



**NEW YORK CITY COUNCIL
COMMITTEE ON PUBLIC SAFETY
COMMITTEE ON OVERSIGHT AND INVESTIGATION**

**TESTIMONY OF PHILIP K. EURE
INSPECTOR GENERAL FOR THE NYPD
NEW YORK CITY DEPARTMENT OF INVESTIGATION**

EXAMINING THE OFFICE OF INSPECTOR GENERAL FOR THE NYPD

NOVEMBER 15, 2017

Good afternoon Chairpersons Gibson and Gentile and committee members. I am Philip Eure, The Department of Investigation's Inspector General for the New York City Police Department. Thank you for giving me the opportunity to testify today. I am eager to tell you about the work that we have been engaged in for the last four years, its impact on the policies and practices of NYPD, and how we have helped New York City continue to be a national leader in the field of police accountability.

In many ways, with the passage of Local Law 70 in 2013, the members present here today are responsible for having established a model of police oversight and accountability, while cementing a commitment to constitutional policing and public safety for all New Yorkers. That legislation was based on a simple premise that remains relevant today: in a City as diverse as New York, with a police department as large as NYPD, vigorous external review is needed to ensure that the police keep the city safe while remaining responsive to community concerns.

The IG's mission is to enhance the effectiveness of the police department, increase public safety, protect civil liberties and civil rights, and increase the public's confidence in the police force, thereby building stronger police-community relations. We believe that we have made important strides towards accomplishing all of these goals in the last four years, and we look forward to continuing to build upon that work in the years to come.

When we first set out to build this unit following my appointment by Commissioner Peters in March 2014, it was clear that success would be rooted in a diverse set of skills: our multidisciplinary staff has a range of professional experiences, including attorneys, investigators, auditors, police oversight specialists, former law enforcement, criminal justice researchers, policy analysts, and others.

We have learned about many issues through our continual outreach work, in which we have had meetings with a variety of community groups, advocates, and local organizations focused on criminal justice reform. Our office has presented before precinct community councils and grassroots

organizations, and we have ongoing meetings and briefings with high-ranking NYPD officials, police union representatives, and individual officers themselves.

In the past three years, we have also produced nine reports that have examined a number of critical policing issues. From our very first report, on officers' use of chokeholds and the frequent lack of resulting discipline, to our most recent report on U-visa certifications issued to undocumented immigrant victims of crime, we have been grounded in the reality that policing in New York City is complicated and urgent. But protecting individuals' rights and fostering public confidence must also be at the core of NYPD's goals.

The other topics we have investigated include: surveillance of political activity; use of force policies and practices; the use of body cameras; the relationship between quality of life policing and felony crime in New York City; the use of data from lawsuits to improve the performance of both individual officers and the Department overall; inefficiencies in how NYPD investigates

public complaints; and NYPD's approach to dealing with people in mental crisis.

Approximately eight months after this office published its first report on use of force by NYPD, the Department released a set of revised policies that more precisely define the use of force, as well as a more detailed tracking form. All uniformed members of the Department are now required to use a "Threat, Resistance, or Injury Form" (TRI) whenever they use force or witness another officer using force at the scene. NYPD uses the data from these TRIs in publically reporting about the Department's use of force, as is now required due to legislation passed by City Council last year. As a result, the public has access to data it never did before: previously, NYPD's release of use of force data to the public was intermittent and *ad hoc*. This information is vital to assessing and improving tactics, training, policies, supervision, and discipline involving the use of force by police. Accurate and detailed reporting on police use of force also impacts public confidence in the police by providing greater clarity on why officers use force. We will soon release the results of our follow up investigation into NYPD's compliance with the new TRI mandate.

In 2016, we published another significant report: it was the first independent, data-driven investigation into the relationship, over time, of what is known as quality-of-life enforcement and felony crime. Our team analyzed over 1.8 million quality-of-life summonses, 650,000 quality-of-life misdemeanor arrests, 600,000 felony complaints, and 200,000 felony arrests over six years. We found that between 2010 and 2015 there was a dramatic decline in quality-of-life enforcement with *no* increase in felony crime. In fact, felony crime, with a few exceptions, declined along with quality-of-life enforcement. Furthermore, we found that quality-of-life enforcement was not evenly distributed across the City: instead, in 2015, it was concentrated in precincts with high proportions of black and Hispanic residents, New York City Housing Authority (NYCHA) residents, and males aged 15-20.

