



Monday, June 26, 2023

**STATEMENT OF DEPUTY CHIEF MICHAEL PILECKI  
NEW YORK CITY POLICE DEPARTMENT**

**BEFORE THE NEW YORK CITY COUNCIL  
COMMITTEE ON PUBLIC SAFETY  
COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE**

**COUNCIL CHAMBERS  
JUNE 26, 2023**

Good morning Chair Hanks, Chair Brooks-Powers and members of the Council. I am Deputy Chief Michael Pilecki, the Commanding Officer of the Transportation Bureau for the New York City Police Department (NYPD). I am joined here today by Deputy Chief Tania Kinsella, the Executive Officer of the Patrol Service Bureau, and Juliane Farruggia, Managing Attorney of the Legislative Affairs Unit along with our colleagues Josh Benson, Deputy Commissioner of Traffic Operations with the Department of Transportation (DOT), Marricka Scott-McFadden, Deputy Commissioner of Intergovernmental and Legislative Affairs with the Department of Social Services (DSS) and Maureen Kokeas, Director of the Office of Tax Enforcement with the Department of Finance. On behalf of Police Commissioner Keechant L. Sewell, I am here to testify before your committees on the proliferation of fraudulent and expired license plates throughout the city and the Department's efforts to combat their use.

One of the many unforeseen consequences of the pandemic was the sharp increase in the use of temporary paper license plates, particularly the plates seemingly issued by other states. The COVID lockdowns forced DMVs in every state to close for longer periods than expected. This required repeated extensions on the expiration dates of registrations and license plates, which also relaxed enforcement on paper tags. Whether due to complacency on the part of drivers, a willingness to take the risk or as a means of giving a car untraceable anonymity during violent crimes, we continue to see the sheer number of expired plates far outpacing pre-pandemic levels. Many out of state DMVs are still allowing the online registration of motor vehicles with the printing of temporary paper plates, this has unfortunately enabled a booming black market in the printing and sale of temporary license plates, leading to rampant fraud.

Any vehicle bearing one of these fraudulent plates instantly becomes undetectable to nearly every aspect of street-level enforcement, from tolls to speed and red light cameras and even parking enforcement. They become ghosts to the system and evade enforcement on a widespread scale. For example, these cars often brazenly park illegally in bike and bus lanes, in crosswalks and at hydrants, causing hazardous conditions for pedestrians, bicyclists and drivers, alike. These cars are also involved in hit and runs of both pedestrians and other motorists, leaving innocent bystanders injured and without recourse. Summonses issued to these vehicles are unenforceable and scofflaws know that, often leaving towing as the only effective countermeasure. For that reason, the Department continues to prioritize vehicles with temporary paper license plates for towing.

Despite the outbreak of fraudulent and covered plates, the Department remains undeterred in its efforts to prevent these scofflaws from continuing to plague our streets. Last year, we issued 258,000 summonses to vehicles with covered or obstructed plates, arrested nearly 4,200 drivers for forged or altered plates, and seized 7,520 cars that had fraudulent paper plates or were parked illegally while displaying a temporary paper plate. So far this year, we have already issued over 130,000 summonses to vehicles with covered or obstructed plates, arrested 1,777 drivers for forged or altered plates, and towed over 1,100 vehicles this year for obstructed or covered plates. We are also conducting educational outreach to all the auto parts stores throughout the city to ensure compliance with legislation, recently passed by Council, that prohibits the sale of plate covers.

The use of fraudulent plates goes beyond parking, speeding and toll evasion. Their use by violent recidivist criminals poses another threat to public safety. Savvy criminals have learned that ghost cars help make them ghost perpetrators. We have connected fraudulent and counterfeit paper license plates to murders and armed robberies, as well as any number of violent crimes. We have even seen the same plate fleeing the scene of separate crimes but on different cars. Of the 1,777 arrests made so far this year where the paper license plate was forged, the top charge was criminal possession of a weapon in 13 of the arrests, criminal possession of a controlled substance in 37 arrests, criminal possession of stolen property in 14 arrests, DWI/DWAI in 9 arrests and grand larceny auto in 7 arrests.

