building, turned it into co-ops and encouraged friends to buy in.

At One Sutton Place South, longtime board President Betty Sherrill allowed the designer Bill Blass, who was widely believed to be gay, to purchase a co-op in the building so long as he wrote a letter vowing to "never embarrass" the board, Gaines wrote in his book. In turning away Canadian fashion designer Arnold Scaasi, Sherrill reportedly said, "I don't want to hurt your feelings, but you live with Parker [Ladd], and that's not allowed in the building."

The extent of discrimination today is hard to quantify, but one top broker, speaking on the condition of anonymity, estimated it is a factor in up to 20 percent of board decisions.

"You kind of sniff it out," the broker said, even "with no proof."

As recently as 2008, financier H. Fred Krimendahl II told the Observer that 820 Fifth Avenue had no residents of color, but "if Tiger Woods wanted to live here, we'd be happy to talk to him." The same article quoted a top broker saying, "You wouldn't bring a rap singer into 19 East 72nd — just as you wouldn't take 19 East 72nd into some rap building. They're divergent cultures."

The city's Commission on Human Rights is charged with investigating housing discrimination claims, including those involving co-ops. The commission logged more than 1,340 housing-related complaints between July 2019 and June 2020, according to its annual report. Most had to do with disabilities and source of income; 103 had to do with race.

Agents still swap information on buildings that are notoriously difficult.

Brown Harris Stevens' Miles Chapin said he's been told, "All they want is WASPy old money." Some agents use code words like "NQ," which means "Not Quite," or "NOK," meaning "Not Our Kind."

“The standard [rejection] is, ‘They don’t like the finances,’” Chapin said. “Another euphemism [is], ‘I think this is more of a condo profile than a co-op profile.’”

When buyers don’t take the hint, some boards have been known to stall by repeatedly requesting information or tacking on additional application fees.

Last November, co-op owner Orlando Rymer sued the board at 65 West 87th Street for raising its application fee after learning his prospective buyers were Chinese. According to court documents, the board raised its standard fee sixfold, from $2,367 to $14,330. It then requested more and more information from the buyers, dragging the process out for eight months before turning them down.

Court documents also allege a pattern of anti-Asian sentiment by Rymer’s neighbors, including an incident in which one sprayed a Chinese man visiting his apartment with disinfectant. The board denied the allegations. The case is ongoing.

Gatekeepers

Many brokers contacted for this article said they are morally opposed to discrimination, but declined to speak on the record for fear of losing business.

Whether they’re representing buyers or sellers, brokers are a key conduit between applicants and boards, as are managing agents, who process board applications. Some of the city’s top brokerage firms also have property management arms, and the two businesses often feed off each other.

“The brokerage community has been a participant in this by being apprehensive about who would and wouldn’t get through the board, thus becoming what I’ve always considered inappropriate gatekeepers,” said Frederick Peters, CEO of Warburg Realty.

Years ago, he brought a Black couple to see a co-op. “The selling broker said, ‘Oh, for God’s sake, you had to make my life more complicated by bringing me this?’” Peters recalled. “I said, ‘Actually, if ever there were a slam dunk buyer it would be this. You can’t turn them down.’”

New York agents are bound by fair housing laws, which the Real Estate Board of New York helps enforce by screening listings shared on its syndicated listings feed. In September 2020, the trade organization instituted a fine for agents in violation of those laws; repeated offenders can lose access to the feed altogether. REBNY hasn’t found any violations in the last five months.

But it can be hard to pinpoint violations in an industry that prizes discretion.

Celebrity broker Ryan Serhant said that early in his career he represented a buyer in her 30s who was turned down. Officially, there was no reason. But the listing agent told him, “I think it’s because she’s a single woman and if they approve her, they’re approving her future husband.”

> **“Another euphemism [is], ‘I think this is more of a condo profile than a co-op profile.’”**
>
> **MILES CHAPIN,** BROWN HARRIS STEVENS

Agents say there can also be consequences for those who go against industry norms.

Elliman’s Joanne Douglas had a longstanding relationship with a co-op board in the 1990s that ended after she brought an interracial couple to a listing.

Douglas said the couple were Harvard graduates and financially qualified, but the board stalled — until Habitat magazine published an exposé about a board being successfully sued for discrimination.

“They got accepted a day later,” Douglas said. “I literally never got one single listing after that.”

“An all-out war”

The fact is, rejections by boards are common. In the mid-aughts, the billionaire Len Blavatnik was denied by two buildings — 927 Fifth and the San Remo — before paying a record $77.5 million for New York Jets owner Woody Johnson’s pad at 834 Fifth.

But Blavatnik didn’t fight back. Few spurned buyers do.

Suing a co-op board, particularly for discrimination, is rare. Many buyers fear being blacklisted by other co-ops. Also, discrimination is hard to prove.

“You can infer and you can make assumptions,” said attorney Marc Fitapelli, “but you can’t go to court with assumptions.”