Later in 2016, we released another well-recognized report, this time on NYPD's compliance with court-mandated rules, known as the *Handschu* guidelines, for surveilling political activity. The investigation found that NYPD, while able to articulate a valid basis for *commencing* investigations into political activity, was often non-compliant with a number of the rules

governing the *conduct* of these investigations. A federal judge from the Southern District of New York recognized the significance of this investigation when he cited our report in rejecting a proposed settlement from NYPD and other parties regarding police conduct going forward.

That federal judge noted, the report “describes a near-systemic failure on the part of the NYPD to comply,” and that “[i]t is incumbent upon me to consider the Report, as relevant to, and inconsistent with, the NYPD’s repeated contention that it always complies with the *Handschu* Guidelines.” As a result of the judge’s reading of our report on NYPD’s surveillance tactics, the parties’ proposed settlement in the *Handschu* case was revised to include a stronger role for its Civilian Representative in the surveillance decision-making process.

In addition to these large-scale changes, we often see significant, on-the-ground changes during the course of our investigations and as the result of our work. For instance, this past summer, we released a report concerning the Department’s process for certifying applications for U-visas: special visas

granted to undocumented immigrants who are victims of crimes and who also help law enforcement investigate and prosecute those crimes. As undocumented victims of crimes, these applicants are among the most vulnerable members of our community.

As noted in its public response to our report, NYPD now provides applicants with greater information about why an application was denied and provides more instructions on what recourse the applicant can take. As a result of changes like these, the hundreds of people who now apply for a U-visa every year with the Department will have an improved experience with NYPD.

In addition to our substantive reports, every year in our Annual Report, we describe which recommendations NYPD has implemented or moved forward on and those it has decided not to adopt. Follow up on these issues both by DOI and this Council is critical.

For example, in our report on crisis intervention training, we recommended that NYPD begin working towards a dispatch system in which the officers trained in crisis intervention are those who are sent to mental crisis incidents. We also recommended that NYPD substantially revise one of its current forms or develop a new permanent form to capture more useful data about mental crisis incidents. This analysis should be done in order to measure the extent to which CIT skills and policies are being used and followed by officers, to assess the need to revise the content of the Department's CIT curriculum and policies, and to identify the most prevalent mental health conditions in the City.

By conducting fact-driven investigations, listening to the public's concerns, issuing sound recommendations, promoting accountability and transparency, and fulfilling the mission of Local Law 70, our goal is to help NYPD do an even better job. By doing a better job, improved police-community relations, increased confidence in the police force, and enhanced public safety-- in short, real police reform--can be expected to follow. We encourage members of the City Council to continue to engage with us, as we

continue to bring New York City to the forefront of effective independent police review.

Thank you.



**NEW YORK CITY COUNCIL
COMMITTEE ON PUBLIC SAFETY
COMMITTEE ON OVERSIGHT AND INVESTIGATION**

**TESTIMONY OF MARK G. PETERS
COMMISSIONER
NEW YORK CITY DEPARTMENT OF INVESTIGATION**

**EXAMINING THE OFFICE OF INSPECTOR GENERAL FOR THE NYPD
NOVEMBER 15, 2017**

Good afternoon Chair Gibson and members of the Committee on Public Safety, and Chair Gentile and members of the Committee on Oversight and Investigation. I am Mark Peters, Commissioner of the New York City Department of Investigation (“DOI”). Thank you for the opportunity to address the committees and provide an update on the work of DOI’s Office of the Inspector General for the NYPD over the past four years, and highlight many of its successes.

It’s fitting that DOI provide its first comprehensive public briefing on the work and impact of its Police Inspector General before this committee, the driving force that pushed to pass Local Law 70 in 2013, and mandated independent oversight of the New York City Police Department (“NYPD”) for the very first time.