Addressing these issues is a daily focus for the NYPD and the Administration. That is why last year, Mayor Adams announced the formation of the Vehicle License Plate Working Group which joins together members from NYPD, DOT, MTA, the Port Authority, the Triborough Bridge and Tunnel Authority, State Police, the Sheriffs, and the District Attorneys for strategy sessions. The goal is to apply shared knowledge to attack the problem from every possible angle using a holistic approach to each challenge posed by flouting the license plate and registration laws.

Administration-wide focus on this wide-ranging problem, as well our collaboration with law enforcement and motor vehicle departments in other states, will continue to enable the Department to quickly and effectively identify these fraudulent plates and get these cars, and the criminals who use them, off the streets.

I would now like to turn to the bills being heard today.

**Intro. 987** would prohibit the operation of a motor vehicle bearing fraudulent or expired license plates, including fraudulent or expired temporary plates. The bill creates a civil penalty returnable to the Office of Administrative Trials and Hearings (OATH) for fraudulent plates of \$500 for the first offense and \$1,000 for any subsequent offenses, and a civil penalty for expired plates of \$300 for the first offense and \$500 for any subsequent offenses, which are higher than the penalties imposed under the state Vehicle and Traffic Law.

**Intro. 988** would prohibit the sale or distribution of fraudulent license plates, including fraudulent temporary plates. The bill creates a civil penalty returnable to OATH of not less than \$1,000 for the first violation, and not less than \$2,000 for any subsequent offense.



Monday, June 26, 2023

The Administration certainly welcomes any additional tools to combat the use of fraudulent and expired plates, especially temporary plates, and looks forward to working with the Council and the sponsors on ways we can assist in promoting this important program.

**Intro. 1011** would require officers assigned to patrol any subway station to carry flyers created by the Department of Social Services/Human Rights Administration regarding reduced fare programs offered by the city, and to distribute them to each individual who is arrested or summonsed for theft of services, trespass, criminal trespass or fare evasion. The Department supports equitable fare programs that encourage legal entry into the transit system, and looks forward to working with the Council and the sponsor on the most effective way to achieve the bill's goals.

Thank you for the opportunity to testify about these important issues, and we look forward to answering any questions you may have.



**Enforcement of Defaced, Fraudulent and Expired License Plates  
City Council Committee on Transportation and Infrastructure, jointly with  
the Committee on Public Safety**

Monday, Jun 26, 2023

Thank you to the Committees on Transportation and Infrastructure and Public Safety for convening this joint hearing on defaced, fraudulent, and expired license plates.

Last week, an 18-year-old bike rider was killed by an Amazon van without a license plate. It's [reported](#) that 25 people were killed in crashes involving cars with temporary license plates in New York City from 2021-2022, and at least ten of those plates were fraudulent. Vehicles without license plates or with ones that are defaced, fraudulent, or expired aren't just evading tolls, but putting New Yorkers at risk.

Illegal license plates are increasingly found in every corner of our city. Toll evasion costs agencies and taxpayers. Drivers speed and run red lights with impunity, and the cars are often uninsured and uninspected. It's [expected](#) that these fake license plates have already cost the city well over \$75 million dollars.

Defaced, fraudulent, and expired plates make our streets more dangerous and steal taxpayer funds and the situation will only get worse without action. As New York City implements congestion pricing, we need to ensure the state has the tools it needs to effectively collect toll revenue. If we do not address fraudulent plates, it will impede our ability to implement congestion pricing, keep our streets safe, raise revenue, and ease traffic.

It's past time to rein in an underground industry that puts New Yorkers at risk. We urge the Council and Mayor Adams to work with borough District Attorneys and city, state, and federal partners to address illegal license plates, and support the passage of Council bill Int 988 to curb the proliferation of fake license plates. Addressing fraudulent license

plates requires the involvement of multiple state leaders and agencies coming together and taking coordinated action.

Transportation Alternatives also supports the passage of Chair Brooks-Powers' bill requiring officers to distribute information about reduced fare programs to those summoned for subway fare evasion.



New York City Council Committee on Transportation and Infrastructure

June 26, 2023

Testimony of Eric McClure, Executive Director, StreetsPAC

“Ghost cars,” vehicles with fake, obscured, or illegally covered license plates, are a serious, widespread, and seemingly worsening problem in New York City. Untraceable and unreadable plates allow drivers to flout speed- and red-light cameras and electronic tolls, an issue that will only compound when congestion pricing goes into effect. As Jesse Coburn has reported in a wide-ranging investigative series for Streetsblog, the proliferation of license-plate cheating cost the MTA, the Port Authority, and New York City more than a combined \$100 million in lost toll and ticket revenue in 2022.

