



The Department of Finance Deed Theft Hearing Testimony

Good afternoon, Chair Hudson and Chair Menin, as well as the members of the Aging committee and the Consumer and Worker Protection committee. My name is Colette McCain-Jacques, and I am the City Register for the NYC Department of Finance.

Since 2014, the Department of Finance, in both the City Register and the Sheriff's Office, have been focused on confronting the root causes of deed fraud that target our most vulnerable New Yorkers. As many of you know, there are heart breaking stories where older New Yorkers, living on a fixed income, are coerced into signing a document that eventually leads to them giving away their property for either no money or a fraction of what it is truly worth. This issue impacts New Yorkers across all five boroughs.

Before I jump into the root causes and the signs of potential deed fraud, I'd like to take a step back and explain the role that the Office of City Register plays. Each year, well between 300,000 and 500,000 documents are processed by the office that include all different actions against properties, including the recording of deeds which are made available for public inspection. For example, if a property owner refinances their mortgage or transfers a deed, these actions require a filing with the Office of the City Register, which means it needs to be processed by a member of my staff.

The office of the City Register plays a ministerial role in the recording of deeds. The office is limited by state law. State law requires the City Register to perform the ministerial act of recording a deed as long as it is in recordable form, meaning that it (i) is certified by a public notary; (ii) has a seller's signature and a buyer's signature under certain circumstances; and (iii) includes all other required legal documents. The City Register does not have discretion with respect to recording of deeds that meet these requirements.

Although the Office of the City Register is limited by State law, there are still proactive steps the Department of Finance has taken to help prevent deed fraud.



We have trained City Register staff to better detect documents that may be forged or fraudulent and put in place several safeguards, including the involvement of the Sheriff's Office in the review process.

After an internal review of our recording process, we discovered that quitclaim deeds are the most common type of deed used by perpetrators of deed fraud. The staff now pays particular attention to these submissions. When the staff identifies a discrepancy that appears to indicate possible fraud, they refer it to the Sheriff's Office for review.

Examples of other types of recordings that would trigger an additional review are those with a sale price far below market value, multiple transfers between LLCs within a short period of time, and transfers by people or entities suspected of committing or known to have committed deed fraud in the past. These safeguards have been in effect since July 2014, when we increased our focus on deed fraud, and we continue to make improvements as we see patterns that need to be addressed. In addition, as part of the review process, City Register staff verifies the notary information on the New York State Attorney General's Office website, and discrepancies are sent to the Sheriff's Office for closer review.

We also automatically inform property owners by mail when a deed is filed against their property. The earlier that someone catches fraudulent activity, the more quickly the problem can be addressed.

In addition to our efforts in my office, the Sheriff's office plays a vital role in handling the potential fraudulent cases. Since 2014, the Sheriff's Office has taken many proactive measures to reduce deed fraud and investigate crimes related to deed fraud. We are hopeful that with the State taking important steps to expand deed theft protections and creating harsher penalties for the perpetrators, we will continue to see a decrease in cases. Our investigations in the past ten years have resulted in the arrest of 58 suspects tied to fraudulent property transactions. The total value of these properties was in excess of \$52,000,000.

Our most effective enforcement tool is proactive outreach and empowerment of homeowners before they are put in a compromised situation. The Department of Finance's Outreach Unit has been informing event attendees



about deed fraud and how to prevent it since early 2016. Their work has reached over 100,000 taxpayers at over 1,800 events.

DOF has partnered with the Department of Aging, HPD, and DCWP for housing resource fairs to provide education for older New Yorkers, including deed theft education. Agency partnerships as well as elected partnerships are the most important types of outreach the city can do.

I would like to thank Borough President Reynoso for recently inviting us to a town hall where our outreach team spoke with New Yorkers directly about how to protect themselves from deed fraud.

In addition to the outreach team, the Office of the Taxpayer Advocate has conducted outreach events with the IRS, New York State, other government agencies, and not-for-profit partners on the topic of deed fraud. During these events they educate tax professionals and taxpayers on the topic of deed fraud and encourage everyone to be vigilant about fraud prevention.

During the outreach sessions, we give presentations which include a section on deed fraud and what people can do to protect their properties. The Outreach Unit has distributed tens of thousands of copies of our deed fraud guide, which is available in 10 languages at www.nyc.gov/finance.

Over the past few years, the Outreach Unit has also conducted hundreds of train-the-trainer sessions, at which they educate elected officials and community-based organizations on the topic of deed fraud. This is an ongoing effort, and we encourage members interested to contact us to schedule a session.

Turning to today's legislation, the Administration supports the intent of both bills up for consideration today, with proposed amendments.

Introduction 888 would require DCWP to ensure that parties that make unsolicited offers to purchase residential property, provide the owners with a disclosure of the market value of the property. It would also require DCWP to establish a database of residential property market values. While DCWP agrees with the goal of providing potential sellers with important information regarding their homes, especially in the case of unsolicited offers, we are concerned that an

approach focused on DCWP assessing home market values would be unreliable for home sellers.

Instead, we recommend that any business or person making an offer to purchase a residential property be required to provide the owners with an itemization of their rights and protections as prospective sellers. This would fall in line with existing practices that DCWP has successfully established in the used car, paid tax preparer, and debt collection industries.

Introduction 901 would require DCWP's office of financial empowerment to provide counseling to homeowners, in coordination with HPD's office of the homeowner advocate. DCWP's financial empowerment centers do not provide mortgage counseling, housing scam prevention or home repair financing. These services, including legal services support, are offered by HPD in collaboration with community-based organizations, such as the Center for NYC Neighborhoods. Our colleagues at HPD can further elaborate on that specific work. The Administration believes this legislation presents an exciting opportunity develop a deeper partnership between these two agencies, leverage their respective networks to support more communities in New York City, and achieve the goals of this legislation. The Administration remains committed to uplifting New Yorkers as they build and protect their assets through these resources

I want to thank the Council for allowing me to speak today and I hope that our testimony has given you a useful overview of where we stand regarding deed fraud. I will take any questions you may have at this point.



JUMAANE D. WILLIAMS

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON AGING AND COMMITTEE
ON CONSUMER AND WORKER PROTECTION
NOVEMBER 19, 2024**

Good Afternoon,

My name is Jumaane D. Williams, the Public Advocate for the City of New York. Thank you to Chairs Hudson and Menin, and committee members for holding this hearing.