Local Law 70 required that as Commissioner of DOI, I appoint an Inspector General to “investigate, review, study, audit and make recommendations relating to the operations, policies, programs and practices of NYPD.”

Our mission, consistent with the guiding principles of the law, as well as our overarching mandate under the charter to serve as the Inspector General for all City agencies, is to “enhance the effectiveness of the police department, increase public safety, protect civil liberties and civil rights, and increase the public’s confidence in the police force, thereby building stronger police-community relations.” I am joined here today by Philip Eure, who I appointed in 2014 as DOI’s Inspector General for the NYPD, to lead the charge in our efforts.

I commend the Council's foresight and collective wisdom with which you crafted Local Law 70, ensuring that the Inspector General's office was situated within the DOI framework, which has been instrumental in conducting our oversight of the NYPD.

In particular, the statutory powers that imbue DOI with independence, gives us authority to issue subpoenas and have complete, unfettered access to all government documents, workers and information; to arrest those who we believe have committed crimes; to see across all government agencies; and to insist upon systemic changes to improve the way the City runs. These powers have ensured that we are able to carry out our investigations of the policies and practices of the NYPD, which is an unprecedented feat that would have been nearly impossible outside of DOI.

For example: our investigation of the NYPD's compliance with the court-mandated rules known as the Handschu Guidelines, which govern the investigation of religious and political groups and activity, would have been hindered significantly if the Police Inspector General did not have the powers that DOI, as a law enforcement agency, provides its Inspectors General to access and review sensitive and highly confidential intelligence documents that are only available to law enforcement.

Further, the creation of any new Inspector General's office is a challenge—from hiring a talented staff with a broad range of investigative skills, to setting protocols for production of documents and information and ensuring cooperation with those protocols, to crafting procedures for the conduct, scope and subjects of investigations.

Establishing and enforcing these protocols and procedures with an institution as large as the NYPD would be impossible without the counterbalancing institutional power and weight of the Department of Investigation.

In accordance with Local Law 70, the Inspector General publishes written, publicly-available reports for any investigation, review, study, or audit it completes. The NYPD Police Commissioner is required to submit a written response to each published report within 90 days, which are made publicly available and can be accessed on the DOI website.

In its first four years, the Inspector General has been able to build an impressive collection of critical analyses of policing in the City. These include assessment of NYPD's handling of U-Visa certification requests by immigrants to ensure we all as a city are doing everything we can to push back against horrific national policies; review of NYPD's use of force in New York City, which resulted in the Department's first ever agreement to track force; and an assessment of NYPD's Body-Worn Cameras pilot program, which focused on a review of activation, policy compliance, access to footage, and retention.

This deep dive analysis of a range of critical policing issues have resulted in recommendations, many of which have been accepted by NYPD and which will further protect the rights of New Yorkers, all while improving NYPD's accountability and efficiency. IG Phil Eure will provide a more detailed update on the work of his team momentarily.

Going forward, in addition to new investigations, DOI will also consistently monitor the adoption and implementation by the NYPD of our recommendations for operational reform and preventive measures, as it relates to their policies and practices.

This monitoring is particularly important because it will allow the City Council to support our efforts by holding the NYPD accountable for implementing our recommendations, which will lead to improvements in the way they do business, and protect the civil liberties and rights of all New Yorkers.

As public officials, you have an opportunity and the authority afforded to you as members of the Council, to demonstrate your commitment to increased police accountability and ensure that the important reforms we propose become reality.

I thank you for your continued support and interest in the work of DOI's Inspector General for the NYPD.

I will now turn it over to IG Eure for a more detailed discussion on our investigative work.

After that we look forward to answering any questions you may have.



