



New York City Department of Finance

January 14th Committee on Finance Hearing Testimony

Good morning, Chair Brannan and the members of the Committee on Finance, my name is Annette Hill, and I serve as the Deputy Commissioner for Customer Operations for the New York City Department of Finance. I am also joined by our Director of Intergovernmental Affairs, Jake Capistran.

I am here today to address several pieces of legislation that fall under the Department of Finance's responsibilities.

First, Intro 782, sponsored by Council Member Nurse, would require the Department of Finance to include information regarding personal property tax exemptions with the Statement of Accounts, such as the Senior Citizens Homeowner Exemption, Disabled Homeowner Exemption, the Coop/Condo Abatement, and the Veteran's exemption. Additionally, this bill would require the Department of Finance to provide information to property owners on how to sign up to receive notifications when an action is recorded such as refinancing the mortgage, paying off the mortgage, liens, etc... against their property. Lastly, this bill would also require the Department of Finance to notify property owners when their personal exemption requires renewal.

The Department understands the desire and agrees with proactive outreach to property owners, and we implement this approach in several of our practices. Each January, the Department of Finance sends out Notices of Property Values based on the tentative assessment roll. This informs property owners of their property value and their anticipated overall tax bill. Within this notification, the Department informs the taxpayer of tax exemptions that they can apply for. Second, every recipient of an exemption receives a notice in the mail, as required by law, when their exemption is up for renewal, accompanied by instructions on how to renew. Lastly, DOF sends new property owners a welcome package with information on how to sign up for notifications, including for family members.

From the administration's perspective, we believe our current practices are the better vehicle for communicating all of this critical information. We are



careful to walk the line between communicating effectively and over burdening taxpayers with too much information.

Turning to the second bill, Intro 783, also sponsored by Councilmember Nurse, which will require the Department of Finance to record a lien in ACRIS – the system of record for the City Register – any time a property accrues more than \$5,000 in lawful debt that is over 3 years old.

Currently, the Department records liens in ACRIS only when a property is sold through the tax lien sale. For liens that have not been sold yet, meaning they have not met the qualifications for the lien sale, a property owner can view this information on DOF's online property tax system. The administration believes the current practice of recording liens is the appropriate course of action and does not support changing it. Delinquent balances appear on quarterly or semi-annual tax bills, and under Local Law 82 of 2024, we send notices to property owners with overdue balances over \$100. In addition, once the debt reaches the threshold for inclusion in a lien sale, we send repeated notices, and as part of the reforms included in Local Law 82, we will conduct intensive outreach to ensure owners are aware of their debt. Our goal is to help owners resolve their debt before liens are sold. Recording liens in ACRIS would be redundant and risk exposing homeowners' financial strain to unscrupulous actors, without providing clear additional benefits.

Intro 889, sponsored by Council Member Hudson, would require the Department of Finance to notify Council Members any time a recording is made on a property that has not had an action taken within the last 30 years. Outreach and notifications are our first line of defense against deed theft or fraud. Since 2014, the city has implemented proactive measures to combat deed theft, including an internal flagging system for properties with no activity in the last 40 years. This bill is in the spirit of the City Register's work, and we are happy to work through the legislative process with the Council.

Lastly, Intro 1086, sponsored by Council Member Williams, would require the Department of Finance to notify through mail, email, or phone any recordings



through ACRIS to interested parties within 30 days. The Department of Finance supports this practice and the bill.

These four bills pertain to some of the Department of Finance's most important services to New Yorkers. We support the goals of these proposed laws and look forward to collaborating with the bill sponsors and Council. Thank you for allowing me to testify and I am happy to take your questions.



JUMAANE D. WILLIAMS

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON FINANCE
JANUARY 14, 2025**

Good morning,

My name is Jumaane D. Williams and I am the Public Advocate for the City of New York. Thank you Chair Brannan and members of the Committee on Finance for holding this hearing, and allowing me the opportunity to provide a statement.

The pandemic exacerbated housing affordability in New York City. The rippling effects are causing further financial hardships for New Yorkers. It is certain that housing costs are increasing for everyone as the affordability crisis deepens and inflation rises. We must take precautions not to worsen this crisis.

For years, the City would sell debt for uncollected property taxes and other charges to private investors at a discount.¹ These private investors have the right to collect what homeowners would owe.² If homeowners do not pay their property taxes, water and sewer charges, and other property-related charges, their properties may be at risk of being included in a lien sale. However, due to the pandemic, tax lien sales have been on pause. The last lien sale took place in December 2021 which sold liens from 2,841 properties.³ In the current session the Council has introduced several bills that include new protections for vulnerable homeowners.

Councilmember Sandy Nurse introduced two Intros and one Reso. [Int 0782-2024](#) requires the Department of Finance (DOF) to send property owners information about available tax exemptions and abatements that they may be eligible for and [Int 0783-2024](#) requires DOF to record tax liens on the ACRIS database when the debt on such property exceeds \$5,000 over a period of three or more years. Meanwhile [Reso. No. 327-2024](#) is asking New York State to allow said tax exemptions and abatements to be applied retroactively if the homeowner is eligible. Councilmember Crystal Hudson's [Int 0889-2024](#) would require DOF to provide notification to Councilmembers of the recording of certain real estate instruments such as deed-related or mortgage-related documents that affect an interest in real property that has been held by the same party for at least 30 years. Lastly for today's hearing, Councilmember Nantasha Williams's [Int 1086-2024](#) would require the DOF to notify interested parties of the recording of certain real estate instruments by email, text message, and postal mail.

¹ <https://www.thecity.nyc/2024/04/11/lien-sale-revive-property-debt-tax/>

² <https://www.nyc.gov/site/finance/property/property-lien-sales.page>

³ <https://www.thecity.nyc/2022/01/27/tax-lien-sales-expirationb/>



JUMAANE D. WILLIAMS

I support these necessary pieces of legislation as they provide extra safeguards for deed theft and fraud, as well as assists in further educating property owners. The best way to combat our current homelessness crisis is by keeping people in their homes irrespective of whether they own or rent. It is our duty to protect all New Yorkers, but especially our most vulnerable such as our elderly. We must ensure that every homeowner knows what preventative measures to take and what economic programs and tools are available if they encounter financial hardships or are targeted by predators.