And that’s not the worst of it. Drivers of ghost cars have also left behind a trail of death and destruction. Isaiah Benloss, a former student of Council Member Rita Joseph, was struck in 2020 by the driver of a car with temporary New Jersey plates, and later died. The driver was never caught. Davina Afokoba, a 10-year-old constituent of City Council Transportation and Infrastructure Chair Selvena Brooks-Powers, was killed by the driver of a car with temporary Texas plates early last year. That driver received only a summons.

Sadly, Isaiah and Davina were only the tip of the iceberg. According to NYPD, more than two dozen New Yorkers were killed by drivers of cars with temporary plates over the past two years, and 40% of those plates were fake. Cars with counterfeit or unreadable plates have been used in the commission of crimes, including murders. And while, according to Coburn’s reporting, the NYPD towed 3,300 vehicles with paper plates last year, they’re barely putting a dent in the problem.

### **Int. 0987-2023 – Support**

For all the preceding reasons, we strongly support Council Member Feliz’s Intro 987, which would make it unlawful to operate a motor vehicle in New York City with a fraudulent license plate, fake temporary plate, or expired license plate. The legislation also sets a reasonable graduated fine schedule, which includes a curing period for replacing expired plates. The proposed law would not put anyone in jail, but the penalties should be substantial enough to curtail a fair amount of the illegal activity, assuming the law is adequately enforced.

### **Int. 0988-2023 – Support**

We also support Council Member Feliz’s related bill, Intro 988, which would prohibit the sale or distribution of fraudulent license plates, including fake temporary plates, by

updating Section 10-182 of the city's administrative code, which already prohibits the sale of license plate covers and sprays. The bill would also impose substantial fines, of \$1,000 for a first offense and \$2,000 for subsequent offenses, which could mount quickly for someone engaged in the business of selling fake plates.

Taken together, we believe these bills will help put a dent in the spread of fraudulent license plates, which will both make the city's streets safer and help reduce toll losses. We urge that both bills be passed by the Committee on Transportation and Infrastructure and the full Council as soon as possible.

We also strongly urge the creation of a task force that would include the NYPD, the New York City Sheriff, New York State DMV, and regional and federal transportation and law enforcement authorities to address the scourge of ghost cars. Jesse Coburn's reporting reveals that the problem is widespread and crosses many state lines, and solving it will require a coordinated and holistic effort.

### **Int. 1011-2023 – Support**

Lastly, we support Intro 1011, Chair Brooks-Powers's bill that would require police to distribute information about reduced-fare programs to persons arrested or summonsed for fare evasion. While not everyone who jumps a turnstile is doing so purely for economic reasons, the city's Fair Fares program is greatly undersubscribed, and access to half-price fares may help to encourage people to pay to ride public transit. It's certainly worth a try. We'd even support an effort to give drivers whose ghost cars are impounded information about EZ-Pass.

Statement of Steve Vaccaro, Esq.  
New York City Council  
Joint Hearing of the Transportation and Public Safety Committees  
Into 987 and Intro 988 Concerning the Display, Sale of Distribution of Fraudulent or Defaced  
Motor Vehicle License Plates

Thank you, Committee Chairs Brooks-Powers and Hanks, for the opportunity to present evidence today concerning the problem of fraudulent and defaced license plates that these two bills are needed to address.

I am an attorney representing vulnerable road users — pedestrians and cyclists — against motorists who strike them, and I am here to sound an alarm:

There has been a dramatic pullback in traffic law enforcement against dangerous driving since the pandemic, drivers know it, and increasingly drivers are turning to fraudulent or defaced license plates to evade responsibility for tolls, parking violations, and the harm they cause when they strike New Yorkers. A recent landmark investigative report by Jesse Coburn specifically focused on so-called “ghost tags” — temporary paper license plates or tags issued by car dealers not in connection with the sale of a vehicle, that cannot be traced back to any vehicle.

(The report is found at the following link: <https://www.streetsblogprojects.org/ghost-tags-index>)

Coburn learned that each year, tens of thousands of fraudulent temporary tags are issued by dozens of registered auto dealers purportedly from a location in Bridgeton, New Jersey, which is in fact an empty lot at which no business appears to be conducted. Although New Jersey law prohibits auto dealers from selling temporary tags separately from the sale of a vehicle, the enforcement is lax and it happens all the time, Coburn found.