He would know. In 2012, Fitapelli represented Goldwyn Thandrayen, a citizen of Mauritius, who sued the board of 210 East 36th Street for allegedly blocking his cash purchase of a $390,000 co-op. Court documents cite an email from a board member stating that although Thandrayen appeared to have “quite a lot of money,” his “entire financial portfolio is in some tiny little unknown country.”

Fitapelli declined to comment on the suit, which was settled.

Perhaps the highest-profile case was a standoff between financier Alphonse “Buddy” Fletcher Jr. and board members at the Dakota, the legendary West 72nd Street building where John Lennon was shot in 1980.

In 2011, Fletcher, who is Black, sued the Dakota’s board for racial discrimination after it rejected his bid to buy another apartment there for $5.7 million. “That was an all-out war,” recalled Milton Williams, one of Fletcher’s attorneys. The New York Times labeled the suit an

“embarrassing crack in the facade” of one of the city’s most famous addresses.

Friends had urged Fletcher not to fight the board, according to a 2013 profile in Vanity Fair. When he did, his personal financials, including bank statements and Social Security number, were leaked to the public, triggering a rush of stories about his personal life.

“The stress of the Dakota fight would get so extreme that, according to Fletcher, he got shingles,” the article said.

A judge threw out the suit in 2015, saying Fletcher lacked evidence to prove discrimination.

Still, the case had a lasting impact. As part of the case, a panel of judges found that individual board members could be held liable for acts of discrimination.

“Up until that point,” Williams said, “they had no skin in the game.”

One of the few successful cases was won a quarter century ago.

In 1996, an interracial couple, Shannon and Gregory Broome, sued the board of the Beekman Hill House, at 425 East 51st Street, after being turned down for a sublet. During the interview, court documents said, a board member scrawled “black man” on a notepad. A jury awarded the couple $640,000 in damages and found board president Nicholas Biondi personally liable for $124,000.

Biondi had to give up his apartment and moved to Long Island, where he died in 2018. Long after the case, he maintained he was a victim of circumstance. “His is the story of a successful business man, family man, and community leader who nearly lost it all,” he wrote on his blog, PunitiveDamage.com, “just for being a ‘good neighbor.’”

“I will get this done before I die”

Barbara Ford, a Long Island broker and lawyer, has spent two decades trying to bring transparency to co-ops.

In 2009, she was instrumental in getting Suffolk County to pass legislation that requires co-op boards to disclose in writing why they have rejected an application.

Ford works with others in the industry to target villages and small communities across New York, hoping to create a patchwork of policies that will lead to her ultimate goal: a statewide co-op disclosure law.

“It’s taking me decades here,” she said, “but I will get this done before I die.”

One of the big challenges is documenting housing discrimination.

The Fair Housing Justice Center can’t send testers before co-op boards because doing so would require identity checks and submitting Social Security numbers, said Craig Waletzko, the group’s community engagement coordinator.

“I will say,” he said, “whenever we do investigate for it, we tend to find it.”

Despite failing to get previous iterations of the bill through the legislature, its sponsor, Sen. Brian Kavanagh, said he hopes that increased attention on fair housing issues this year will make the difference. New York City Council Member Brad Lander has also proposed a co-op disclosure bill.

“It’s been a long road,” Kavanagh said. “The co-op boards and their representatives have been pretty well organized and really have resisted.”

Those lobbying against proposed changes include the Westchester-based Building & Realty Institute and the Council of New York Cooperatives &

Condominiums, which counts more than 2,300 buildings as members. The CNYC has contracted to spend nearly $100,000 this year on lobbyists at Cozen O'Connor and Whiteman Osterman & Hanna, according to filings with the state's Joint Commission on Public Ethics.

"We feel co-ops have functioned very, very nicely for a very, very long time without this sort of government imposition," said Mary Ann Rothman, the CNYC's executive director.

Critics say they believe the intent of the legislation is good, but that existing fair housing laws are sufficient.

"This legislation is a cure in search of a problem," said John Van Der Tuin, an attorney who represented the Dakota board when Fletcher sued. "There aren't very many instances in which there have been substantiated allegations of discrimination."

According to Building & Realty Institute CEO Tim Foley, the problem with disclosure — and "this notion of a magic letter" — is that "there's no track record, to us, that says that this is guaranteed to help the problem enough to make up for what we know will be increased liability."

Ford, the Long Island lawyer, called that argument a red herring. In the more than 10 years since Suffolk County's transparency measures passed, "There wasn't one [lawsuit]," she said.

REBNY, whose members sit on both sides of the debate, said it agrees co-ops should disclose why applications are not approved. But in a statement, the lobbying group's president, James Whalen, said any legislation should "be crafted in a way that is squarely focused on preventing housing discrimination and does not result in frivolous lawsuits."

Boards also insist some flexibility is needed.

Marc Luxemburg, a real estate attorney and president of the CNYC, recalled how 40 years ago, real estate scion Robert Durst wanted to buy

a co-op in his Upper West Side building. Durst's first wife, Kathleen, had just gone missing.

"Nobody could prove he had anything to do with her disappearance," recalled Luxemburg, who said the board decided not to take a chance. "Years later, it turned out he had a trail of disappearing people."