Thank you.



OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO

Brooklyn Borough President

**City Council Committee on Finance
Hearing on Intros 782-A, 783, 889, and 1086 and Reso 327
January 14, 2025**

Good morning Chair Brannan and thank you for holding this hearing today. I am here representing Brooklyn Borough President Antonio Reynoso. In November, our office testified at a joint hearing of the Committees on Consumer and Worker Protection and Aging regarding deed theft, where we encouraged the Council to hear the bills on today's agenda. Thank you Chair for acting quickly to make this hearing happen.

As was discussed at length at the November hearing, deed theft is a pressing issue in Brooklyn, especially for older adult homeowners in communities of color such as the Central and Eastern parts of the borough. Deed theft scammers target these communities through illegal tactics such as refinancing scams, equity stripping, and foreclosure bailout loans, resulting in the displacement of our neighbors and the loss of generational wealth.

Additionally, DOF and the City Council unfortunately reinstated the Tax Lien Sale last year, albeit with significant updates to help homeowners avoid having their liens sold and new options for keeping people in their homes. Still, any sale of liens to private purchasers can put property owners at risk of foreclosure and open the door for predatory actors.

For example, an [article](#) from law firm Rosenberg and Estis, P.C. titled "How Savvy Investors Can Spot Distressed Properties Before NYC's 2025 Tax Lien Sale" advises their clients to watch DOF's lists of at-risk properties in order to, "focus on prospects most likely to entertain offers as interest accumulates and deadlines loom" because, "They may be more willing to accept an offer below market value if it means avoiding runaway interest costs and the eventual transfer of their lien."

Preventing criminals and speculators from preying on vulnerable property owners requires inter-agency coordination at the City and State levels, including policy changes, increased funding for legal assistance, and expanded outreach and education. Today's hearing focuses on the latter, where the City's Department of Finance is a key partner.

The goal of all today's proposals is to ensure that homeowners have the tools and information they need to protect their homes.

- **Intro 782-A:** Every property owner gets a quarterly property tax bill from DOF. This proposal would require DOF to include important information about available exemptions – which, in addition to saving property owners money, will exempt them from the lien sale – as well as the opportunity to sign up for the ACRIS Alert system, an important tool for awareness if someone has made unauthorized changes to property documents.
- **Intro 1086:** Builds on this by requiring 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. While the ACRIS Alert system is helpful, it is important that homeowners don't have to rely on it alone to receive this important information.
- **Intro 889:** Creates a role for the City Council to assist with outreach when changes to these documents impact a long-term homeowner in their district.
- **Intro 783:** Would require DOF to record tax liens in ACRIS once the lawful debt on the property exceeds five thousand dollars past due for a period of more than three years, even when that lien continues to belong to the City and is not sold. This can alert property owners to accruing debt about which they may not be aware and help them avoid the lien sale, speculation, and foreclosure. This would be a change to current practice, where municipal debt liens are only recorded when the City sells them to a third-party trust through the process I described earlier, exposing owners to predatory actors.
- **Resolution 327:** Calls on the State to allow property tax exemption and abatement programs to apply retroactively for eligible property owners, including older adults and veterans. Property owners should not be responsible for debts accrued because they were unaware of these opportunities.

Thank you again for your attention to these important proposals. Borough President Reynoso encourages the Council to move quickly to pass them and looks forward to your continued partnership on protecting our communities from displacement.



Testimony by The Legal Aid Society
Before The New York City Council Committee on Finance
January 14, 2025

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 people, the Society handles more than 300,000 individual cases and legal matters each year. The Society's law reform work also benefits some two million low-income families and individuals in New York City through impact litigation, addressing a broad range of issues, including housing, benefits, and many others.

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 by assisting homeowners in preventing foreclosures while challenging abusive lending and real estate practices in state and federal court. Over the many years, we have assisted thousands of low-income homeowners in preventing the loss of their homes to foreclosure, including those caused by tax liens as well as predatory schemes such as deed theft. We therefore appreciate the opportunity to testify today on the critical issue of property taxes and tax liens which have adversely impacted low-income homeowners.

Based on our experience, many homeowners - in particular senior homeowners - continue to be unaware of the various property tax reductions and related programs for which they are eligible. Intro 782 would provide an important step to more timely provide homeowners with this critical information. In addition, Intro 782 might add a provision to require the Department of Finance (DOF) to provide the same information to homeowners who elect to pay their taxes in person at a DOF office. Too many times, homeowners who go to a DOF office are not given that information.

Intro 783 seeks to amend the existing law to require DOF to record on ACRIS tax liens once they exceed \$5,000 and are past due for a period of more than three years. It has been our understanding that once DOF has sold arrears for property taxes or water and sewer charges to a trust, such liens are recorded. However, we have some concerns about the recording of tax liens as

such recordings have become a road map for predatory investors and scammers. Properties with recorded tax liens are clearly identifiable as distressed properties and as such have become targets for various deed theft schemes. A good percentage of such distressed properties are heirs' properties where the original owner has passed and the heirs are dealing with succession, including probate. Such properties have become a prime target for predatory partition actions where investors seek to acquire a partial interest for pennies on the dollar only to replace heirs still living at the property. Perhaps instead of recording tax liens on ACRIS, such liens could be docketed with the County Clerk similar to how other liens and judgments are docketed.

Intro 889 would provide notification to council members of transfers of properties that were held for at least 30 years. Questionable transfers occur within much shorter periods, typically involving a transfer to an LLC. Therefore, we would suggest that any transfer to an LLC be included in such notification.