I will present to you the story of one of my clients, Raymond Wallace of Brooklyn, who was struck by on May 8, 2023, by a driver with ghost plates that were issued by a dealership called “Direct Auto Wholesale” located at that very same vacant lot in New Jersey. The driver made an abrupt and illegal U-turn from a double parked position, he struck Mr. Wallace and sent him under the car, and Mr. Wallace was dragged half a block. Thankfully Mr. Wallace survived, but he suffered a fracture to his humerus and other injuries, causing disability, lost income, medical expenses, and other problems.

By sheer luck, NYPD officers were right there when it happened. The police report, Report No. MV-2023-020-000187 (attached), lists the driver as Mr. Joseph Yodice of Staten Island, and notes that Mr. Yodice was arrested at the scene because he did not have a valid license. Further investigation revealed that Mr. Yodice’s license was revoked for offenses including driving under the influence of alcohol. The New Jersey Motor Vehicle Commission confirmed that the temporary NJ tags that police found on Mr. Yodice’s vehicle were sold by Direct Auto Wholesale to Ms. Maria Mancuso of New Jersey, who apparently gave her vehicle with the temporary tags to the unlicensed Mr. Yodice to drive. Notably, the Vehicle Identification Number listed in the records associated with the temporary tags is *different than* the Vehicle Identification Number that the police collected from the vehicle that Mr. Yodice

was driving. In other words, these were ghost tags, disconnected from the sale of a vehicle. All of this is set forth in the attached complaint filed of Mr. Wallace in Kings County Supreme Court, Index Number 517332/2023.

I urge the counsel to pass Intro 987 and Intro 988, to stem the tide of ghost tagged vehicles flooding our New York City streets, driven recklessly and with impunity. Intro 988, which focuses on the sale of fraudulent tags, should be drafted to bring within its scope any person, whether inside or outside of New York State, who fraudulently sells a ghost tag that might foreseeably be used to commit an unlawful act in New York State, as Mr. Yodice did in this case when he drove, without a license, into and over Mr. Wallace.

Thank you.

POLICE ACCIDENT REPORT (NYC)

MV-104AN (7/11)

Precinct 020
Accident No. MV-2023-020-000187

Complaint Number 2023-020-001662

AMENDED REPORT

Accident Date: 5/8/2023, Day of Week: MONDAY, Time: 06:17, No. of Vehicles: 1, No. Injured: 1, No. Killed: 0

Vehicle 1 Driver: YODICE, JOSEPH, License ID: [REDACTED], Address: [REDACTED], City: STATEN ISLAND, State: NY, Zip: 10312

Vehicle 2 Driver: WALLACE, RAYMOND, License ID: [REDACTED], Address: [REDACTED], City: BROOKLYN, State: NY, Zip: 11213

Vehicle 1 Damage Codes: Box 1 - Point of Impact 1, Box 2 - Most Damage 2, 18

Vehicle 2 Damage Codes: Box 1 - Point of Impact 8, Box 2 - Most Damage 8

Accident Diagram: 1 REAR END, Diagram Attached on Subsequent Page

Vehicle Damage Coding: 14. UNDERCARRIAGE, 15. TRAILER, 16. OVERTURNED, 17. DEMOLISHED, 18. NO DAMAGE, 19. OTHER

Place Where Accident Occurred: WEST END AVENUE, WEST 65 STREET

Accident Description/Officer's Notes: AT TPO DRIVER OF VEHICLE 1 STATES HE WAS DRIVING NORTHBOUND ON WEST END AVENUE AND DID NOT SEE OPERATOR OF THE E SCOOTER AND DID STRIKE E SCOOTER IN THE REAR

Table with columns: A, B, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, BY, TO, 18, Names of all involved, Date of Death Only

Officer's Rank and Signature: POFF, Print Name: TIFFANY M RODRIGUEZ, Reviewing Officer: SGT CHRISTOPHE N SAINTU

**PERSONS KILLED OR INJURED IN ACCIDENT** (Letter designation of persons killed or injured must correspond with letter designation on front).