In the midst of the pandemic, my office began to receive Deed Theft complaints from constituents seeking legal assistance. My staff advised these concerned and afraid citizens to share their complaint with the Attorney General's Office. The New York State Attorney General does not have the legal authority to assist individuals in court, and therefore could not always prevent these individuals from further legal troubles. According to a report done by that office, between 2014 and 2019, New York City received around 3,000 complaints regarding Deed Theft.¹ Of those 3,000 complaints, 45% of them came from Brooklyn. That number might be higher due to the likelihood of homeowners not knowing they are victims of this kind of scam.² By the time a homeowner realizes that they are a victim, their home could be sold or mortgaged multiple times.

This time last year, Governor Hochul signed an anti-Deed Theft bill into law³, assisting prosecutors with challenging fraudulent real estate transactions. The Governor and Attorney General both publicly stated that Deed Theft has disproportionately affected Black and Brown homeowners.⁴ Despite this recognition, victims are still targeted in our city and in need of additional protections, especially our elders and those who may be more vulnerable to forgery, fraud, and other scams and tricks⁵.

Councilmember Hudson's bill requires a purchaser of a property to disclose the market value of substantially similar properties listed for sale in a publicly searchable database, as designated by rules of the Department of Consumer and Worker Protection. The bill also penalizes any purchaser of property who violates this law with civil penalties that will increase if there are subsequent violations.

¹ <https://ag.ny.gov/press-release/2020/attorney-general-james-launches-protect-our-homes-initiative-combat-deed-theft>

² <https://www.nytimes.com/2019/10/21/nyregion/deed-theft-brooklyn.html>

³ <https://www.governor.ny.gov/news/governor-hochul-signs-legislation-protect-new-york-homeowners-deed-theft>

⁴ <https://www.nysenate.gov/newsroom/press-releases/2023/brian-kavanagh/governor-hochul-signs-legislation-protect-new-york>

⁵ <https://amsterdamnews.com/news/2024/08/22/deed-thft-cases-threaten-to-deplete-nys-black-wealth/>

I am also here today in support of Councilmember Riley's bill. This legislation seeks to provide counseling and support to homeowners through the Office of Financial Empowerment and the Office of the Homeowner Advocate.⁶ Importantly, this measure gives homeowners a program to assist them with planning their finances, navigating their mortgages, and recognizing scams from bad actors.

These bills represent an exceptional opportunity to have both a safeguard against swindlers and a mechanism for educating folks about the value of their communities. If enacted, they will help curtail the behavior of those who have found it easy to steal property and deplete the wealth of historic Black and Brown communities. I applaud Councilmembers Hudson and Riley for introducing these bills and hope that they can serve as the benchmark for other needed legislation that actively protects our longstanding communities.

Thank you.

⁶ <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6695284&GUID=9E226DE0-E6E7-4369-BBAB-1DD934C4923D&Options=&Search=>



OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO

Brooklyn Borough President

City Council Committees on Aging and Consumer and Worker Protection

Oversight Hearing: Deed Theft

11.19.24

Good afternoon, Chairs Hudson and Menin and members of the committees, and thank you for holding this hearing today. I am here representing Brooklyn Borough President Antonio Reynoso.

Deed theft is a pressing issue in Brooklyn, especially for older adult homeowners in the Central and Eastern parts of the borough. Homeownership is one of the most important pathways to building and sustaining wealth. When deed theft scammers target these communities, they are trying to displace our neighbors and lock Black and Brown families out of homes that they have had for generations.

Last month, our office held a workshop at Medgar Evers College with Brooklyn Legal Services and Grow Brooklyn to educate homeowners on their rights and how to avoid scams. According to BLS, the most common scams these homeowners may face are refinancing scams, equity stripping, and foreclosure bail out loans. In short, these scammers take advantage of vulnerable homeowners who may be having trouble making mortgage payments, have bad credit, and/or are at risk of foreclosure.

Education is the best preventative measure we can take, which is why we are bringing information directly to communities. Borough President Reynoso also wants to shout out Attorney General Tish James for all the advocacy she has done on this issue, and the State legislature for reforms that went into effect this summer to make deed theft a crime, extend the statute of limitations on prosecuting these crimes, and grant more oversight to the Office of the State Attorney General.

These were important reforms that we are hopeful will have a real impact in our communities, but there is still more we can do.

1. **Further extend the Statute of Limitations on prosecution.** The new State law dictates that prosecution must begin within five years of the theft or two years after the rightful owner realizes their deed was stolen, whichever occurs later. The State should extend this two-year window further to allow time for homeowners who realize their deed has been stolen additional time to report to law enforcement so that prosecution can begin, since they are also addressing civil issues and figuring out their options.
2. **Expand access to legal services.**
 - Create a Tangled Title Fund modeled on Philadelphia's. The City of Philadelphia supports this program through its Division of Housing and Community Development. An independent Advisory Committee oversees the fund, which is administered through a non-profit called Philadelphia VIP. The fund provides up to \$4,000 each for qualified homeowners to cover administrative, legal, and other costs that may arise in resolving a homeownership issue. BP Reynoso commends the City Council for starting to think about what this would look like

through its Estate Planning Initiative, but the required funding to make this work at scale is much more than provided so far.

- Increase funding for community lawyers generally. In addition to the Tangled Title Fund work, local legal services organizations provide educational outreach, workshops, and other critical legal support. They are an important line of defense against these scammers, and we must prioritize them in FY 2026 budget negotiations.
3. **Pass legislation to expand outreach and education:** Both bills being heard today will help accomplish this. However, a few important bills are in the Finance Committee and are not being heard today. These are:
- **Intro 0067**, sponsored by Public Advocate Williams, would specifically require the Department of Finance, in consultation with HPD and DCWP, to conduct outreach and education regarding deed fraud and foreclosure prevention assistance fraud, including referral resources for legal assistance.
 - **Intro 782**, sponsored by Council Member Nurse, would require DOF to send information with property tax bills, including availability of exemptions such as SCRIE and DRIE; and about how to register for the ACRIS Alert system so they will receive an alert when deeds, mortgages, and other documents are recorded against their property.
 - **Intro 1086**, sponsored by Council Member Williams, would require DOF to conduct more proactive outreach to property owners when deed- or mortgage-related documents are recorded against their property, including by email, text, and mail, depending on what information DOF has for that homeowner.

Borough President Reynoso encourages the Council to convene the Finance Committee to hear these bills before the end of the year, and looks forward to working with you all on these and other efforts to keep New Yorkers in their homes. Thank you.