**BROOKLYN
DEFENDER
SERVICES**

TESTIMONY OF:

**Debora Silberman – Senior Trial Attorney
*BROOKLYN DEFENDER SERVICES***

Written with Jared Chausow, Senior Policy Specialist

Presented before

The New York City Council Committees on Public Safety and Oversight & Investigations

Oversight Hearing on the Office of the Inspector General for the NYPD

November 15, 2017

My name is Debora Silberman and I am a Senior Trial Attorney at Brooklyn Defender Services. BDS provides multi-disciplinary and client-centered criminal, family, and immigration defense, as well as civil legal services, social work support and advocacy, for over 30,000 clients in Brooklyn every year. I thank the Committees on Public Safety and Oversight and Investigations for holding this hearing on the Office of the Inspector General (OIG) for the New York Police Department (NYPD) and providing us with the opportunity to testify.

A number of recent high-profile corruption and misconduct scandals demonstrate continued systemic problems at the NYPD. Recent bribery allegations involving both senior leadership staff and the gun licensing division have rightly attracted a lot of media attention. Today, I will discuss additional issues that have not received as much attention, and warrant scrutiny by NYPD-OIG and the Council.

Racial Disparities in Law Enforcement

Sharp racial disparities persist in NYPD enforcement practices. Arguably the clearest evidence of this dynamic exists in marijuana possession arrest patterns. Contrary to past media reports, low-level marijuana arrests have not ended. In fact, though arrest rates have declined since their peak under Mayor Bloomberg and NYPD Commissioner Kelly, they remain dramatically higher than they were during Mayor Giuliani's first term. Low-level marijuana possession remained the NYPD's top drug arrest in 2016, and fourth most common arrest overall. From 2014 through 2016, 86% of the 60,990 of those charged with low-level marijuana possession across New York City were identified as Black and/or Latino, despite government surveys showing equal or greater marijuana use by white people. A report by the Drug Policy Alliance (DPA) found that the NYPD had arrested 362 people in West Harlem for this offense, yet only 14 in the Upper East Side, which has more than three and a half times as many residents. The report also found that people of color were far more likely to be arrested for this offense even in majority-white neighborhoods.¹ None of this is surprising to me. In my nearly seven years as a public defender, I have never represented a white person on a marijuana charge.

Importantly, 64% of U.S. residents, including a majority of Republicans, support full legalization of marijuana consumption – no arrests, no prosecution, no tickets or fines.² BDS supports DPA's campaign to legalize and sensibly regulate marijuana in New York State and we do not believe any additional investigations or reports are needed to justify this long overdue reform. However, OIG-NYPD could use marijuana arrests as a launch point to investigate racial disparities in NYPD enforcement practices generally, as they are similarly present in arrests for fare evasion, sex work, and countless other offenses.

Police Perjury, or 'Testilying'

A recent *New York Times* article begins, "A federal judge in Brooklyn has told the city to prepare for a court hearing regarding the prevalence of lying by New York City police officers and whether the New York Police Department has done too little to discipline officers who testify falsely."³ As a public defender, I can assure you that such lying is prevalent and the NYPD has made no recognizable efforts to meaningfully address it. Likewise, the imbalance of power in the criminal legal system that pressures defendants to accept plea deals rather than go to trial also enables prosecutors to provide cover for police perjury, or "testilying," by making offers that defendants all-but-cannot refuse.

¹ Harry Levine, *60,000 Jim Crow Marijuana Arrests in Mayor De Blasio's New York* (Drug Policy Alliance & Marijuana Arrest Research Project 2017), https://www.drugpolicy.org/sites/default/files/Marijuana-Arrests-NYC--Unjust-Unconstitutional--July2017_2.pdf.

² Justin McCarthy, *Record-High Support for Legalizing Marijuana Use in U.S.* GALLUP NEWS, Oct. 25, 2017, <http://news.gallup.com/poll/221018/record-high-support-legalizing-marijuana.aspx>.

³ Joseph Goldstein, *Brooklyn Judge Seeks to Examine Prevalence of Police Lying* N.Y. TIMES, Oct. 17, 2017, <https://www.nytimes.com/2017/10/17/nyregion/brooklyn-judge-police-perjury-nypd.html>.