Durst is currently on trial in Los Angeles for murder.

Demands

Vetting co-op buyers is invasive by design.

Neighbors in these buildings essentially go into business together, so before accepting a buyer, boards typically want to see financial statements and tax returns to make sure they are financially qualified. Most also ask for personal and professional references.

Real estate agents acknowledge that boards have a fiduciary responsibility to shareholders, but say many use their perch to ask probing questions. It is standard to ask buyers not only if they own pets and plan to renovate but also where they went to school and what clubs they belong to, according to *TRD*'s review of several applications. Taub, of Sotheby's, has seen applications that require prospective buyers to list marital status and age.

"They knew what I made, what I had saved, what I had for breakfast," said one top agent who lives in an Upper West Side co-op.

Serhant said boards, which are made up of volunteers, tend to attract those "who enjoy having perceived power" over others. "You see that, it's in the demands," he said.

Over the past decade, the co-op market has not kept pace with condos.

The median sale price for a Manhattan condo in 2020 was $1.7 million, up 52.6 percent from 2011, according to Miller Samuel data. The median co-op price rose only 15.9 percent, to $779,750.

Condos command a premium in part because they are newer and have more amenities. But some say co-ops' archaic policies are a factor.

Young buyers, in particular, are put off by the onerous approval process.

"They don't want to undress financially for the board," said Lisa Larson of Sotheby's.

In Manhattan's luxury market, condos now outsell co-ops four to one, according to Donna Olshan, who tracks high-end contracts in a weekly report.

Olshan said the co-op sector is "deteriorating" for several reasons, not least of which is that people can't buy and sell freely without the "blessing of a handful of people."

Some co-ops also require buyers to have a certain amount of cash on hand, even after the sale has closed.

Berkin, for example, has clients shopping for a $2.5 million co-op. They make $1 million a year, but she said they will probably need financial help from relatives to be approved by most boards. "When these boards ask for 2.5 times the purchase price in post-purchase liquidity, who has that?" she asked.

The system benefits old money, which Black buyers tend not to have because of historic, systemic racism in the labor market, said Dorothy Brown, the author of "The Whiteness of Wealth."

"If you need someone to make $1 million, it will be an overwhelmingly white pool," she said. "Even if you wind up with a Black banker who is making $1 million, the Black banker is more likely to be first-generation. They don't come from $1 million parents."

Some believe co-op boards have dug in their heels even more because of Covid. Strict financial requirements served co-ops well in the wake of the financial crisis because they had well-funded reserves.

Lately, some boards have taken to rejecting offers they deem too low to protect the value of other apartments in the building.

But that can be a double-edged sword: Units that stay on the market longer are likely to sell for less.

In one case, a $1 million co-op on East 57th Street sold at a $60,000 loss months after the board rejected a higher offer from an elderly gay couple.

“I really was in shock,” said the seller, who was pained to be party to the board’s actions. “It was clearly wrong.”

Speaking on the condition of anonymity, the seller said he reported his board to the city’s Commission on Human Rights, which notified him last year that it would investigate.

Others choose not to pursue their grievances. Berkin, the broker whose clients were rejected in Chelsea, said she offered to fight on their behalf. They weren’t interested.

“They didn’t want to sue,” she said. “[The buyers] didn’t feel they had to explain themselves.”

In a system with little transparency, it was another decision made quietly and leaving no trace.

Slingshot Strategies City Poll, May 2-8, 2023, 1,500 registered NYC voters (Margin of error for total results = +/- 2.5 percent)

Question 25: Under current law, a co-op board is allowed to rejected the buyer that the current apartment owner wants to sell to, and doesn't have to tell the rejected buyer why. Would you support changing the law so that co-op boards would still be able to reject a buyer for the same wide range of reasons as now, but would have to provide a written statement of reasons to the rejected buyer?

		AGE						PARTY			
	TOTAL	18-24	25-34	35-44	45-54	55-64	65+	REP	DEM	IND	OTHER
Yes, I would support changing the law	68	62	72	69	64	70	68	61	72	59	60
No, I would not support changing the law	15	19	13	17	19	11	10	19	13	16	33
Not Sure	18	19	15	14	17	19	22	20	16	25	7

		BOROUGH					GENDER	
		BX	BK	M	Q	SI	M	F
Yes, I would support changing the law	68	69	63	73	69	63	67	68
No, I would not support changing the law	15	13	17	13	12	23	15	14
Not Sure	18	18	20	14	19	13	18	17

		RACE					RENT/OWN	
		WHITE	BLACK	HISPANIC	ASIAN	OTHER	RENT	OWN
Yes, I would support changing the law	68	73	68	65	59	68	66	71
No, I would not support changing the law	15	13	16	14	17	14	13	17
Not Sure	18	14	15	22	24	18	21	13

		INCOME				UNION MEMBER		
		<40K	40-80K	80-150K	150K+	PUBLIC	PRIVATE	NO
Yes, I would support changing the law	68	63	67	71	81	71	72	68
No, I would not support changing the law	15	13	16	14	12	15	22	13
Not Sure	18	24	16	15	7	14	6	19