Intro 1086 seeks to further amend the notification requirements for DOF to any 'interested party' with respect to the recording of any deed-related or mortgage-related document via emails and texts. While such notification might strengthen the protection of vulnerable homeowners against unauthorized deed transfers, the definition of 'interested parties' excludes heirs who have not yet started surrogate court proceedings. It is precisely those heirs who have become a primary target of predatory transfers. At a recent training conducted by DOF on the upcoming tax lien sale, DOF made it clear that currently there is no system in place for heirs to assert their ownership interest and pay property taxes short of having commenced surrogate court proceedings. We therefore propose that the City Council address how such heirs could protect their family home. The Consumer Financial Protection Bureau (CFPB) has developed guidelines on how heirs who are not on the mortgage note can assert their rights as 'successor-in-interest.' DOF could easily adopt a similar approach.

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

Sunny Jo, Esq. (SJo@legal-aid.org) and Oda Friedheim, Esq. (OFriedheim@legal-aid.org)

The Legal Aid Society

Foreclosure Prevention and Home Equity Preservation Project



WRITTEN TESTIMONY FOR THE NEW YORK CITY COUNCIL COMMITTEE ON
FINANCE HEARING BY BROOKLYN LEGAL SERVICES CORPORATION A

January 14, 2025

Dear Chair Brannan,

My name is Tamara del Carmen and I am the Director of the Consumer & Economic Advocacy (CEA) Program at Brooklyn Legal Services Corporation A (Brooklyn A). Brooklyn A is a civil legal service provider committed to ensuring that every New Yorker has equal access to legal services to seek justice, amplify their voices, and confront systemic racism and oppression.

Our CEA program's foreclosure team provides vulnerable homeowners throughout NYC with free direct legal representation, advice, and appropriate referrals to protect home equity. Brooklyn A is one of the only legal services organizations in NYC whose foreclosure prevention practice includes complex bankruptcy cases as means to resolve the foreclosure, a strategy that is extremely effective at preventing foreclosure and allowing families to regain long-term financial stability

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.

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).

Many foreclosures are the result of predatory lending or 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.

building communities ensuring opportunity achieving justice.

Brooklyn A's foreclosure team works hard to protect New York households so they can build generational wealth and maintain housing stability. We are supportive of legislation that will help homeowners avoid predatory tactics by bad actors, such as Int-1086-2024. Fraudulent clouding of title represents a serious and growing issue in homeownership and has bled into the foreclosure realm as an additional thing to defend against. It involves the intentional filing of false or misleading claims, liens, or encumbrances against a property's title, creating confusion over rightful ownership. This tactic is often used to delay sales, coerce homeowners into unfavorable settlements, or complicate efforts to refinance or sell their homes. Such actions can lead to severe financial and emotional harm, leaving homeowners uncertain about the security of their most valuable asset.

One common way fraudulent clouding of title occurs is through the use of forged or invalid documents, including mortgage assignments, satisfactions, or lien releases. These documents may be filed without proper authority or in direct violation of legal requirements, such as the proper chain of title under New York Real Property Law ("RPL"). In many cases, these filings are executed by entities that lack any legitimate claim to the property, yet they create significant legal obstacles for homeowners seeking to assert their rights.

Another prevalent method is the recording of false liens, such as mechanics' liens or tax liens, against a property. These liens are often baseless but are used strategically to cloud the title and impede the homeowner's ability to resolve their foreclosure case. Such actions not only jeopardize the homeowner's equity but also discourage potential buyers or lenders from engaging in transactions involving the property, effectively isolating the homeowner from financial solutions.

Additionally, purposely or prematurely recording a sale contract can also cloud a title, hindering the property owner's ability to sell or refinance the property. This can occur if the original sale falls through and the recorded contract is not promptly removed from the public records.

On the foreclosure defense side, predatory practices by foreclosure rescue companies or unscrupulous loan servicers further exacerbate the problem. These entities frequently target vulnerable homeowners with promises of assistance, only to use deceptive tactics to gain control of the property. This may include persuading homeowners to sign fraudulent deeds or authorizing documents under duress, which are then recorded to create false claims on the title. These practices not only violate state and federal laws but also exploit homeowners who are already struggling to navigate complex legal and financial challenges.

Adding to this challenge is the lack of robust oversight in local recording systems. Many recording offices lack the resources to thoroughly vet documents, allowing fraudulent filings to go unnoticed until they cause harm. Inconsistent practices across jurisdictions further create opportunities for abuse, leaving homeowners and advocates with a patchwork of rules that complicate the process of clearing a clouded title. Without significant reform, these systemic gaps will continue to enable fraud and exacerbate the housing crisis for vulnerable populations.

Int-1086 offers a resource for homeowners vulnerable to title clouding scams. The bill requires the Department of Finance to notify interested parties by e-mail, text message, and postal mail when a deed-related or mortgage-related document has been recorded for the property within 30 days. This gives homeowners the opportunity to review any unfamiliar documents and file a notice of fraud if necessary, allowing them to stay ahead of bad actors and prevent legal discrepancies down the line in a foreclosure proceeding or sale. Brooklyn A consulted with Council Member Nantasha Williams, lead sponsor of this bill, in drafting this proposal and we are eager to see it passed by the City Council.

Fraudulent clouding of title undermines the integrity of legitimate home sales and the foreclosure process and creates unnecessary burdens for homeowners. At Brooklyn Legal Services Corporation A, we are committed to combating these practices by advocating for our clients, pursuing legal remedies to clear titles, and holding perpetrators accountable under the law. Protecting the sanctity of homeownership and ensuring fair treatment for vulnerable homeowners remain at the core of our mission. Our efforts extend beyond individual cases, as we continue to push for legislative and regulatory changes that address the root causes of fraudulent filings and ensure a fairer and more transparent property recording system.

Thank you for this opportunity to testify to the Finance Committee. We hope you will consider our testimony as you review this bill and we hope to see it passed into city law.