The judge cited in the article was the highly-regarded Hon. Jack B. Weinstein of Federal District Court in Brooklyn. The case in which the judge issued this decision involved a 59 year-old bodega cashier charged with drug dealing. He had been fully strip-searched in addition to being arrested and detained before the case against him fell apart as surveillance video showed the arresting officers' account was false.

I have ample experience fighting police lying in court. As but one example, in 2014, I represented a man named Jeffrey Herring who was arrested for gun possession. (I am using his real name because his story was featured in the *New York Times* and because he has been cleared of wrongdoing, his case dismissed.) Mr. Herring insisted the gun was planted by the police and his story never wavered. After receiving a letter from the District Attorney's office on the day before a hearing with notice that one of the officers had previously been found incredible as a matter of law by a judge in Brooklyn Supreme Court, my colleague and I started to dig deeper. We discovered that the same team of arresting officers had troubling records of misconduct and false testimony relating to gun arrests with near-identical facts. They adhered to a pattern involving an apparently fictitious informant, as they did in my case. We discovered several more cases in which the same arresting officers were involved in gun possession cases that fell apart under scrutiny.

We were able to get the case against Mr. Herring dismissed and the Kings County District Attorney's office announced an investigation into the officers. Yet even after *The New York Times* reported on the apparent trend in misconduct by these officers and the trail of dismissed cases they left behind, the discredited officers remained on the force. They continued testifying as witnesses for the prosecution, still apparently adhering to the same basic pattern of perjury and evidence-tampering. A public defender with The Legal Aid Society working on another case they brought in had to learn about their unreliability through *The New York Times* article.⁴ The District Attorney's investigation had apparently ended and, as far as I know, the officers remain on the force. We believe the Brooklyn District Attorney continues to rely on them. The Council should also know that the new Gun Courts, designed to pressure faster and harsher pleas with longer jail sentences for cases involving alleged gun possession, are likely only exacerbating this phenomenon.

Of course, testilying is not limited to gun possession cases. I have fought it in countless other cases involving planted drugs, illegal searches, and other misconduct. In fact, I believe fabricated pretexts of marijuana use (i.e. by smell) and traffic infractions, which are generally difficult or impossible to disprove in court, have replaced stop-and-frisk as the primary mechanism for police searches.

⁴ Nick Pinto, *The Incredibles: Judges Said These Cops Can't Be Trusted, so Why Does the D.A. Rely on Them?*, VILLAGE VOICE, Nov. 1, 2016, <https://www.villagevoice.com/2016/11/01/the-incredibles-judges-said-these-cops-cant-be-trusted-so-why-does-the-d-a-rely-on-them/>.

Policing Communities Through So-Called “Gang” Raids

The NYPD’s enforcement actions against so-called “gangs” raise so many issues that they warrant a separate hearing by the Council, in addition to an investigation by the OIG-NYPD BDS, along with law professors, community activists, civil rights attorneys and others, signed on to a April 2017 letter on this subject written by policing expert and Brooklyn College sociology professor Alex Vitale to Philip Eure of the OIG-NYPD. The letter noted, in short:

Over the last several years, hundreds of people have been arrested and charged with state conspiracy or federal RICO violations as a result of NYPD investigations. In many cases, individuals are charged with conspiracy to commit murder or other violent crimes absent allegations of direct involvement, raising substantial concerns about arrest and prosecutions based on guilt by association rather than actual involvement in violent crimes. Media reports indicate that many of these cases are built at least in part on police monitoring of social media accounts and the creation of fake social media accounts to lure others to “befriend” them, giving police access to otherwise private information. Many of those targeted by these practices are juveniles and almost all of them are non-white. We have also become aware through press reports and Freedom of Information requests that the NYPD is using one or more databases to classify and track people as gang members. In addition, the defense bar reports that the NYPD is utilizing large data mining software such as Palantir and sharing that information with federal law enforcement agencies [almost certainly including immigration authorities]. We also understand that these investigations involve substantial electronic surveillance of people including access to CCTV data in public housing complexes, wiretaps, and possibly the use of Stingray technology. The individuals being prosecuted pursuant to these raids are facing lengthy prison sentences.