REBNY Testimony | November 19, 2024

The Real Estate Board of New York to The New York City Council Committees on Consumer and Worker Protection and Aging regarding Deed Theft

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. We appreciate the opportunity to submit comments in support of the legislative solutions offered in Intro 888 and Intro 901 to combat deed theft.

Deed theft is a scourge that has a particularly outsized impact on communities of color and disrupts the stability and benefits of homeownership to New Yorkers. Significant action has been taken over the last two years, led by the New York State Attorney General, to close gaps in enforcement authority and boost reclamation efforts by homeowners who were the victims of fraudulent behavior to steal their homes. REBNY supports local action to supplement this work.

BILL: Intro 888

SUBJECT: This bill would amend the administrative code to require disclosures of market value for unsolicited offers to purchase residential properties.

SPONSORS: Council Members Hudson, Brewer, Hanif and Williams

Intro 888 proposes a new disclosure document in residential sales transactions where the bid was unsolicited by the owner. The bill also establishes a fine structure of a civil penalty for each violation. If enacted, the law would take effect 120 days after.

This bill will create a necessary level of transparency in unsolicited purchase requests with the requirement for a disclosure of market value. We support the provision of written agreements in residential transactions and support this commonsense approach. The Department of Consumer and Worker Protection should create a standard form for the disclosure document.

BILL: Intro 901

SUBJECT: This bill would amend the administrative code to require the office of financial empowerment to provide assistance to homeowners.

SPONSORS: Council Members Riley, Restler, Brannan, Gutiérrez and Williams

Intro 901 will require the Office of Financial Empowerment in the Department of Consumer and Worker Protection to provide support and counseling to homeowners and their heirs on a variety of financial literacy topics such as mortgage counseling and estate planning.

We encourage the City Council to work with the Mayoral Administration to make sure such efforts are well funded and that courses are provided electronically and in the top ten languages of the city. REBNY also recommends that the pertinent City offices work with not-for-profit partners and industry groups like REBNY to provide opportunities to boost these educational offerings on a scale to reach as many communities as possible on a rolling basis.

Thank you for your consideration of these points.

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WRITTEN TESTIMONY FOR THE NEW YORK CITY COUNCIL COMMITTEES ON AGING, CONSUMER &
WORKER PROTECTION, AND HOUSING & BUILDINGS JOINT OVERSIGHT HEARING ON DEED
THEFT BY BROOKLYN LEGAL SERVICES CORPORATION A

November 19, 2024

Dear Committee Chairs and Council Members,

Thank you for the opportunity to comment at the Committees on Aging, Consumer & Worker Protection, and Housing & Buildings joint oversight hearing on deed theft. My name is Tamara del Carmen and I am the Director of the Consumer and Economic Advocacy (CEA) Program at Brooklyn Legal Services Corporation A (Brooklyn A).

Brooklyn A is a civil legal service provider and member of the New York Legal Services Coalition (NYLSC) and the Leap Coalition. Our mission is to wield community-focused civil legal services to confront injustice. Brooklyn A works to ensure all New Yorkers have equal access to legal services to seek justice, make their voices heard, and overcome systemic oppression and racism. We address the myriad systemic issues facing our communities by providing a combination of legal assistance, including full legal representation, brief advice/services, and community education, to marginalized populations—including the low-income working poor, the unemployed or underemployed, the disabled, seniors, survivors of domestic violence, families in crisis, community-based organizations ("CBOs"), and largely women, immigrant, and BIPOC-owned small businesses throughout New York City ("NYC").

The bills being considered by this committee—Int 0901-2024 and Int 0888-2024—improve protections for New York City homeowners, an effort Brooklyn A supports through our work with clients and legislation. We know first-hand the importance of expanding education and outreach to homeowners vulnerable to scams like deed theft. The more the city and service providers can support, counsel, and inform struggling homeowners about the legitimate resources available to them for mortgage relief, the less likely they are to fall prey to scams. These protections help longtime New York families remain in their neighborhoods and build generational wealth. By requiring the Office of Financial Empowerment and the Office of the Homeowner Advocate to offer counseling to homeowners, Int 0901-2024 adds a valuable protection to families' financial security.

Transparency in real estate transactions is also important for protecting homeowners. Brooklyn A recently worked with Council Member Nantasha Williams on a bill (Int 1086-2024) to address predatory title clouding. This bill would require the Department of Finance to notify all interested parties of any deed or mortgage-related document being recorded for a property. The goal is to prevent bad actors from causing irregularities in the chain of title, which can result in homeowners losing their property. Int 0888-2024 has a similar goal of improving transparency. Much like with the clouding title bill, this legislation would equip homeowners with valuable information. By requiring that unsolicited offers are accompanied by the property's market value and the price for similar

properties, this bill would protect homeowners in financial distress from being pressured into selling their property for below market value.

Foreclosures disproportionately affect communities of color, who have faced historic barriers to property ownership and accumulation of wealth. More than half of the median wealth gap between Black and white seniors can be attributed to racial differences in housing wealth, according to the Panel Study of Income Dynamics. Additionally, Black and Latine homeowners have substantially lower return on investment due in part to a higher rate of distressed sales caused by foreclosure (National Bureau of Economic Research). The higher rate of foreclosures threatens the potential for greater intergenerational wealth for largely BIPOC low- and moderate-income homeowners.

Many foreclosures are the result of predatory lending scams, which target people with lower credit scores and less cash on hand. In New York City, these borrowers are often people of color. The elderly, whose wealth is more likely to lie in assets, such as their homes, are also more likely to be targeted.

Brooklyn A's Consumer and Economic Advocacy (CEA) Program provides vulnerable homeowners with legal services to protect economic equity. Over the past year, most of our foreclosure cases were in Kings and Queens counties, the counties with the highest foreclosure rates in NYC. Brooklyn A provides clients facing foreclosure with representation, advice, counsel, and referrals; helps homeowners prepare answers and discovery demands; represents clients at settlement conferences and in motion practice relating to settlement conferences; negotiates loan modifications; defends homeowners in wrongful foreclosure actions; and commences affirmative litigation challenging predatory lending practices, mortgage fraud, and housing discrimination.

In Fiscal Year 2024, we defended 365 individuals and families from foreclosure discriminatory practices by predatory lenders, financial institutions, and home rescue scam artists. Of these homes, over half were owned by seniors, and 85% were owned by people of color.