Thank you,

Tamara del Carmen

Director, Consumer & Economic Advocacy

Brooklyn Legal Services Corporation A

TAKEROOT JUSTICE

Testimony Before the New York City Council Committee on Finance Testimony on Intro 782-2024, Intro 783-2024 and Resolution 327

January 14, 2025

My name is Paula Segal. I am speaking today as Senior Staff Attorney in the Equitable Neighborhoods practice of TakeRoot Justice. TakeRoot works with grassroots groups, neighborhood organizations and community coalitions to help make sure that people of color, immigrants, and other low-income residents who have built our city are not pushed out in the name of “progress.”

We are a member of the Abolish the Tax Lien Sale Coalition. The Coalition advocates for the full abolition of the NYC lien sale for all properties in the City, and its replacement with systems that (1) preserve homeowners’ and tenants’ ability to stay in their homes, (2) promote racial equity, and (3) support community land trusts.

We are glad that the Council is hearing Council Member Sandy Nurse’s two commonsense bills to improve the Department of Finance’s processes.

Intro 782 which requires DOF to send, with every quarterly bill that is already being generated, detailed information regarding exemptions that they qualify for as well as information about how to sign up for the ACRIS alert system, which notifies them by email when changes are made to property documents. This change is urgently needed and could still be implemented in advance of the May lien sale: the bill language already calls for immediate effect; the Council could vote at the next Stated meeting, the fourth (last) quarter bills for the current fiscal year are due to go out approximately 30 days after the scheduled stated. If the Council moves fast, it will give constituents time this year to engage with both exemptions and the alert system.

The ACRIS system, inclusive of the alerts it enables, is a powerful and under-utilized tool that the Department of Finance should be using more strategically to aid property owners in being aware of risks to their ownership status. **Intro 783** would require DOF to record tax liens in ACRIS once that debt exceeds five thousand dollars past due for a period of more than three years, even when that lien continues to belong to the City and is not sold. This can alert property owners to accruing debt about which they may not be aware and help them avoid the lien sale,

speculation, and foreclosure. It will aid owners themselves, not speculators, who already have all the tools they need to find distressed property owners, including the lists of likely- distressed property owners that are published in connection with the lien sale which provide a city-wide road-map directing them to which individuals might be a good target, see <https://www.rosenberggestis.com/blog/2024/12/how-savvy-investors-can-spot-distressed-properties-before-nycs-2025-tax-lien-sale/> (attached). Recording by property in ACRIS would give owners new tools, thus leveling the playing field. The threshold for recording (\$5,000 past due three years) is drawn from the most conservative of the current lien sale eligibility criteria, see <https://www.nyc.gov/site/finance/property/property-lien-sales.page>.

Another key piece of making municipal debt fairer is to allow tax exemptions for our seniors, veterans and other low-income homeowners to be applied to past years after they are granted. The City cannot do this on its own, but Council Member Nurse's **Resolution 327**, calling on Albany to allow retroactive exemptions, is a step in the right direction. We look forward to its passage and a speedy campaign for Albany to change state law, led by the City.

We are also supportive of all efforts to reduce the opportunities for deed fraud. We thank Council Members Williams and Hudson for identifying ways the City can use its powers to do that.

Feel free to contact me with any questions:

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How Savvy Investors Can Spot Distressed Properties Before NYC's 2025 Tax Lien Sale

by [Benjamin Williams](#) | Dec 20, 2024 | [NYC Property Tax](#)

As New York City prepares for its [May 2025 tax lien sale](#), property owners with overdue taxes face growing financial pressure. For investors interested in distressed real estate, this scenario creates a strategic opportunity: the lead-up to the lien sale provides early indicators—via publicly posted lists—of which properties might be ripe for negotiation and acquisition.

Key Dates and the Lien Sale Timeline

The City's next lien sale is scheduled for May 2025. Several lists showing properties at risk will be released beforehand, with the first "90-day list" expected around February 2025. Subsequent notices at 60, 30, and 10 days before the sale will follow. By tracking these lists, investors can pinpoint properties under intense financial strain.

Rising Interest Rates on Late Taxes Compound the Pressure

Late property tax payments don't just linger—they become more expensive over time. The New York City Department of Finance (DOF) charges interest on late payments, [compounded daily](#). This means the longer a property owner waits, the more they owe in interest, creating a significant incentive for distressed owners to cut a deal sooner rather than later.

For Fiscal Year (FY) 2025 (7/1/24–6/30/25), the [late payment interest rate](#) for properties with an assessed value over \$450,000 is **16%**, up from 15% in FY'24, 14% in FY'23, 13% in FY'22, and 18% in FY'21 and many prior years. With daily compounding, owners with large, valuable properties see their debts snowball at a

daunting pace—heightening their motivation to resolve the situation before the lien sale.

Data Signals Growing Delinquencies Among High-Value Properties

Recent DOF data (as of May 3, 2024) indicate increasing delinquency rates among high-value parcels. For semi-annual filers with assessed values over \$450,000 in FY'24, the total delinquent amount reached **\$499,980,526** for parcels delinquent by \$5 or more—an **18.51% increase from FY'23**. The number of such parcels was 5,481, highlighting that even larger asset classes are feeling the squeeze.

For investors, this surge in delinquency among higher-assessed properties suggests there may be more owners of commercial, multifamily, and upscale residential properties who are grappling with rapidly increasing interest charges. With interest rates higher than ever and compounding daily, these owners face a steep financial climb, making them prime candidates for distressed sales.

How Investors Can Leverage the Lien Lists

1. Early Property Identification:

By reviewing the 90-day list in February 2025—and subsequent lists at 60, 30, and 10 days—you gain an inside track on properties in trouble. This intel helps you focus on prospects most likely to entertain offers as interest accumulates and deadlines loom.

2. Direct Owner Outreach:

Armed with knowledge of their rising interest bills and impending lien sale, you can approach owners before May 2025. They may be more willing to accept an offer below market value if it means avoiding runaway interest costs and the eventual transfer of their lien.

3. Secondary Market and Post-Sale Opportunities:

While you can't buy individual liens directly from the City, building relationships with the trust or servicer that eventually acquires the liens could open doors. Monitoring properties on the brink of foreclosure and leveraging secondary market options can pay off after the sale.