We are concerned that gang designations further alienate people who are already marginalized in society and may ultimately be counterproductive to public safety. Crucially, a previously FOILED document used by the NYPD to identify people as members of a gang included no past criminal conduct in its listed criteria, but rather their neighborhood, scars, associations and other loose categorizations. In our letter, we further ask for an investigation into how the NYPD uses its gang databases, or designations. Specifically, we asked how people are selected to be placed in the database, whether and how they may challenge it, and how it is used to direct enforcement actions, in addition to other questions. We believe the NYPD’s gang classifications are likely to be overinclusive and inaccurate, like the stop-and-frisk practices that have been found unconstitutional. However, as internal records, they have not, to my knowledge, been subjected to any judicial review.

We are particularly concerned that arbitrary or unfair gang classifications may be shared with immigration authorities. Recently, four individuals were arrested by Immigration and Customs Enforcement (ICE) at Brooklyn Criminal Court. They were appearing in court on Desk Appearance Tickets relating for misdemeanor trespass charges after police allegedly found them hanging out on a rooftop, and three had no criminal records, but ICE justified its courthouse arrests by purporting that the four were members of a gang.

Again, I ask the Council to hold a separate hearing on this crucial issue.

Arrests Outside Methadone Clinic and Needle Exchange

For many years, the NYPD has targeted areas surrounding methadone clinics and needle exchanges for enforcement and harassment. This is widely known in public health circles, and police have discussed reforms, yet aggravatingly, it persists.⁵ Often, the arrests involve deceptive buy-and-busts or other predatory tactics that sometimes result in serious charges against people who are actively and even successfully turning their lives around. Furthermore, it is impossible to know how many people have shied away from medication-assisted treatment and other widely-accepted and publicly-funded harm reduction resources due to fear of police presence. It appears that NYPD uses these resources as a tool in the so-called Drug War. Importantly, there is no evidence that prohibition policies and police intervention actually reduce drug supplies, whereas the harm reduction resources they are infringing upon have been proven to save lives.

Relatedly, the opioid epidemic has shone a spotlight on one critical but underreported impact of marijuana arrests. Research funded by the National Institute on Drug Abuse found that legally protected marijuana dispensaries were associated with reductions of 16 to 31 percent in opioid overdose deaths.⁶ By comparison, the Mayor's opioid overdose prevention initiative, HealingNYC seeks to reduce opioid deaths by 35 percent over the next 5 years, in large part through stepped up NYPD enforcement. Other experts have argued that the criminalization of marijuana led to the over-prescription and over-use of opioids and eventually the epidemic that we are struggling to address today. Simply put, marijuana seems to be a safer alternative to opioids in pain management, but criminalization undercuts that benefit.

Both the Council and the OIG should investigate the NYPD's continued execution of the Drug War and, more generally, our City's allocation of resources to reduce addiction and problematic drug use.

Thank you for your consideration of our comments. If you have any questions, please feel free to reach out to Jared Chausow in my office at 718-254-0700 ext. 382 or jchausow@bds.org.

⁵ John Knefel, *The Common Cure for Heroin Addiction is Also a Magnet for Police Harassment*, BUZZFEED, Feb. 19, 2015, available at https://www.buzzfeed.com/johnknefel/how-police-harassment-at-methadone-clinics-makes-quitting-he?utm_term=.rj94qpORg#.ekNOjm12P; see also VOCAL-NY, *Beyond Methadone: Improving Health and Empowering Patients in Opioid Treatment Programs* (2011), available at <http://www.vocal-ny.org/wp-content/uploads/2011/10/Final-Methadone-Report1.pdf>.

⁶ National Institute on Drug Abuse, *Study Links Medical Marijuana Dispensaries to Reduced Mortality From Opioid Overdose NIDA* (2016), <https://www.drugabuse.gov/news-events/nida-notes/2016/05/study-links-medical-marijuana-dispensaries-to-reduced-mortality-opioid-overdose> (last visited May 30, 2017).

**THE COUNCIL
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Name: Towaki Komatsu

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