Brooklyn A was the first and is still one of the only legal service organizations in New York City whose foreclosure prevention practice includes complex bankruptcy cases suitable to resolving foreclosure matters. The bankruptcy code allows for an array of otherwise unavailable remedies, including forcing a bank to reinstate a defaulted loan, stripping of second and third mortgages from the property, reducing loans to the value of the property in limited circumstances, removing judgment liens attached to the property, protection of co-signers from liability, forcing state and federal agencies to accept back taxes being paid over time, and stopping wage garnishments, among others. Expedient handling of a bankruptcy case also eliminates the arrears, interest, and penalties that can develop and build up from delays in state court.

With more state resources, Brooklyn A and our peers could expand our work, protect more homeowners from foreclosure, and pursue other creative ways of defending clients' greatest

financial assets. Bills like the ones being reviewed for this hearing offer another valuable tool for service providers to keep New Yorkers safely in their homes.

Thank you for the opportunity to share this testimony and your continued dedication to protecting homeowners in New York City.

Sincerely,

Tamara del Carmen, Esq.
Director of the Consumer & Economic Advocacy Program
Brooklyn Legal Services Corporation A



Testimony Before the City Council Committee on Aging: Oversight - Deed Theft Jointly held with the Committee on Consumer and Worker Protection

November 22, 2024

Good afternoon. My name is Christie Peale, Executive Director/CEO of the Center for NYC Neighborhoods. I would like to thank Chair Hudson, Chair Menin and the members of the Committee on Aging and Consumer and Worker Protection for holding today's hearing on the important topic of deed theft.

About the Center for NYC Neighborhoods

The Center promotes and protects affordable homeownership in New York so that middle- and working-class families are able to build strong, thriving communities. Established by public and private partners, the Center meets the diverse needs of homeowners throughout New York State by offering free, high quality housing services. Since our founding in 2008, our network has assisted over 40,000 homeowners. We have provided approximately \$33 million in direct grants to community-based partners, and we have been able to leverage this funding to oversee another \$30 million in indirect funding support. Major funding sources for this work include the New York City Department of Housing Preservation and Development, the New York City Council, and the Office of the Attorney General, along with other public and private funders.

Deed Theft: A Growing Threat for Vulnerable New York City Homeowners

At the Center, we are always monitoring and responding to emerging threats to homeowners, especially our lower-income, long-term residents and neighbors who are aging in place. Unfortunately, we are currently seeing an alarming increase in deed theft scams targeting homeowners who are otherwise at risk of foreclosure. **From our Homeowner Hub, this year we have already seen a 29% increase in homeowners who call us asking for deed theft referrals. We have also noted a rise in solicitation scams targeting senior homeowners.** Like many scammers, they present themselves as offering home-saving solutions to families desperate for a way out of foreclosure, but end up taking their homes out from under them.

Deed theft scams are a form of foreclosure rescue scam that involve the fraudulent transfer of ownership of a home to a third party. Sometimes homeowners are tricked into signing over their deed, believing they are signing some other type of legal document. In other instances, the homeowner may be aware that they are signing over title to their home, but are falsely promised the transfer will be temporary as they seek a refinancing, modification, or second mortgage. After signing over title to the home, the homeowner will typically make "lease" payments to the scammer until the scammer moves to evict them in housing court and takes possession of the home, usually to sell at a profit.

Deed Theft Scams and the Foreclosure Crisis

The rise of deed theft in New York City is fueled by the explosive combination of rapidly increasing home values, an aging housing stock and a huge number of New Yorkers who are struggling financially. Today, tens of thousands of New York City families are in foreclosure, while many more struggle to make monthly mortgage payments. The negative impacts of the foreclosure crisis are felt citywide, but are seen particularly in communities of color, which were disproportionately targeted and are still harmed today by the predatory lending that caused the financial crisis.¹ Nationally, half of the collective wealth of African-American families was lost during the Great Recession as a result of the dominant role of home equity in their total net worth and the prevalence of predatory high-risk loans in communities of color. Likewise, the Latino community lost an astounding 67% of its total wealth during the housing collapse.²

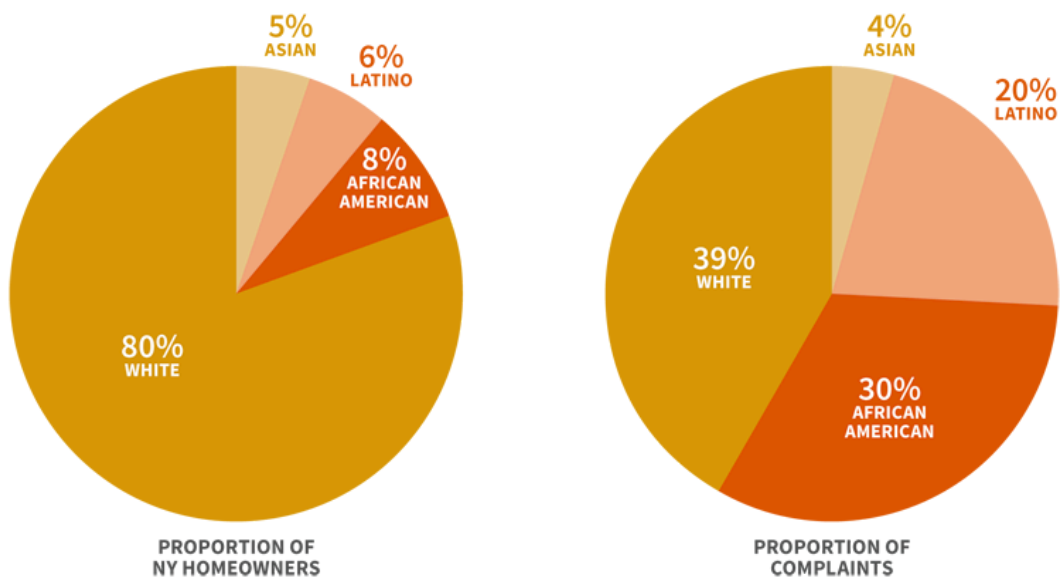
The foreclosure crisis has created wave after wave of foreclosure rescue fraud, since New York dealt with deed theft and mortgage mod scams early on in the crisis and now deed theft again now that home values have increased so markedly. This cottage industry of groups offering foreclosure rescue services under false pretenses feeds on the desperation and confusion of homeowners, who have often been unable to reach a resolution with their banks on their own, and who do not know where to go for help. In fact, many foreclosure rescue scams today involve the same bad actors who once marketed these risky mortgage products to vulnerable communities. Once the market for originating predatory mortgages dried up, many former mortgage brokers simply stayed in the same neighborhoods and re-established themselves as supposed “foreclosure experts.”