		IDEOLOGY		
		CONS	MOD	LIB
Yes, I would support changing the law	68	69	65	74
No, I would not support changing the law	15	19	16	10
Not Sure	18	12	19	15

Report on survey of co-op owners not themselves members of a co-op's Board of Directors

April 2006

Report prepared by, and survey designed in consultation with:

Professor Andrew A. Beveridge
Chair, Department of Sociology, Queens College
Professor of Sociology, Queens College and
CUNY Graduate School and University Center

Survey conducted by:

Schulman, Ronca and Bucavalas, Inc. (SRBI)

Survey commissioned by:

Anti-Discrimination Center of Metro New York

Introduction

Elements of the co-op industry have vigorously opposed pending City Council legislation that would require co-ops, when they reject an applicant, to provide that applicant with a specific statement of reasons for the rejection. The bill, "Intro 119," explicitly disclaims any change to a co-op's current right to turn people down for any legal reason.[1] Opposition has been framed in apocalyptic terms: one industry representative has said, for example, that the bill "is an attempt to destroy the very fabric of co-op life."[2]

What do co-op owners who are not themselves members of co-op Boards think? If there were one place in New York City where it was conventionally thought that opposition would be strongest, it was in private co-ops in Manhattan, and particularly in those co-ops located at 96th Street and below, in other words, the heart of co-op country.

To gather the information, the Anti-Discrimination Center commissioned the independent opinion survey firm Schulman, Ronca and Bucavalas, Inc. (SRBI). SRBI, which conducts polling for Time Magazine among others, is a full-service global strategy and research organization specializing in public policy and opinion surveys, banking and finance, telecommunications, media, energy, transportation, insurance and health care. Clients include major financial institutions, Fortune 500 companies, federal, state and local governments, foundations and universities.

As shown on page 4 of this report, it turned out that **a co-op disclosure bill was supported by qualifying respondents by a margin of more than two-to-one: 62.9% believed there should be a co-op disclosure law; only 26.5% answered "no."**

Shareholder attitudes to their Boards are detailed at page 5 of this report.

---

[1] *See* proposed Admin. Code § 8-1109(b).

[2] "If a Co-op Kills a Sale, Should It Say Why," *New York Times,* Real Estate Section, March 19, 2006.

Procedure

The survey sought the opinions of those adults in private Manhattan co-op buildings at or below the south side of 96th Street who owned their buildings and who were not themselves members of their co-op Boards. Building data was first gathered by a respected published source of data on Manhattan co-op's: Yale Robbins' "2006 Co-op/Condo Directory of Manhattan." The buildings listed in the published source were divided into three strata by size (100 units and less, 101-200 units, and more than 200 units). The three strata were equivalent in size in terms of the aggregate number of units in each.

Buildings representing equivalent number of units per stratum were then randomly selected. An independent provider of telephone number data was provided with the randomly selected buildings, and, in turn, provided a maximum of 12 telephone numbers per building for dialing.