B Last Name <b>WALLACE</b>		First <b>RAYMOND</b>		M.I.	Last Name		First	M.I.	
Address [REDACTED]		Address <b>BROOKLYN NY 11213</b>		Address		Address		Address	
Date of Birth Month: <b>8</b> Day: <b>8</b> Year: <b>1977</b>		Telephone (Area Code) ( )		Date of Birth Month: Day: Year:		Telephone (Area Code) ( )		Telephone (Area Code) ( )	
Last Name		First		M.I.	Last Name		First	M.I.	
Address		Address		Address		Address		Address	
Date of Birth Month: Day: Year:		Telephone (Area Code) ( )		Date of Birth Month: Day: Year:		Telephone (Area Code) ( )		Telephone (Area Code) ( )	
Last Name		First		M.I.	Highway Dist. at Scene? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Name:		Shield No.
Address		Address		Address		Address		Address	
Date of Birth Month: Day: Year:		Telephone (Area Code) ( )		Date of Birth Month: Day: Year:		Telephone (Area Code) ( )		Telephone (Area Code) ( )	

**ENTER INSURANCE POLICY NUMBER FROM INSURANCE IDENTIFICATION CARD, EXPIRATION DATE (IN ALL CASES), AND VIN.**

Vehicle No. 1 [REDACTED] Vehicle No. 2 \_\_\_\_\_  
 Expiration Date **04/26/2024** Expiration Date \_\_\_\_\_  
 VIN \_\_\_\_\_ VIN \_\_\_\_\_

**WITNESS (Attach separate sheet, if necessary)**

Name	Address	Phone

**DUPLICATE COPY REQUIRED FOR:**

- Dept. of Motor Vehicles (if anyone is killed/injured)
- Office of Comptroller (if a City vehicle involved)
- Motor Transport Division (P.D. vehicle involved)
- Personnel Safety Unit (if a P.D. vehicle involved)
- NYC Taxi & Limousine Comm. (if a Licensed taxi or limousine involved)
- Highway Unit \_\_\_\_\_
- Other City Agency (Specify) \_\_\_\_\_

**NOTIFICATIONS:** (Enter name, address, and relationship of friend or relative notified. If aided person is unidentified, list Missing Person Squad member who was notified. In either case, give date and time of notification.)

\_\_\_\_\_

\_\_\_\_\_

<b>PROPERTY DAMAGED</b> (other than vehicles)	<b>OWNER OF PROPERTY</b> (include city agency, where applicable)		

**IF NYPD VEHICLE IS INVOLVED:**

Police Vehicle	Operator's First Name	Last Name	Rank	Shield No.	Tax ID. No.	Command
Make of Vehicle	Year	Type of Vehicle	Plate No.	Dept. Vehicle No.	Assigned To What Command	

- Equipment in Use At Time of Accident
- Siren
  - Horn
  - Turret Light
  - 4-Way Flasher
  - High-Level Warning Lights
  - Traffic Cones
  - Headlights

**ACTIONS OF POLICE VEHICLE**

- Responding to Code Signal
- Pursuing Violator
- Other (Describe) \_\_\_\_\_
- Complying with Station House Directive
- Routine Patrol

POLICE ACCIDENT REPORT (NYC)

MV-104AN (7/11)

Precinct 020
Accident No. MV-2023-020-000187

Complaint Number 2023-020-001662

AMENDED REPORT

Accident Date: 5/8/2023, Day of Week: MONDAY, Military Time: 06:17, No. of Vehicles: 1, No. Injured: 1, No. Killed: 0

VEHICLE - Driver License ID Number, Driver Name - exactly as printed on license, Address (Include Number & Street)

Date of Birth, Sex, Unlicensed, No. of Occupants, Public Property Damaged, Name - exactly as printed on registration

Address (Include Number & Street), Apt. No., Haz. Mat. Code, Released, City or Town, State, Zip Code

Plate Number, State of Reg., Vehicle Year & Make, Vehicle Type, Ins. Code

Ticket/Arrest Number(s), Violation Section(s)

Check if involved vehicle is: more than 95 inches wide, more than 34 feet long, operated with an overweight permit, operated with an overdimension permit. VEHICLE DAMAGE CODING: 1-13. SEE DIAGRAM ON RIGHT. 14. UNDERCARRIAGE 17. DEMOLISHED 15. TRAILER 18. NO DAMAGE 16. OVERTURNED 19. OTHER

VEHICLE DAMAGE CODING: 1-13. SEE DIAGRAM ON RIGHT. 14. UNDERCARRIAGE 17. DEMOLISHED 15. TRAILER 18. NO DAMAGE 16. OVERTURNED 19. OTHER

Reference Marker, Coordinates (if available), Latitude/Northing: 40.77537, Longitude/Easting: -73.98772

Place Where Accident Occurred: NEW YORK, Road on which accident occurred: WEST END AVENUE, at 1) intersecting street WEST 65 STREET

Accident Description/Officer's Notes: REVOKED LICENSE AND WAS REMOVED TO THE 20 PRECINCT.