Similar to the fallout from the foreclosure crisis, foreclosure rescue scams, including deed theft, disproportionately harm homeowners of color. As demonstrated in the below chart, minority homeowners are much more likely to have been scammed compared to white homeowners in New York.

¹ Center for Responsible Lending, *Lost Ground*, 2011: Disparities in Mortgage Lending and Foreclosures, at 3. Available at <http://www.responsiblelending.org/mortgagelending/researchanalysis/LostGround2011.pdf>. See also National Community Reinvestment Coalition, *The Broken Credit System: Discrimination and Unequal Access to Affordable Loans by Race and Age*, 2003. Available at: http://www.omm.com/omm_distribution/newsletters/client_alert_financial_services/pdf/ncrcdiscrimstudy.pdf; Center for Responsible Lending, *Unfair Lending: The Effect of Race and Ethnicity on the Price of Subprime Mortgages*, 2006. Available at: <http://www.responsiblelending.org/mortgagelending/researchanalysis/unfairlendingtheeffectofraceandethnicityonthepriceofsubprimemortgages.html>.

² Institute on Assets and Social Policy, Brandeis University, *The Roots of the Widening Racial Wealth Gap: Explaining the BlackWhite Economic Divide*, 2013, at 4. Available at <http://iasp.brandeis.edu/pdfs/Author/shapirothomas/racialwealthgapbrief.pdf>.

Racial Disparity of Scam Victims, by Scams Reported to the National Loan Modification Scam Database



Recommendations:

At the Center for NYC Neighborhoods, combatting deed theft is a major priority. [For over ten years](#), we have partnered with the New York State Attorney General’s Office to get the word out about scams and make sure homeowners know where to find free, trustworthy help with their mortgages.

The good news is that there are high-quality housing counseling and foreclosure prevention legal services available free-of-charge to all New Yorkers through Attorney General James’ [Homeowner Protection Program](#), for which the Center serves as the New York City Anchor Partner. Homeowners can access these services through 311 or by calling the Attorney General’s Homeowner Protection Program Hotline at 855-HOME-456. In New York City, the Attorney General funds 31 community-based organizations that provide free housing counseling and legal services throughout the five boroughs.

While we’re proud of the strong network of resources available for homeowners, it will take the work of all of us to eradicate deed theft and other forms of foreclosure rescue scams. We respectfully submit the following recommendations:

Support for Intro 0888 - Although we support the legislation, we recommend several revisions to the proposed bill which are critical to ensuring it achieves its stated intent, strengthen its provisions, deter fraudulent activities, and clarify the valuation process. Specifically, we suggest the following:

1. Fraudulent Misrepresentation of Estimated Market Value:

- Any purchaser who submits an inaccurate or deliberately misleading estimate of the market value of a property shall be considered to be engaging in fraudulent activity. This should be explicitly recognized as fraud and subject to criminal investigation and prosecution. Law enforcement agencies should have the authority to investigate these violations and pursue criminal charges, rather than limiting penalties solely to civil fines.
- The potential financial benefit of fraudulently undervaluing a property, particularly when substantial equity is at stake, necessitates a stronger deterrent than a civil penalty alone. Given that investors who engage in these tactics may be well-versed in manipulating property values for profit, the current penalties are unlikely to dissuade such behavior. A criminal penalty, alongside a civil penalty, would provide a stronger deterrent against these fraudulent practices.

2. Clearer Definition and Reliable Valuation Mechanism:

- The bill should require a **certified Broker Price Opinion (BPO) or independent appraisal** to determine the accurate market value of the property. Relying solely on the purchaser's estimate opens the door to manipulation, as valuations can vary widely depending on the methods used.
- The BPO or appraisal must be conducted by a qualified professional who holds appropriate credentials to ensure an unbiased, accurate valuation. This will place responsibility on a certified individual or organization, making it more difficult for the purchaser to submit an artificially low market value.
- In addition to the certified BPO or independent appraisal, the market value as determined by the **Department of Finance** (not the assessed value) should also be included in the disclosure. This will ensure that the valuation reflects current market conditions rather than outdated assessments or subjective appraisals.

3. Revised Penalty Structure:

- As mentioned, the proposed civil penalties of \$250 for a first violation and \$500 for subsequent violations are insufficient given the potential financial gains from fraudulent undervaluation of properties. These penalties should be significantly higher to serve as a meaningful deterrent to would-be violators.
- We recommend that the bill include a graduated penalty structure that scales with the value of the property in question, making the penalties proportionate to the potential harm caused. For example, a violation related to a property valued over a certain threshold (e.g., \$500,000) could result in fines in the range of \$5,000 to \$50,000 or more, with criminal penalties available for repeat offenders or egregious cases of fraud.
- Additionally, the bill should include provisions for recovery of damages by the property owner if they are found to have been subjected to fraudulent undervaluation.

4. Clarifying "Substantially Similar Properties" and Public Database:

- The bill should clearly define "substantially similar properties" to ensure consistency in how the comparison is made. This includes specifying criteria such as size, location, age, condition, and other factors that influence property value.
- The publicly searchable database referenced in the bill should also be carefully curated and maintained to ensure that it contains up-to-date and accurate listings of comparable properties. The Department of Consumer and Worker Protection (DCWP) should be given clear guidelines on how to implement and manage this database, with regular audits to ensure its reliability.

By incorporating these recommendations, the bill would significantly enhance its ability to protect property owners from potential exploitation, particularly those who may not be aware of the value of their properties. The inclusion of certified appraisals, independent valuations, and stronger penalties will help ensure that the intent of the law—to promote transparency and fairness in property transactions—is realized effectively.

We support the aims of **Intro 901**, as it seeks to provide essential financial planning, mortgage counseling, and scam prevention services to homeowners and their heirs. However, we encourage the council to leverage existing resources, such as those offered by the Center for NYC Neighborhoods and its Network Partners, which already provide comprehensive financial and housing counseling, as well as estate planning services. Notably, the Council recently approved a new estate planning initiative aimed at offering free services to homeowners across all five boroughs, which could be an excellent resource for those in need. Additionally, homeowners facing deed theft who contact 311 are directed to the Homeowner Hub—a valuable service funded through the council's foreclosure prevention initiative, which provides assistance, advice, and referrals. By coordinating these existing programs, the council can maximize its efforts, ensure greater accessibility for homeowners, and avoid duplicating services.