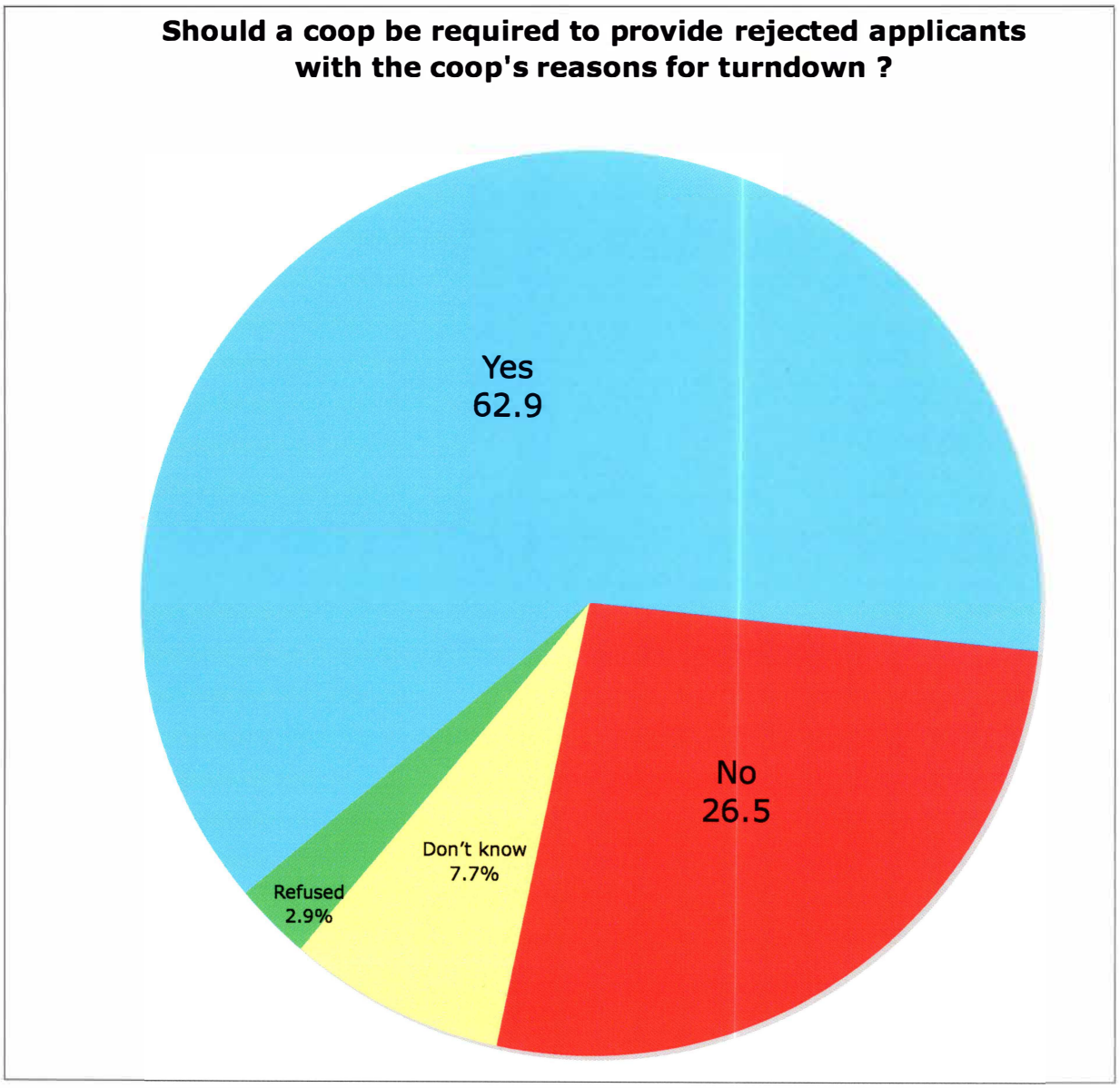
Using a 9-call design, SRBI randomly dialed the numbers obtained to get an equivalent number of responses from each of the strata. Calling proceeded during the period March 26 – April 11th, not including Sundays or the first two nights of the Passover holiday. SRBI personnel proceeded through a preliminary series of questions to confirm that respondents met the criteria for being qualified. A full listing of the questions posed and the responses thereto is set forth in the Appendix to this report (see pages 6-8).

Results and analysis

Of 454 people who were willing to cooperate, there were 310 qualified respondents. The full text of the question posed to qualifying respondents regarding coop disclosure was this:

> Under current law, a co-op is permitted to reject proposed purchasers of apartments for a wide range of legal reasons, but is not required to provide the rejected purchaser with the reasons for the rejection. Would you support changing the law in the following way: Continuing to allow co-ops to reject proposed purchasers of apartments for the same wide range of legal reasons as currently, but adding the requirement that co-ops give the person rejected a written statement of the reasons for turndown.

Responses are broken down on page 4 of this report, and demonstrate strong support from co-op owners themselves for a co-op disclosure bill.


Should a coop be required to provide rejected applicants with the coop's reasons for turndown ?
Yes
62.9
No
26.5
Don't know
7.7%
Refused
2.9%

Qualified respondents were also asked, "Which of the following statements best describes the co-op Board?" They selected from three statements. The order of the statements was computer-randomized for each respondent. Results are set forth below:

The Board generally thoughtfully considers the interests of all the shareholders before acting	55.8%
The Board is sometimes unresponsive to the needs of shareholders	16.8%
The Board is often arbitrary, arrogant, or authoritarian in dealing with issues facing the residents of the building	14.8%
Don't know	8.4%
Refused	4.2%

Margin of error

Taking into account the design effect of the survey, the margin of error was +/- 6.5%.

Response rate

The American Association for Public Opinion Research (AAPOR) has four methods of calculating response rate. Applied to these data, the rates range from 23.8 to 25.1 percent. All are considered good response rates in the context of Manhattan-based telephone surveys. For further information on AAPOR's standard methods, go to www.aapor.org.

For further information

Contact Craig Gurian of the Anti-Discrimination Center, at 212-655-5790.

APPENDIX – FULL SURVEY QUESTIONS AND ANSWERS

Question Q1 Single-Coded. Answered by 454

-1- Do you own the apartment in which you live?

		454 Tot/Ans	%/Ans
1.	Yes	355	78.2
2.	No	97	21.4
3.	ADD LATER()	0	0.0
4.	ADD LATER()	0	0.0
5.	ADD LATER()	0	0.0
6.	ADD LATER()	0	0.0
7.	ADD LATER()	0	0.0
8.	(VOL) Not sure	2	0.4
9.	(VOL) Refused	0	0.0

Question Q2 Single-Coded. Answered by 99

-2- Does someone else in your household own the apartment?