4. **Foreclosure Monitoring:**

Should a lien progress toward foreclosure, your early research gives you a competitive edge. You can act quickly, whether by negotiating with the lienholder or offering a solution to the owner before they lose the property.

Timing, Data, and Relationships Matter

With interest compounding daily at 16% for high-value properties in FY'25, distressed owners have a stronger incentive than ever to find relief. By tapping into the 90-, 60-, 30-, and 10-day lists and understanding the upward trend in delinquencies, investors can time their outreach and negotiations to secure favorable terms.

A Strategic Real Estate Ally: Rosenberg & Estis, P.C.

Navigating these opportunities successfully requires not just knowing when and where to act, but also having expert legal support. For 50 years, Rosenberg & Estis, P.C. has guided clients through New York's complex real estate transactions—from acquisitions and sales to financing, development rights transfers, leasing, and beyond. Our integrated approach, which combines transactional skill with a deep understanding of litigation and administrative frameworks, ensures that clients receive unmatched service.

We represent a wide range of clients—buyers, sellers, landlords, borrowers, lenders, developers, building owners, condo and co-op boards, and joint venturers—in transactions such as:

- Acquisitions & Sales
- Development
- Joint Ventures
- Leasing
- Financing
- Ground Leases
- Development Rights Transfers
- Opportunity Zones



Council of New York Cooperatives & Condominiums

TESTIMONY TO THE NEW YORK CITY COUNCIL COMMITTEE ON FINANCE

In Support of Intro 782-2024 and Res 327-2024

January 14, 2025

Thank you chair Brannan, and members of the committee for holding today's meeting. My name is Rebecca Poole, and I am the Director of Membership and Communication of the Council of New York Cooperatives & Condominiums. We appreciate the opportunity to submit testimony on Intro 782-2024 and Res 327-2024, which have the potential to relieve some of the pressure on cost burdened homeowners who are unaware that help is available.

The Council of New York Cooperatives & Condominiums (CNYC Inc.) is a not-for-profit membership organization providing information, education, and advocacy for housing cooperatives and condominiums. More than 170,000 New York families make their homes in CNYC member buildings, which span the entire economic spectrum and are located throughout the five boroughs. As an advocate for co-op and condo homeownership we receive far too many calls – particularly from seniors – who are finding it increasingly difficult to meet their financial obligations, but are not aware of all the incentives and abatements for which they might qualify.

Homeownership in cooperatives and condominiums, just like single family homeownership, is a long-term commitment to a chosen neighborhood and community. As neighborhoods have changed and gentrified over time, and costs have escalated, many seniors and other homeowners who have remained in their co-op and condo homes are now struggling to keep up. The ability to readily take advantage of all existing incentives, abatements, and credits is essential to their well-being. It could enable them to remain in their homes surrounded by the communities they helped build.

We applaud the City Council's efforts to ensure that condo homeowners are alerted to the availability of all existing incentives. We ask that the list of exemptions requiring notification be expanded to include Senior Citizen Homeowner Exemptions (SCHE) and Disabled Homeowner Exemptions (DHE). While we understand the logistical difficulties involved, we also respectfully request that consideration be given for providing similar information to co-ops for distribution to their shareholders, and that those shareholders (co-op homeowners) be included in the benefits that would be extended by Res 327.

After all, co-op and condo homes make up close to 99% of New York City homes priced at less than \$400,000, and 84% of those priced between \$400,000 and \$800,000. Our studies indicate that over 63% of co-ops within those lower price points are home to multiple seniors who would qualify incentives and abatements. With the increases in housing costs Intro 782 and Res 327, coupled with the inclusion of co-op homeowners could make a world of difference.

Finally, we would like to note that many shareholders and unit owners are only provided information regarding available incentives when they first purchase their shares or units. An annual notice that is delivered with the Notice of Property Value would be helpful in alerting long-term shareholders and unit owners, who may now be retired seniors, of the options available to them.

Thank you for the opportunity to express our support for the proposed legislation and our request that its scope be slightly expanded to ensure it covers all homeowners.

Please see the attached chart for more information.

CNYC's Study of Sample Co-ops in Excess of 25,000 Square Feet and the Prevalence of Senior Citizens

CNYC's study is comprised of 394 of the co-ops that contributed data to CNYC's Annual Comparative Study of Operating Costs during 2019, 2020, 2021 and 2022. The buildings in the Study are located in four of the five boroughs (Manhattan, Bronx, Brooklyn & Queens), vary in size from just over 25,000 square feet to well over 150,000 square feet, and have assessed values that run from well under \$45,000 per unit to over \$400,000 per unit. Data indicates that a portion of the senior population that are homeowners in NYC co-ops, are over 65 years old, and have verified total annual household incomes of under \$97,400 and/or under \$58,399, based on their receipt of STAR and/or SCHE funds, respectively.

Data extracted from NYC's OpenData shows that in 2025 (1) 63.71% of the 394 co-ops in our sample had at least one verified household with seniors with an annual gross household income of less than \$98,700, and (2) 48.73% had at least one verified household with seniors with an annual gross household income of less than \$58,399, placing said shareholders within AMI parameters for lower-middle-income New Yorkers. These numbers are very conservative, as they represent only seniors that receive STAR through the credit, and do not account for seniors that are unaware of the exemptions/abatements.

We request that homeowners in co-ops and condos be granted the same consideration as homeowners in single-family homes, and be able to equally access and receive notification of all available incentive/rebate/benefit programs based on individual household income levels, age, and disability status. It may make the difference between a homeowner remaining in their home, or being forced to move away from their community.