Table with columns: 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, BY, TO, 18, Names of all involved, Date of Death Only

Officer's Rank and Signature: POF, Print Name in Full: TIFFANY M RODRIGUEZ, Tax ID No., NCIC No.: 03030, Precinct: 020, Post/Sector, Reviewing Officer: SGT CHRISTOPHE N SAINTU, Date/Time Reviewed: 05/08/2023 10:16

**PERSONS KILLED OR INJURED IN ACCIDENT** (Letter designation of persons killed or injured must correspond with letter designation on front).

Last Name _____ First _____ M.I. _____ Address _____ Date of Birth _____ Telephone (Area Code) _____ Month Day Year ( ) Last Name _____ First _____ M.I. _____ Address _____ Date of Birth _____ Telephone (Area Code) _____ Month Day Year ( ) Last Name _____ First _____ M.I. _____ Address _____ Date of Birth _____ Telephone (Area Code) _____ Month Day Year ( )	Last Name _____ First _____ M.I. _____ Address _____ Date of Birth _____ Telephone (Area Code) _____ Month Day Year ( ) Highway Dist. at Scene? <input type="checkbox"/> Yes <input type="checkbox"/> No Name: _____ Shield No. _____
--	---

**ENTER INSURANCE POLICY NUMBER FROM INSURANCE IDENTIFICATION CARD, EXPIRATION DATE (IN ALL CASES), AND VIN.**

Vehicle No. \_\_\_\_\_ Expiration Date \_\_\_\_\_  
 Vehicle No. \_\_\_\_\_ Expiration Date \_\_\_\_\_  
 VIN \_\_\_\_\_ VIN \_\_\_\_\_

**WITNESS (Attach separate sheet, if necessary)**

Name	Address	Phone

**DUPLICATE COPY REQUIRED FOR:**

<input type="checkbox"/> Dept. of Motor Vehicles (if anyone is killed/injured)	<input type="checkbox"/> Motor Transport Division (P.D. vehicle involved)	<input type="checkbox"/> NYC Taxi & Limousine Comm. (if a Licensed taxi or limousine involved)	<input type="checkbox"/> Other City Agency (Specify) _____
<input type="checkbox"/> Office of Comptroller (if a City vehicle involved)	<input type="checkbox"/> Personnel Safety Unit (if a P.D. vehicle involved)	<input type="checkbox"/> Highway Unit _____	_____

**NOTIFICATIONS:** (Enter name, address, and relationship of friend or relative notified. If aided person is unidentified, list Missing Person Squad member who was notified. In either case, give date and time of notification.)

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

PROPERTY DAMAGED (other than vehicles)	OWNER OF PROPERTY (include city agency, where applicable)

**IF NYPD VEHICLE IS INVOLVED:**

Police Vehicle	Operator's First Name	Last Name	Rank	Shield No.	Tax ID. No.	Command
Make of Vehicle	Year	Type of Vehicle	Plate No.	Dept. Vehicle No.	Assigned To What Command	

Equipment in Use At Time of Accident

Siren    Horn    Turret Light    4-Way Flasher    High-Level Warning Lights    Traffic Cones    Headlights

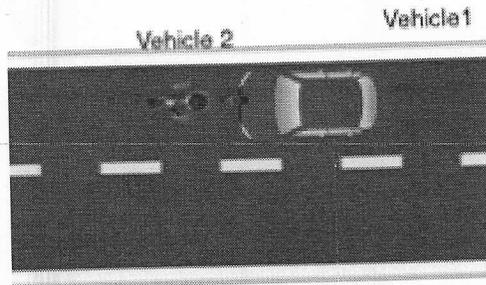
**ACTIONS OF POLICE VEHICLE**

Responding to Code Signal    Complying with Station House Directive  
 Pursuing Violator    Routine Patrol  
 Other (Describe) \_\_\_\_\_

Rear End : MV-2023-020-000187

Reporting Officer : POF TIFFANY M RODRIGUEZ

Reviewing Officer : SGT CHRISTOPHE N SAINTU Reviewed Date : 05/08/2023 10:16



SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

RAYMOND WALLACE,

Plaintiff,

-v-

JOSEPH YODICE, MARIA MANCUSO,  
DIRECT AUTO WHOLESALE, INC., &  
FRANK FALCO,

Defendants.