		99 Tot/Ans	%/Ans
1.	Yes	3	3.0
2.	No	95	96.0
3.	ADD LATER()	0	0.0
4.	ADD LATER()	0	0.0
5.	ADD LATER()	0	0.0
6.	ADD LATER()	0	0.0
7.	ADD LATER()	0	0.0
8.	(VOL) Not sure	1	1.0
9.	(VOL) Refused	0	0.0

Question Q3 Single-Coded. Answered by 3

-3- May I speak with that person?

		3 Tot/Ans	%/Ans
1.	Respondent coming to phone	0	0.0
2.	Respondent not available (SCHEDULE CALLBACK)	3	100.0
3.	ADD LATER(3)	0	0.0
4.	ADD LATER(4)	0	0.0
5.	ADD LATER(5)	0	0.0
6.	ADD LATER(6)	0	0.0
7.	ADD LATER(7)	0	0.0

8.	ADD LATER(8)	0	0.0
9.	(VOL) Refused	0	0.0

Question NINTRO Single-Coded. Answered by 3
[SCHEDULE CB FROM THIS SCEEN, IF NECCESARY]
RESPONDENT'S NAME: [+fnrespn+]
Hello, I'm %INAME% calling from SRBI public opinion research. I'm conducting an independent survey about local legislation, not about any product.

		3 Tot/Ans	 %/Ans
1.	Continue	3	100.0
2.	Schedule callback	0	0.0
3.	Refused	0	0.0

Question Q4 Single-Coded. Answered by 358

-4- Is the apartment a co-op?

		358 Tot/Ans	 %/Ans
1.	Yes	349	97.5
2.	No	8	2.2
3.	ADD LATER()	0	0.0
4.	ADD LATER()	0	0.0
5.	ADD LATER()	0	0.0
6.	ADD LATER()	0	0.0
7.	ADD LATER()	0	0.0
8.	(VOL) Not sure	1	0.3
9.	(VOL) Refused	0	0.0

Question Q5 Single-Coded. Answered by 349

-5- Are you a member of the co-op's Board of Directors?

		349 Tot/Ans	 %/Ans
1.	Yes	37	10.6
2.	No	310	88.8
3.	ADD LATER()	0	0.0
4.	ADD LATER()	0	0.0
5.	ADD LATER()	0	0.0
6.	ADD LATER()	0	0.0
7.	ADD LATER()	0	0.0
8.	(VOL) Not sure	2	0.6
9.	(VOL) Refused	0	0.0

Question Q6 Single-Coded. Answered by 310

-6- Which of the following statements best describes the co-op Board

		Tot/Ans	310 %/Ans
1.	The Board generally thoughtfully considers the interests of all the shareholders before acting	173	55.8
2.	The Board is sometimes unresponsive to the needs of shareholders	52	16.8
3.	The Board is often arbitrary, arrogant, or authoritarian in dealing with issues facing the residents of the building	46	14.8
4.	ADD LATER()	0	0.0
5.	ADD LATER()	0	0.0
6.	ADD LATER()	0	0.0
7.	ADD LATER()	0	0.0
8.	(VOL) Don't Know	26	8.4
9.	(VOL) Refused	13	4.2

Question Q7 Single-Coded. Answered by 310

-7- Under current law, a co-op is permitted to reject proposed purchasers of apartments for a wide range of legal reasons, but is not required to provide the rejected purchaser with the reasons for the rejection. Would you support changing the law in the following way:
Continuing to allow co-ops to reject proposed purchasers of apartments for the same wide range of legal reasons as currently, but adding the requirement that co-ops give the person rejected a written statement of the reasons for turndown.

		Tot/Ans	310 %/Ans
1.	Yes	195	62.9
2.	No	82	26.5
3.	ADD LATER()	0	0.0
4.	ADD LATER()	0	0.0
5.	ADD LATER()	0	0.0
6.	ADD LATER()	0	0.0
7.	ADD LATER()	0	0.0
8.	(VOL) Not sure	24	7.7
9.	(VOL) Refused	9	2.9

To City Council

I oppose the bills to require cooperatives to more oversight and legislation.

I have served on the Mainstay II cooperative board in Kew Garden Hills for almost twenty years.

I will resign if you enact these heavy handed tactics.

- In addition cooperatives will cease to exist. Shareholders in general do NOTV want to serve on Boards now and no one will WANT to do so EVER.
- Cooperatives will revert to market rent housing where tenants have no say in their households.
- Furthermore this will obliterate self managed share holder ownership
- Because there will be no Board Hardly anyone wants to serve on a board of directors Now and no shareholder in his or her right mind will do so in the future.
- There are many safety nets in place to protect prospective buyers from discrimination in purchasing a cooperative . You know that.
- Stop destroying middle class housing with these additional
- Legal burdens of proof.
- Thank you
-

I live in a ten-unit, self-managed co-op in a tenement building. This isn't a fancy building and we keep costs down for an array of shareholder incomes by self-managing. I am the Building Manager and it eats a lot of my time.

Aside from shareholder applicants being able to afford the mortgage and maintenance, our primary concerns are around the attitudes and potential contributions of an incoming shareholder. Participation is paramount in a building like ours and our application is very specific in that regard. Everyone's background equips them to contribute something or to learn to do something.