Assessed Value	# of Buildings	# of Buildings in Study w/at Least 1 Senior Receiving Enhanced STAR	% of Buildings in Study w/at Least 1 Senior Receiving Enhanced STAR through DOF	# of Seniors Receiving Enhanced STAR through DOF	% of Households Receiving Enhanced STAR through DOF
Less than \$45,000 per unit	58	53	93.10%	1,005	9.78%
Between \$45,000 and \$65,000 per unit	34	27	79.41%	260	5.46%
Between \$65,000 and \$100,000 per unit	80	51	63.75%	455	6.04%
Between \$100,000 and \$150,000 per unit	110	70	63.64%	422	4.68%
Between \$150,000 and \$200,000 per unit	52	28	53.85%	183	4.06%
Over \$200,000	60	21	35.00%	70	5.51%
ALL Buildings in the Study	394	251	63.71%	2,395	6.33%



Testimony to the New York City Council Committee on Finance for Introductions 0782-2024, 0783-2024 and Resolution 0327-2024

January 14, 2025

Good morning. My name is Jakob Kendall Schneider. I am providing testimony as a member of the Board of Directors of the East New York Community Land Trust. East New York Community Land Trust works to prevent displacement and real estate speculation in the neighborhoods of East New York and Brownsville. We do this through community organizing and providing permanently affordable housing on community-owned and democratically governed land.

We are also a founding member of the Abolish the NYC Tax Lien Sale Coalition. The Coalition advocates for the full abolition of the lien sale for all properties in the City, and replacement with systems that:

- Preserve homeowners' and tenants' ability to stay in their homes;
- Promote racial equity;
- Support community land trusts.

We appreciate the important steps that have been taken to protect homeowners and tenants from the negative impacts of the lien sale in the recently passed reauthorization. However, we also recognize that the common sense and long overdue measures included in it are but a first step to a more racially equitable system of municipal debt collection and the complete abolition of the City's racist tax lien sale. Since 2020 we have been conducting outreach to East New York and Brownsville residents living in homes that have had, or were at risk of having, liens sold on them. We've heard stories from homeowners who never received notices from the City, were unaware of exemptions they were entitled to, and had become targets of predatory real estate speculators. We also spoke with numerous tenants, including those living in absentee-owned smaller homes of 1-3 units, who told of hazardous and unsanitary living

conditions and were unaware that their landlords were not paying property taxes and other City charges, despite their paying rent regularly. The tax lien sale disproportionately impacts Black and Brown working class communities like East New York and Brownsville and we welcome the commonsense measures introduced by Council Member Nurse that will further address the racial inequity that is inherent in the lien sale which is based upon an racially inequitable property tax system.

We encourage the Committee to vote Council Member Nurse's common-sense bills out of committee and work for their swift passage in time to impact the lien sale scheduled for this spring:

- **Intro 782** will ensure that DOF gives property owners detailed information regarding exemptions they qualify for and how to sign up for the ACRIS alert system. Adding this information to property tax bills is common sense.
- **Intro 783** will require DOF to record tax liens in ACRIS once the debt exceeds \$5,000 for a period of more than three years, even if a lien is not sold. This measure provides an additional layer of notification to property owners that can help them avoid the lien sale, predatory real estate speculators, and foreclosure. It will also provide a tool for organizations to identify and offer support to distressed property owners. In effect, it will provide a more level playing field for homeowners and advocates as they fight against predatory real estate speculators. These speculators have shown that they already have the tools they need to identify distressed homeowners through publicly available data, including the tax lien sale lists and outstanding property balances. It is critical that property owners and advocates have an additional tool to counter the violence of predatory real estate speculation.

We also support **Resolution 327** which calls on the state to allow retroactive exemptions for seniors, veterans, and other low-income homeowners. Homeowners too often are unaware of exemptions they are entitled to or have missed a filing deadline. We look forward to the City leading a campaign to swiftly change state law to allow retroactive exemptions, which will make municipal debt fairer and more equitable.

We are also supportive of the bills introduced by Council Members Hudson and Williams that will reduce opportunities for deed fraud.

Thank you for working with us to help keep New Yorkers in their homes. We look forward to continuing to work together to abolish the lien sale and replace it with a racially equitable system of municipal debt collection that keeps residents in their homes and fosters stable communities.



January 17, 2025

Dear New York City Council Member Brannan and Members of the Finance Committee,

Thank you for the opportunity to provide testimony regarding legislation to help New Yorkers preserve their homes.

My name is Bonnie Mohan, and I am the Executive Director of The Health & Housing Consortium. The Health & Housing Consortium (“the Consortium”) is a collaborative network of healthcare, housing, homeless and social services organizations, and government partners with the shared goal of improving health equity and housing stability. First established in the Bronx in 2011, the Consortium unites these sectors to better serve New Yorkers in need, particularly people with unmet health and housing needs.

During the Consortium’s launch of its *Advocacy Spotlight Series*, our network had the privilege to learn from the NYC Community Land Initiative (NYCCLI) about the need for more equitable systems that protect homeowners and renters, promote racial equity, and support community land trusts. In alignment with the NYCCLI, we are pleased to **support Council Member Sandy Nurse’s proposed bills to improve the Department of Finance’s practices:**

- **Intro 782**, which requires the City to include exemption information and ARCIS alert system details in quarterly tax bills, is a simple step to help homeowners stay informed and avoid unnecessary financial burden.
- **Intro 783**, which requires the City to record tax liens to ARCIS when the debt exceeds \$5000 and is overdue for more than 3 years, will help alert homeowners to accruing debt they may not be aware of and help them avoid the lien sale and foreclosure.

We respectfully urge the Council to **pass these bills in time to reduce the number of properties headed for the May 2025 lien sale.** Additionally, **we support Council Member Nurse’s Resolution 327**, which calls on the State to allow retroactive tax exemptions for seniors, veterans and low-income homeowners.


The Consortium envisions a world where all people live healthy, fulfilling lives and experience safety and holistic wellbeing in the housing and communities of their choice, with the support they need to thrive. While the above bills are a step in the right direction, **we also call for the full abolition of the tax lien sale** and the enactment of systems that prioritize community stability.

Thank you for your consideration.

Sincerely,



Bonnie Mohan
Co-Founder and Executive Director
The Health & Housing Consortium, Inc.


bmohan@hhconsortium.org
www.healthandhousingconsortium.org

Good Afternoon Committee on Finance Chair Brannan and all Committee Members,

My name is Tobias Campbell. I am a member of the East New York Community Land Trust and a lifelong New Yorker.