We look forward to working with the City Council and the Administration to bring substantial reforms to protect homeowners facing deed theft. Thank you for the opportunity to testify today, and for your commitment to fighting deed theft. We look forward to working with you to advance the recommendations made here.



**TESTIMONY OF LEGAL SERVICES NYC
CONCERNING THE PRACTICE OF DEED THEFT**

*New York City Council
Committee on Consumer and Worker Protection & Committee on Aging
November 19, 2024 1:00 pm*

Good afternoon. My name is Randi Scherman, and I am a senior staff attorney in the Neighborhood Economic Justice Project at Brooklyn Legal Services, a program of Legal Services NYC, which is the nation's largest provider of free civil legal services to those in need. To keep homeowners in their homes, we use all tools available at our disposal, including complex federal and state litigation. Since 2009, our foreclosure prevention projects have represented thousands of families across Brooklyn, Queens, the Bronx and Staten Island at risk of losing their homes to foreclosure and real estate frauds and scams. We also engage in community education and policy advocacy, and thank the City Council for this opportunity to address one of the most pressing issues facing us as a City today: deed theft.

Deed theft devastates homeowners and their families in our city, and the effects ripple out through communities, ultimately touching us all. Unfortunately, over the years, Legal Services NYC has become experienced at investigating and litigating all types of property fraud scams. Our work has given us a unique insight into how to combat the fraudulent practices scammers use to ensnare homeowners and take away their homes. These predatory practices are growing at an alarming rate, and their impact on our most vulnerable residents is nothing short of catastrophic. We'd like to thank the City Council for its thoughtful engagement with the problems facing our clients and their communities.

As an advocate who has represented countless vulnerable homeowners who were targeted by scammers, I can tell you that deed theft and scams have become disturbingly commonplace. These scams often prey on homeowners struggling to retain their homes, and include deceptive and unfair practices such as partition scams, mortgage modification rescue scams, short-sale fraud, and even scams related to the estate administration of deceased homeowners, where scammers try to steal family homes immediately before they can be handed down to the next generation.

In my office alone, a large percentage of our cases involve homeowners who have fallen victim to deed theft. These scams are no longer isolated incidents, but a regular and growing threat to the existence and preservation of affordable housing in our City. Thankfully, recent media coverage has highlighted the rise of these fraudulent schemes, but the reality is that the

Demand Justice.

scams continue to proliferate, leaving countless homeowners vulnerable and without recourse. And recent state legislation provide additional tools to both law enforcement and advocates seeking redress for these scams, but those legislative tools do not *prevent* those scams from occurring—for that, only organizations such as ours working directly with distressed homeowners can prevent struggling homeowners from falling prey to the myriad scammers looking to trick vulnerable homeowners out of title to their homes and looking to strip equity from our neighborhoods.

For example, one of our clients in Brownstone Brooklyn, a senior, lived in and owned the home that her parents had purchased decades ago. However, when her absent brother, who was also named on the deed, passed away, scammers somehow located one of his heirs who was desperate for money and offered her a fraction of her alleged shares' worth. Now the scammers are attempting to force a sale of my client's home.

Sadly, at the heart of every one of these scams are unfair business practices, deception, misrepresentation, and intimidation—designed to rob families of their homes, their equity, and their legacy. Even with the enactment of the new deed theft law one year ago, criminal prosecutions are exceedingly rare as law enforcement institutions remain reluctant to prosecute deed thefts. Instead of supporting victims, the system all too often facilitates the transfer of property, leaving homeowners without any meaningful path to recovery.

And these scammers don't just target anyone—they focus on the most vulnerable New Yorkers. Immigrant communities, seniors, and Black and brown homeowners, who have already been victimized by redlining and predatory lending, now face the threat of losing their homes to these criminals. As property values skyrocket in gentrifying neighborhoods, scammers increasingly see these homeowners as prime targets—especially the elderly, disabled, and financially distressed.

The truth is, many of our clients come to us with limited resources and no clear path to recovery. They are often behind on mortgage payments, property taxes, water bills and other utilities, and in many cases, their financial instability makes them sitting ducks for fraudsters.

The Inclusion of Residential Properties In The Tax Lien Sale Exacerbates Deed Thefts

Unfortunately, one practice that has significantly exacerbated the problem of deed theft in New York City is the tax lien sale, which this Council recently reauthorized through 2028—the longest reauthorization period in recent memory. When New York City holds a tax lien sale, it publishes a list of properties with unpaid property taxes, water and sewer charges, and other property-related charges that are at risk of being sold to recover those debts. While the tax lien sale is framed as a necessary measure to collect unpaid revenues, it has unintended consequences for homeowners, especially those already facing financial hardship.

Regrettably, the public nature of the tax lien sale list makes these homeowners prime targets for scammers. Unsurprisingly, in a recent deposition conducted by my office of a

fraudster in a partition action, the scammer actually admitted that he regularly uses the tax lien sale list to identify properties to target. Indeed, in many ways, the tax lien list is essentially the “White Pages” of vulnerable New Yorkers, published by New York City and placed in the hands of fraudsters.

The problem could be alleviated were the City Council to remove 1-4 family residential properties from the tax lien sale. By doing so, the City Council would help preserve homeownership for families in need and also protect homeowners who are most at risk and reduce the likelihood that they will fall victim to fraud. More importantly, it would send a clear message that the City is committed to prioritizing the protection of its most vulnerable residents.

Need for Increased Funding for Legal Services and Housing Counseling

However, it cannot be overstated that homeowners facing deed theft scams need dedicated, professional advocates who can provide the legal support and guidance they need to protect their properties and to *prevent* these frauds in the first place. Attorneys and housing counselors are essential to this effort, whether by providing critical information to prevent future scams, offering assistance to resolve mortgage and property tax arrears, or representing homeowners in litigation against fraudsters.

Advocates funded by the Attorney General’s Homeowner Protection Program (HOPP) are often the first line of defense against deed theft. Unfortunately, many homeowners only connect with trusted, free legal services after it's too late. For those who do manage to reach an attorney or counselor in time, the impact can be life-changing.

Making HOPP funding permanent in the New York State budget—not as a vulnerable line item subject to political shifts or budget shortfalls—would be tremendously impactful in supporting deed theft *prevention*. Ensuring stable funding for this work, and making sure it is increased so that legal services and housing counseling are available to those who need them most, and so that vulnerable homeowners are not left with scammers as their only source of help, would be the most impactful thing that the State could do to address this issue. Additionally, targeted funding for the most intractable cases would benefit both those impacted directly and the surrounding communities impacted when homes are lost to gentrifying investors.