Index No.:

**SUMMONS**

TO THE ABOVE-NAMED DEFENDANTS:

*YOU ARE HEREBY SUMMONED* and required to serve upon plaintiff's attorney, at his address stated below, an answer to the attached complaint.

If this summons was personally served upon you in the State of New York, the answer must be served within 20 days after such service of the summons, excluding the date of service. If the summons was not personally delivered to you within the State of New York, the answer must be served within 30 days after service of the summons is complete as provided by law.

If you do not serve an answer to the attached complaint within the applicable time limitation, a judgment may be entered against you, by plaintiff, for the relief demanded in the complaint, without further notice to you.

Pursuant to CPLR Section 504(3), the action will be heard in the Supreme Court of the State of New York, in and for the County of Kings. This action is brought in the County of Kings because it is the place where the plaintiff resides: 1742 Union Street, Brooklyn, New York 11213.

Dated: New York, New York  
June 14, 2023



By:

Steve Vaccaro  
Law Office of Vaccaro & White  
*Attorneys for Plaintiff*  
150 Broadway, Suite 1703  
New York, NY 10004  
Tel. No.: (212) 577-3040

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

RAYMOND WALLACE,

Plaintiff,

-v-

JOSEPH YODICE, MARIA  
MANCUSO, DIRECT AUTO  
WHOLESALE INC., FRANK  
FALCO,

Defendants.

Index No.

**VERIFIED COMPLAINT**

**Jury Trial Demanded  
on All Counts**

Plaintiff, by counsel, the Law Office of Vaccaro & White, for a complaint states:

**Overview**

1) This action for personal injuries arises most directly from a motor vehicle collision of May 5, 2023, but also alleges negligent entrustment and other wrongful conduct by persons who knowingly equipped an unlicensed and unsafe driver with a fraudulently-issued temporary license plate, and a vehicle, with which the driver struck the plaintiff. By this action, plaintiff seeks redress against all legally-responsible parties.

**Parties**

2) Plaintiff Raymond Wallace (“Wallace”) resides in the County of Kings, State of New York.

3) Defendant Joseph Yodice (“Yodice”) resides in the County of Richmond, State of New York.

4) Defendant Maria Mancuso (“Mancuso”) resides in the State of New Jersey.

5) Defendant Direct Auto Wholesale Inc. (“Direct Auto”) is a corporate entity formed under the laws of the State of New Jersey, with its principal place of business located at 330 East Commerce Street, Bridgeton, New Jersey.

6) Defendant Frank Falco (“Falco”) resides in the County of Richmond, State of New York.

### Facts

7) The Crash. On May 8, 2023, Mancuso was the owner of a 2011 Jeep motor vehicle bearing Vehicle Identification Number VIN # [REDACTED] and New Jersey temporary license plate number [REDACTED] (the “Automobile”).

8) On May 8, 2023, at 6:17 a.m., Yodice was operating the Automobile.

9) On May 8, 2023, at 6:17a.m., contact occurred between (a) the Automobile, while it was being operated by Yodice, and (b) Wallace, who was operating an electric scooter.

10) The Harm Wallace Suffered Due to the Crash. As a result of the contact described in the immediately preceding paragraph (the “Crash”), Wallace sustained serious injuries including without limitation displaced fractures of the humerus.

11) Due to injuries sustained in the Crash, Wallace has experienced, and will experience, pre-and-post impact alarm and apprehension of physical injury, pain and suffering, loss of enjoyment of life, and mental anguish.

12) Due to injuries sustained in the Crash, Wallace has incurred, and will incur, substantial consequential damages, including without limitation (a) expenses for care and treatment of injuries; (b) disability in the performance of activities of daily life, and the consequent need to pay others to perform, and/or to forego those activities; and

(c) disability in the performance of job-related duties and consequent loss of earnings and diminution of opportunities to earn, and the loss of esteem of actual and potential clients, professional peers and others with whom plaintiff professionally interacts.