I am here with the Abolish the Tax Lien Sale Coalition, which advocates for the full abolition of the NYC lien sale and its replacement with systems that ensure housing stability and racial equity, while promoting the community land trust model.

For any temporary financial benefit the city might see out of the sale of tax liens, we know that ultimately, this system only serves to enrich speculators and to fuel displacement. If the city cares about preserving a culturally rich and democratic New York, the tax lien sale is a kind of self-sabotage, a kind of shooting oneself in the foot. We appreciate the work the City Council has done thus far to ameliorate the tax lien sale. We're here today to call on the city council to continue that good work by passing two common sense bills, introduced by Council Member Nurse, to ensure that New Yorkers have access to important information ahead of this year's upcoming Tax Lien Sale.

Let's pass Intro 1782 so that along with the property tax bills they receive every 3 months, New York homeowners are also informed of the exemptions they qualify for and of how to get on the ACRIS alert system. **And, let's pass Intro 1783** so that ACRIS reflects any significant accruing debts that property owners might not be aware of otherwise. This way, no one will be subjected to the lien sale, speculation, and foreclosure simply due to a lack of knowledge. Making sure people have the information they are entitled to is, truly, the least we can do.

Please vote on these bills so they can become law in time to help reduce the number of properties headed to the May 2025 lien sale.

Beyond making these common sense changes, the city should abolish the tax lien sale and replace it with a system of municipal debt collection that prioritizes neighborhood stabilization. The Coalition has done incredible work in laying out such an alternative framework for municipal debt collection. And we look forward to continuing to work with the council to realize this more equitable system.

Thank you for working with us to help New Yorkers preserve their homes.

John Krinsky

[REDACTED]
New York NY 10025
[REDACTED]

Good Morning, Committee on Finance Chair Brannan and all Committee Members,

My name is John Krinsky. I am a professor of political science and public policy at the City College of New York and the CUNY Graduate Center. I am also a co-founding board member of the New York City Community Land Initiative (NYCCLI). I come here on my own behalf (NYCCLI will be submitting its own testimony) to thank you for hearing Intros 782 and 783, Council Member Nurse's two bills to improve the Department of Finance's processes. Intro 782 would require the Department of Finance to give property owners detailed information regarding exemptions that they qualify for as well as information about how to sign up for the ACRIS alert system, which notifies them by email when changes are made to property documents. Intro 783 requires DOF to record tax liens in ACRIS once that debt exceeds five thousand dollars past due for a period of more than three years, even when that lien continues to belong to the City and is not sold to a Lien Sale Trust. Property owners can then become more aware of accruing debt and help them avoid the lien sale and its attendant speculation and foreclosure. I urge you to vote on both bills so that they can be heard by the entire council and become law as soon as possible.

In addition to these changes, which are basic and sensible, I also urge you to abolish the tax lien sale as a whole. NYCCLI is a member of the Abolish the Tax Lien Sale coalition, which also—sensibly—advocates for an end to the lien sale and its replacement with a system of municipal debt collection that prioritizes neighborhood stabilization and keeping residents—both owners and renters—in their homes, with safety and security. Indeed, even prior to the formation of the coalition, going back at least to the fall of 2015—so nearly *ten years*—advocates, including some in this hearing today, began to present to City Council and the Department of Finance the case for why the tax-lien sale was damaging to communities and why it should be replaced.

I worked in the Housing Policy and Research division of the Community Service Society from 1993 to 1996, and saw the transition to the tax-lien sale from the earlier system of tax foreclosure from the perspective of efforts to forestall disinvestment and abandonment of housing. Back then, as the city and its real estate market recovered from the long crisis that began in the late 1960s, tax-delinquent properties, which had been nearly valueless, were instead becoming very valuable. Tax delinquency was understood, however, to be an early-warning sign of trouble, whether because of the more obvious financial instability of housing, or because of deeply deteriorating conditions for tenants. It was clear to us then that pooling liens and selling them as investments would make it harder for the city to build on the successes of its community-based, nonprofit housing programs that enabled some of the worst buildings to more easily enter city—and then community—ownership. The specificity of conditions would be hidden, in effect, by the focus on the value of the lien, and dissolved in the larger pool.

This was, however, Mayor Giuliani's intention; and he had willing partners in City Council's leadership (Speaker, Peter Vallone, Sr.'s former chief of staff, Joe Strasberg, led the Rent Stabilization Association, the most powerful landlord group in the city at the time). Many of the nonprofit groups that were developing housing from previously abandoned housing taken into *in rem* foreclosure also organized

tenants in rent-regulated buildings. This was, at the time, at once a *policy* fix, because Giuliani wanted to “get the city out of the housing business;” a *fiscal* fix, recognizing that the lien sale could more quickly replace at least *some* of the money lost to tax delinquency on a yearly basis; and a *political* fix, rewarding wealthy allies and punishing the neighborhood-based nonprofits in predominantly Black and Brown communities, who had enabled people in these communities to hang on in the face of abandonment, on one side, and gentrification pressures, on the other.

Having a nearly thirty-year perspective on a city policy that has persisted in the face of evidence of its racial disparities, facilitation of deed fraud, and increasing hardship on people least able to bear it, makes me proud that the Abolish the Tax Lien Sale Coalition has come up with a plan for a system to preserve homeowners’ and tenants’ ability to stay in their homes, to promote racial equity, and to do both through supporting community land trusts as a long-term affordability and stewardship mechanism.

In the meantime, however, please vote on Intros 782 and 783 so that they can become law in time to reduce the number of properties in the May 2025 lien sale. In addition, Council Member Nurse’s Resolution 327 calls on Albany to allow retroactive exemptions, which would also promote fairness, and Council Members Williams and Hudson have identified ways in which the City can use its existing powers to reduce deed fraud connected to the lien sale. We urge broad support for these efforts from this committee and from the Council at large.