Sadly, my office has also encountered cases where even attorneys have preyed on vulnerable victims of deed theft scams. For example, we are currently litigating a case where our client’s late partner was a victim of deed theft. This individual was one of the rare homeowners who had his home returned through a federal law enforcement prosecution. However, before that happened, he had sought help from an attorney who presented himself as a savior, promising to intervene and save the generational family home for my client’s partner and his family. Even though it was the federal government that successfully returned the home, and in reality the attorney did very little work, that attorney is now attempting to enforce a 25% contingency fee agreement and force the sale of the very home he promised to save, in order to pay himself. While this may be an isolated incident, it underscores the dangers of vulnerable individuals

trusting the wrong people. This highlights exactly why we need more accessible, free legal services—services made possible through HOPP.

Furthermore, we need to do more to publicize HOPP and ensure that struggling homeowners can access these resources before it's too late. Every day we delay, more families are at risk of losing their homes. By investing in the HOPP network, we invest in the protection of our most vulnerable communities—and take real steps toward curbing the tide of deed theft and fraud.

Legislative Measures to Combat Deed Theft – The Consumer and Small Business Protection Act

Aside from increasing funding for advocates and housing counselors, the legislature has considered several measures that can help curb deed theft scams, most notably the Consumer and Small Business Protection Act (“CSPA”), which was introduced as Senate Bill S795A and Assembly Bill A7138 during the 2023-24 legislative session.

CSPA, among other things, would expand General Business Law 349's existing prohibition of deceptive conduct to include unfair and abusive conduct. New York's Deceptive Practices Act is an outlier in this country because it fails to prohibit unfair and abusive conduct and has only weak penalties for the conduct that it does prohibit, compared to similar statutes enacted in most other states. Because scammers' strategies are always evolving, having a strong general consumer protection statute could permit many homeowners to seek redress in the courts who currently lack the ability to do so. The absence of this tool, which is available in 43 other jurisdictions, significantly hinders the work of advocates and law enforcement seeking redress for homeowner victims of deed theft and other real property crimes.

The many forms deed theft scams can take—including those that we have not yet seen—make it exceedingly difficult to design a specific legislative solution. Yet, all are likely to involve unfair and abusive conduct—conduct that, under present law, is not unlawful under New York's consumer protection law. Having a consumer protection statute that does not lag behind those of 43 other states would give advocates and law enforcement the necessary tools to seek redress against the ever-evolving scams preying on New York homeowners.

Conclusion

I would like to thank the City Council for soliciting input from the community and from advocates like us as you grapple with solutions to the pervasive and devastating problem of deed theft scams. Homeowners like my clients deserve secure, affordable housing, and protection against scammers bent on stripping the equity from homes, defrauding homeowners into signing away title to their family homes, or forcing the sale of homes that deceased New Yorkers thought they had preserved for their heirs. Every home lost to a scammer represents equity stripped from the community, generational wealth creation reversed as if it had never happened, the

displacement of longstanding community members, and the loss of affordable housing going forward.

Deed theft and property fraud are not just isolated incidents, but part of a much larger crisis that is affecting the most marginalized members of our city. We have an opportunity, right now, to protect these homeowners, prevent further scams, and create a legal infrastructure that holds scammers accountable, while simultaneously fulfilling our obligation to ensure that our justice system does justice for all New Yorkers, not just those with the means to hire a private attorney. By ensuring permanent, dedicated funding for HOPP and expanding its reach, we can make a real difference in the lives of those who need it most.

Thank you for your attention today.

Randi Scherman
Senior Staff Attorney
Brooklyn Legal Services, Neighborhood Economic Justice Project
Legal Services NYC

Testimony by The Legal Aid Society

**Before The New York City Council Committees on Aging, Consumer and Worker Protection,
and Housing**

**Int 0888-2024: A Local Law to amend the administrative code of the city of New York, in
relation to requiring disclosures of market value for unsolicited officers to purchase residential
properties**

**Int 0901-2024: A Local Law to amend the administrative code of the city of New York, in
relation to requiring the office of financial empowerment to provide assistance to homeowners**

November 19, 2024

Founded in 1876, The Legal Aid Society is the oldest and largest provider of free direct legal services to low-income families and individuals in the United States. Operating from 26 locations in New York City with a full-time staff of over 1,900, the Society handles more than 300,000 individual cases and legal matters each year. The Society's law reform representation for clients also benefits some two million low-income families and individual in New York City through impact litigation addressing a broad range of housing and benefit issues.

The Legal Aid Society has been at the forefront of advocating for the rights of homeowners at the City, State, and local levels since 2000 through our Foreclosure Prevention and Home Equity Preservation Project. Our mission is to preserve affordable homeownership, prevent foreclosures, and challenge abusive lending and real estate practices in state and federal court.

We appreciate the opportunity to testify today on the critical issue of deed theft and strengthening protections for homeowners against predatory real estate speculation. Real estate predation is nothing new, particularly in New York City where the cost of rent and homeownership have skyrocketed in the last decade and are at an all-time high. The allure of flipping a property in our city has never been greater, increasing the threats to long-term homeownership and the very fabric of our communities. As such, we applaud Council Members Hudson, Brewer, Hanif,

Justice in Every Borough.

Williams, Riley, Restler, Brennan, and Gutiérrez on Int. 888-2024 and 901-2024 for seeking to further protect homeowners from predatory investor practices.

We turn first to Int 888-2024, which seeks to require disclosures of market value for unsolicited offers to purchase residential properties and ties in well with New York State's recently enacted Heirs Property Protection and Deed Theft Prevention Act of 2024 ("Heirs Property Act"). The Heirs Property Act added protections to homeowners by first providing co-tenants, or more commonly, heirs of a deceased title holder, the right of first refusal and opportunity for remaining co-tenants to purchase that interest on the same terms offered by a purchaser. The Heirs Property Act went further by placing a duty on any potential buyer and the co-tenant who received the offer to identify all co-tenants and notify them of the pending offer so that they may exercise the right of first refusal.