We must have a spirit of cooperation! Our shareholders include different ethnic backgrounds, religions and sexual orientations. I cannot see what this bill can possibly achieve to help protect against discrimination: important, enforceable laws already exist for that. On the other hand, it would make people unwilling to serve as officers and certify admission votes. It could potentially make it impossible for small co-ops to go forward as relatively affordable, middle-class housing.

In addition, how can a co-op Board (which is all of us in this co-op) explore potential projects and financial planning if our casual or committee discussions are subject to public scrutiny? When presented with a shareholder applicant, we not only provide tax returns but also unaudited yearly financial reports from our accountant and a projected budget for the coming year, in order to satisfy mortgage companies. How would it support the building's financial responsibility or transparency to be legally compelled to disclose all financial discussion?

Please oppose all three bills before the committee.

From: B.A.
To: District3; Testimony
Subject: [EXTERNAL] Re: Tomorrow's Hearing on Shared Housing — Join Us
Date: Monday, December 8, 2025 7:40:08 PM

[redacted]

Council member

I lived here in the 1980s when SRO's served as storage for homeless people, prostitutes, drug addicts and criminals.
It is a good thing we got rid of those infestations.
Single New Yorkers don't need SRO's, they've learned how to find apartments with roommates. It works just fine.

I hope your initiative fails.
I will make a note to vote against you the next time your name is on the ballot.
I am confident that my testimony will be deleted and will not reach the city council.

On Mon, Dec 1, 2025 at 3:28 PM Council Member Erik Bottcher <district3@council.nyc.gov> wrote:

> View this email in your browser * Forward to a friend * Sign up for email list
>
> 

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: [illegible]

Address: [redacted] 10025

I represent: Self.

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☑ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Julian Parker

Address: [redacted] Brooklyn, NY

I represent: Solid Ground

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☑ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Michael Bonfiglio

Address: [redacted] Brooklyn

I represent: Sunset Court Association

Address: 4002 - 4012 7th Ave Brooklyn

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438, 1120 Res. No. _____

☐ in favor ☒ in opposition

Date: Dec 2, 2025

(PLEASE PRINT)

Name: Corinne Arnold

Address: [redacted] - The Victoria - 500 Units

I represent: The Victoria & CNYC

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: HILLARY SCRIVANI

Address: 22 Reade St.

I represent: Commission on Human Rights

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: JoAnn Kanuf Ward

Address: 22 Reade,

I represent: NYC Commission on Human Rights

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438 1120 Res. No. _____

☐ in favor ☑ in opposition

Date: 12/2/2025

(PLEASE PRINT)

Name: Will Kwan

Address: _____

I represent: 139 East 33rd Street Corp (Co-op)

Address: 139 East 33rd Street NY NY 10016

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Michael Sandler

Address: _____

I represent: HPD

Address: 100 Gold St.

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2

(PLEASE PRINT)

Name: Neil Reilly

Address: _____

I represent: HPD

Address: 100 Gold

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2

(PLEASE PRINT)

Name: LUCY JOFFE

Address: _____

I represent: HPD

Address: 100 GOLD STREET

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: JOHN CURTIS

Address: [redacted] RIVERSIDE DRIVE #6D

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1120 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Yvette Watkins

Address: [redacted] Addisleigh Park

I represent: Long Island Board of Realtors

Address: 1330 Walt Whitman, Melville

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438 1120 Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: ALISON MASON

Address: [redacted]

I represent: 310 E 49th Corporation

Address: 310 E. 49th St NYC 10017

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 457, 488 1120 Res. No. _____

☐ in favor ☒ in opposition

Date: 12/2/15

(PLEASE PRINT)

Name: JORDAN BARONIA

Address: _____

I represent: [redacted] ATLANTIC AVE

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Brendan Cheney

Address: _____

I represent: New York Housing Conference

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jesse Horwitz

Address: [redacted] 10001

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: JOSEPH GARCIA

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: ERIK BLAHA

Address: _____

I represent: _____

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Martha Greenough

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: RICHARD W. MARK

Address: [redacted] NY, NY 10025

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/12/25

(PLEASE PRINT)

Name: Christopher Leon Johnson

Address: [redacted]

I represent: SCII

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: ARTHUR SCHWARTZ

Address: [redacted], NYC

I represent: Center for Independence of the Disabled

Address: 1010 Sixth Ave, NY, NY

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

50

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Logan Phales

Address: _____

I represent: Open New York

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

49

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Lucy West

Address: _____

I represent: _____

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 433, 1120 Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Arielle Hersh

Address: _____

I represent: UHAB

Address: 120 Wall St, 20th Fl, 10005

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: John Kosa

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Mestawet Endayalu

Address: [redacted]

I represent: My Family

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Clifford DuPree

Address: [redacted]

I represent: 136 E 64th Street Corporation

Address: 136 E 64th Street, NY NY 10065

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1120 Res. No. _____

☐ in favor ☒ in opposition

Date: 12/2/2025

(PLEASE PRINT)

Name: CAROL BAIRD

Address: [redacted] NY NY 10025

I represent: 645 West End Corp

Address: 645 West End Ave NY NY 10025

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438, 1120 Res. No. _____

☐ in favor ☐ in opposition

Date: 12-2-25

(PLEASE PRINT)

Name: JAMES STARKS

Address: [redacted]

I represent: 645 W END CORP.