Thirty years of seeing the harms the lien sale has done, and at least ten in advocating against it: It’s like screaming at a wall. But someday, it’s going to fall. That falls to you, and someday should start today.

How Savvy Investors Can Spot Distressed Properties Before NYC's 2025 Tax Lien Sale

by [Benjamin Williams](#) | Dec 20, 2024 | [NYC Property Tax](#)

As New York City prepares for its [May 2025 tax lien sale](#), property owners with overdue taxes face growing financial pressure. For investors interested in distressed real estate, this scenario creates a strategic opportunity: the lead-up to the lien sale provides early indicators—via publicly posted lists—of which properties might be ripe for negotiation and acquisition.

Key Dates and the Lien Sale Timeline

The City's next lien sale is scheduled for May 2025. Several lists showing properties at risk will be released beforehand, with the first "90-day list" expected around February 2025. Subsequent notices at 60, 30, and 10 days before the sale will follow. By tracking these lists, investors can pinpoint properties under intense financial strain.

Rising Interest Rates on Late Taxes Compound the Pressure

Late property tax payments don't just linger—they become more expensive over time. The New York City Department of Finance (DOF) charges interest on late payments, [compounded daily](#). This means the longer a property owner waits, the more they owe in interest, creating a significant incentive for distressed owners to cut a deal sooner rather than later.

For Fiscal Year (FY) 2025 (7/1/24–6/30/25), the [late payment interest rate](#) for properties with an assessed value over \$450,000 is **16%**, up from 15% in FY'24, 14% in FY'23, 13% in FY'22, and 18% in FY'21 and many prior years. With daily compounding, owners with large, valuable properties see their debts snowball at a

daunting pace—heightening their motivation to resolve the situation before the lien sale.

Data Signals Growing Delinquencies Among High-Value Properties

Recent DOF data (as of May 3, 2024) indicate increasing delinquency rates among high-value parcels. For semi-annual filers with assessed values over \$450,000 in FY'24, the total delinquent amount reached **\$499,980,526** for parcels delinquent by \$5 or more—an **18.51% increase from FY'23**. The number of such parcels was 5,481, highlighting that even larger asset classes are feeling the squeeze.

For investors, this surge in delinquency among higher-assessed properties suggests there may be more owners of commercial, multifamily, and upscale residential properties who are grappling with rapidly increasing interest charges. With interest rates higher than ever and compounding daily, these owners face a steep financial climb, making them prime candidates for distressed sales.

How Investors Can Leverage the Lien Lists

1. Early Property Identification:

By reviewing the 90-day list in February 2025—and subsequent lists at 60, 30, and 10 days—you gain an inside track on properties in trouble. This intel helps you focus on prospects most likely to entertain offers as interest accumulates and deadlines loom.

2. Direct Owner Outreach:

Armed with knowledge of their rising interest bills and impending lien sale, you can approach owners before May 2025. They may be more willing to accept an offer below market value if it means avoiding runaway interest costs and the eventual transfer of their lien.

3. Secondary Market and Post-Sale Opportunities:

While you can't buy individual liens directly from the City, building relationships with the trust or servicer that eventually acquires the liens could open doors. Monitoring properties on the brink of foreclosure and leveraging secondary market options can pay off after the sale.

4. Foreclosure Monitoring:

Should a lien progress toward foreclosure, your early research gives you a competitive edge. You can act quickly, whether by negotiating with the lienholder or offering a solution to the owner before they lose the property.

Timing, Data, and Relationships Matter

With interest compounding daily at 16% for high-value properties in FY'25, distressed owners have a stronger incentive than ever to find relief. By tapping into the 90-, 60-, 30-, and 10-day lists and understanding the upward trend in delinquencies, investors can time their outreach and negotiations to secure favorable terms.

A Strategic Real Estate Ally: Rosenberg & Estis, P.C.

Navigating these opportunities successfully requires not just knowing when and where to act, but also having expert legal support. For 50 years, Rosenberg & Estis, P.C. has guided clients through New York's complex real estate transactions—from acquisitions and sales to financing, development rights transfers, leasing, and beyond. Our integrated approach, which combines transactional skill with a deep understanding of litigation and administrative frameworks, ensures that clients receive unmatched service.

We represent a wide range of clients—buyers, sellers, landlords, borrowers, lenders, developers, building owners, condo and co-op boards, and joint venturers—in transactions such as:

- Acquisitions & Sales
- Development
- Joint Ventures
- Leasing
- Financing
- Ground Leases
- Development Rights Transfers
- Opportunity Zones

**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 Capistran

Address: Director of IGA

I represent: NYC Dept of Finance

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Annette Hill

Address: Deputy Commissioner for Customer Operations

I represent: _____

Address: NYC Dept of Finance

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1086 Res. No. _____

in favor in opposition

Date: 11/14/25

(PLEASE PRINT)

Name: Tamara del Carmen

Address: _____

I represent: Brooklyn Legal Services Corporation A

Address: 260 Broadway, Brooklyn NY 11211

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1086 Res. No. _____

in favor in opposition

Date: 1/14/25

(PLEASE PRINT)

Name: Alexander Knipendberg

Address: _____

I represent: Brooklyn Legal Services Corporation A

Address: 260 Broadway, Brooklyn NY, 11211

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1082/1083/1084/1086 Res. No. _____

in favor in opposition

(mostly)

Date: 1/14/25

(PLEASE PRINT)

Name: Sunny To

Address: 153-001 Jamaica Ave Suite 202, Jamaica NY 11432

I represent: The Legal Aid Society

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Hannah Aroushek

Address: 2966 Fulton St

I represent: East New York C.U. - Abdulhaleem Tar

Address: 2966 Fulton St

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Tobias Campbell

Address: [redacted] Prospect Place

I represent: East New York Community Land Trust

Address: 2986 Fulton St.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 1/14/24

(PLEASE PRINT)

Name: JOAN FRISKINE

Address: [redacted]

I represent: Joan Friskine

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 1/14/2025

(PLEASE PRINT)

Name: Paula Segal

Address: _____

I represent: Take Root Justice

Address: _____

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