Unfortunately, in our practice, we have seen many heirs of properties being induced by predatory investors to sell their interest for a fraction of its worth. In one such instance, an investor purchased a one-third interest in a two-unit building from an heir for \$10,000.00, brought a partition action against the remaining heirs and was thereby able to force a court-ordered sale of the home for \$630,000.00. This latter example occurred before the enactment of more recent homeowner protections, most notably the Uniform Partition of Heirs Property Act, enacted in 2019 under Section 993 of the Real Property Actions and Proceedings Law (RPAPL) and the Heirs Property Act, which combined, would have barred the investor from commencing the partition.

Int 888-2024 would be an important step to allow potential heirs or co-owners to make better-informed decisions when it comes to selling their very valuable property rights. However, given the ever-increasing value of New York City real estate, the penalties of \$250 for a first violation and not less than \$500 for a subsequent violation fall short of deterring real estate investors. As a point of comparison, a family seeking to administer the estate for a title holder of real property valued more than \$500,000.00 in New York State must pay a filing fee in Surrogate's Court of \$1,250.00. This does not include any other court fees or attorneys' fees to assemble the complicated paperwork necessary to make such filing.

Lastly, we turn to 901-2024, a bill requiring the office of financial empowerment to provide assistance to homeowners in the form of outreach and education on asset protection. The bill provides that the department's financial education providers and office of the homeowner advocate

will provide support to homeowners and their heirs on topics such as scam prevention, mortgage counseling, municipal payment assistance, repair financing, financial planning and estate planning.

In our work with homeowners and heirs, we believe education and outreach for homeowners is critical and laud the council members' interest in pursuing this need. However, one of the most significant tools to combat deed theft in New York is the Homeowner Protection Program (HOPP) network, administered by the Attorney General's office, which provides homeowners with access to free legal and counseling services throughout the state. Members of the HOPP network in New York City include, among other, The Legal Aid Society, Legal Services of NYC, NYLAG, Brooklyn Corp A, and the City Bar Justice Center. Our members routinely gather to discuss emerging trends and fight predatory practices against homeowners. Often, as the sole resource available to low-income New Yorkers, our members have a unique and deep understanding of the intersection of scam prevention, mortgage payment assistance, repair financing, estate planning, and the obstacles low-income homeowners in particular face with addressing these challenges. We strongly encourage the council members to consider strengthening the relationship between the Office of Financial Empowerment and members of the HOPP network to more quickly connect homeowners with assistance.

We hope to continue the dialogue with the City Council toward protecting our communities of low-income homeowners.

We thank you for the opportunity to testify today.

Respectfully submitted by

Casey Lee

Staff Attorney

Foreclosure Prevention and Home Equity Preservation Project



November 20, 2024

Dear Chairs Hudson and Menin, members of the Committees on Aging and Consumer and Worker protection, and staff,

Thank you so much for yesterday's hearing focusing on deed fraud and protections for vulnerable families' property. We believe there are key measures the City can take now to expand access to legal services in this key area:

1. Create a Tangled Title Fund modeled on Philadelphia's.
The City of Philadelphia supports this program through its Division of Housing and Community Development. An independent Advisory Committee oversees the fund, which is administered through a non-profit called Philadelphia VIP. The fund provides up to \$4,000 each for qualified homeowners to cover administrative, legal, and other costs that may arise in resolving a homeownership issue. We are glad the Council has incorporated resources for untangling title in its Estate Planning Initiative, but the required funding to make this work at scale is much more than provided so far.
2. Increase funding for community lawyers generally.
In addition to the Tangled Title Fund work, local legal services organizations provide educational outreach, workshops, and other critical legal support. They are an important line of defense against these scammers, and we must prioritize them in FY 2026 budget negotiations.

The Council can also pass legislation to expand outreach and education. Bills heard yesterday will help accomplish this. Another important bill, which we helped draft, was referred to the Finance Committee and have not yet been heard this session:

· Intro 782, sponsored by Council Member Nurse, would require DOF to send information with property tax bills, including availability of exemptions such as SCRIE and DRIE; and about how to register for the ACRIS Alert system so they will receive an alert when deeds, mortgages, and other documents are recorded against their property.

We look forward to seeing the full package of bills becoming law as soon as practicable; each delay puts more families at risk of losing their most valuable assets.

Thank you so much for all you do,

The Abolish the Tax Lien Sale Coalition

Endorsers:

Members:

Community Service Society of New York
East New York Community Land Trust
New Economy Project

NYC Communities for Change
New York Civil Liberties Union
The Center for NYC Neighborhoods

TakeRoot Justice

Western Queens CLT

Brooklyn Level Up

Bronx CLT

Northwest Bronx Community and Clergy Coalition

Coalition for Community Advancement

NYCCLI

MHANY Management Inc.

**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: Jake Capistrano

Address: _____

I represent: DOF

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/19/24

(PLEASE PRINT)

Name: KAREN GREENBERG

Address: _____

I represent: Black / Brown Americans

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Rachel Green

Address: _____

I represent: _____

Address: _____

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

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THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 12/19/2024

(PLEASE PRINT)

Name: Beverly Smith

Address: [redacted] Poptham AVE Bx NY 10453

I represent: Poptham Gardens HOA

Address: [redacted] Poptham AVE Bx NY 10453

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THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Roger Rowe

Address: [redacted] Amityville NY 11781

I represent: _____

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Casey Lee

Address: 260 E 161st St, 8th Fl, Bronx, NY 10451

I represent: The Legal Aid Society

Address: _____

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Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/19/2024

(PLEASE PRINT)

Name: VIRA Jones

Address: _____ Brooklyn

I represent: VIRA Jones 11238

Address: _____ Brooklyn

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/19/24

(PLEASE PRINT)

Name: Penney Vachirapapun

Address: 2 Lafayette Street

I represent: NYC Aging

Address: _____

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Appearance Card

I intend to appear and speak on Int. No. T2024-2681 Res. No. 2682

in favor in opposition

Date: 11/19/24

(PLEASE PRINT)

Name: Randi Scherman

Address: 29 Albany Avenue, 2nd Floor, Brooklyn, NY

I represent: Legal Services NYC / Brooklyn Legal services

Address: _____

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Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jenny Weyel

Address: [REDACTED] Brooklyn

I represent: HPD

Address: 100 Gold St

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

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Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Collette McCain

Address: _____

I represent: DOF HPD

Address: _____

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Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Carlos Ortiz

Address: _____

I represent: DCWP

Address: _____



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Appearance Card

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I intend to appear and speak on Int. No. 888, 901 Res. No. _____
 in favor in opposition

Date: 11/19

(PLEASE PRINT)

Name: Jenny Hovel

Address: _____

I represent: HPD

Address: 100 60th Street



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