Address: 645 W END AVE, NY 10025

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Isela Hinzo

Address: [redacted] Woodside NY 11377

I represent: NYSAR.

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☑ in opposition

Date: 12/02/2025

(PLEASE PRINT)

Name: David Fitzhenry

Address: c/o Moritt Hock & Hamroff LLP, 1407 Broadway, 39th Fl. New York, NY 10018

I represent: N/A

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438, 1120 Res. No. _____

☐ in favor ☑ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Stuart Saft

Address: [redacted], NY 10022

I represent: 10 Hudson Yards

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 401, 435, 1120A Res. No. _____

☐ in favor ☑ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: MITCHEL LEVINE

Address: [redacted]

I represent: 11 Riverside Dr Corp.

Address: 11 Riverside Dr, 10023

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407/438 Res. No. _____

☐ in favor ☑ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Jill Eisner

Address: [redacted] N.Y. NY 10021

I represent: 444 E 75th St

Address: 444 E 75th St

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☒ in opposition

Date: Dec 2, 2025

(PLEASE PRINT)

Name: Matt McClanahan

Address: [redacted]

I represent: myself

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1120 Res. No. _____

☑ in favor ☐ in opposition

Date: 12/02/2025

(PLEASE PRINT)

Name: Crystal Hawkins-Syska

Address: [redacted] WP, NY

I represent: Hudson Gateway Association of Realtors

Address: 1 Maple St White Plains, NY

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 409 Res. No. _____

☑ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jessica Arde

Address: [redacted] Bayside NY

I represent: NYSAR

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1120 Res. No. _____

☑ in favor ☐ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Michael Kelly

Address: [redacted] Selkirk, NY 12158

I represent: NYS Assoc. of Realtors

Address: 130 Washington Ave, Albany, NY 12210

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438, 420A Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: JOHN VETERE

Address: [redacted] 31 Ave, [redacted]

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 438 1120 Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: NATHAN J. LICHTENSTEIN

Address: [redacted] NY NY

I represent: 315 WEST 55th OWNERS CORP.

Address: 315 WEST 55th ST, NY NY

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Geoffrey MAZEL

Address: [redacted] Great Neck NY

I represent: Coop Boards

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 401 Res. No. _____

☐ in favor ☑ in opposition

Date: 12-2-2025

(PLEASE PRINT)

Name: WARREN SCHREIBER

Address: [redacted] BOHEMIA, NY 11716

I represent: PRESIDENTS CO-OP & CONDO COUNCIL

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☒ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: BOB FRIEDRICH

Address: [redacted] GLEN OAKS

I represent: Presidents Co-op & Condo Council

Address: Same As Above

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438, 1120 Res. No. _____

☐ in favor ☒ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Mary Ann Rothmeier

Address: [redacted] NY 10024

I represent: CNYC - Council of NY Cooperatives & Condominiums

Address: 890 7th Ave, #1103, NY 10019

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438 Res. No. _____

☐ in favor ☒ in opposition

Date: 12/2/2025

(PLEASE PRINT)

Name: TANIA ARIAS

Address: [redacted] Tudor City

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: STEPHANIE J SPADARO

Address: [redacted] BKLYN NY

I represent: MARINA COOPERATIVE APTS INC.

Address: 514A

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: 12-2-2025

(PLEASE PRINT)

Name: MEG GOBLE

Address: [redacted] Bklyn

I represent: Heights 75 Owners

Address: 75 Livingston

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: 12-2

(PLEASE PRINT)

Name: GERRY MOORE-MURRAY

Address: [redacted] TUDOR CITY PLACE

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407, 438, 1120 Res. No. _____

☐ in favor ☒ in opposition

Date: 12/2/2025

(PLEASE PRINT)

Name: REBECCA POOLE

Address: [redacted]

I represent: CNYC

Address: 570 7TH AVE, NYC NY 10019

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: GARY MARTIN

Address: [redacted], Brooklyn NY

I represent: FIFTY SIX GARDEN PLACE CORP.

Address: 56 Garden Place, Brooklyn, NY

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: ALICIA FERNANDEZ

Address: [redacted] I.C. NY 11106

I represent: Queensview, Inc.

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407 Res. No. _____

☐ in favor ☐ in opposition

Date: 12/2/25

(PLEASE PRINT)

Name: Yvonne Pena

Address: 633 Third Ave. 10th Floor, New York, NY

I represent: Community Service Society of NY

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 407/438/1120 Res. No. _____

☐ in favor ☑ in opposition

Date: 12/2

(PLEASE PRINT)

Name: Melissa Marks-Smith

Address: [redacted] NY NY 10024

I represent: Myself and my fellow shareholders

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Britny McKeever

Address: _____

I represent: _____

Address: _____

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