13) The Negligence of Yodice. At the time of the Crash, Yodice owed a duty to Wallace to use care in the operation, use and control of the Automobile to avoid injuring Wallace.

14) At the time of the Crash, a New York State Department of Motor Vehicles operator's license issued to Yodice had been permanently revoked.

15) At the time of the Crash, Yodice's operator's license had been revoked for motor vehicle offenses including operating a motor vehicle while under the influence of alcohol, and failure to pay related fines.

16) Prior to revocation of his operator's license, Yodice's operator's license contained the restriction that he only operate vehicles with an interlock device to prevent him from operating a motor vehicle while under the influence of alcohol.

17) At the scene of the Crash, officers of the New York City Police Department arrested Yodice on the charges of aggravated unlicensed operation in the first degree, aggravated unlicensed operation in the third degree, and unlicensed operation, which charges are currently pending against Yodice in a prosecution denominated Case # CR-013371-23NY in the Criminal Court for New York County.

18) At the time of the Crash, Yodice was not capable of operating the Automobile in a reasonably safe manner.

19) At the time of the Crash, Yodice's cognitive and physiological function were impaired by recent alcohol consumption.

- 20) On information and belief, Yodice failed in the following respects to discharge the duty of care owed to Wallace:
- a. in knowingly operating a motor vehicle on a public roadway after the revocation of Yodice's operator's license;
  - b. in knowingly operating a motor vehicle without an interlock device, in violation of a restriction included in Yodice's operator's license;
  - c. in operating a motor vehicle while impaired with respect to cognitive and physiological function by recent alcohol consumption;
  - d. in failing to use the mirrors and other safety equipment of the Automobile;
  - e. in double-parking other than for a permissible purpose, and thereby creating a traffic obstruction and hazard;
  - f. in moving a vehicle from a stopped, standing or parked position when it was not reasonably safe to do so;
  - g. in operating the Automobile at a speed greater than was reasonable and prudent under the conditions, and without due regard to the actual and potential hazards then existing;
  - h. in failing to keep a lookout for plaintiff;
  - i. in failing to ascertain the presence of the plaintiff, which could have been ascertained by the exercise of reasonable diligence and the ordinary use of the senses;
  - j. in making a turn or movement to the left without signaling;
  - k. in changing lanes when it was not reasonably safe to do so;
  - l. in attempting to pass the plaintiff when it was not reasonably safe to do so;
  - m. in attempting to pass the plaintiff on the right;
  - n. in causing contact with the plaintiff;
  - o. in making a U-turn where illegal to do so, or in doing so in an unsafe manner
  - p. in failing to obey the traffic rules and regulations governing the use and operation of motor vehicles in the State of New York;
  - q. in failing to sound a warning or give a signal to signify impending contact, and thus in failing to give plaintiff an opportunity to avoid the contact;

- r. in failing to use proper and good judgment in the operation of the Automobile;
- s. in failing to use all due care and caution in the operation, management and control of the Automobile;
- t. in operating a motor vehicle in a manner that could reasonably be expected to endanger persons or property;
- u. in interfering with plaintiff's free and proper use of the public highway;
- v. in unreasonably endangering plaintiff, a user of the public highway; and
- w. in failing to take any precautions against injuring the plaintiff.

21) In addition to constituting evidence of negligence pursuant to principles of the common law, Yodice's acts and omissions above constitute negligence *per se* and/or evidence of negligence as a matter of law, because they violated the standard of care for operators of motor vehicles set by the following statutes, rules, regulations and ordinances: New York Vehicle & Traffic Law Sections 509, 1122, 1122-a, 1128(a), 1123, 1146, 1160(e), 1162, 1163(b), 1180, 1192, 1202(a)(2), 1212; and New York City Administrative Code Section 19.190(b).

22) Yodice's negligent acts and omissions above, singly and in combination, proximately caused the Crash, as a matter of fact, and presumptively as a matter of law, pursuant to Vehicle & Traffic Law Section 1146(b).

23) The Negligence and Misconduct of Mancuso. On or before the time of the Crash, Yodice was entrusted with possession of the Automobile by Mancuso.

24) When Mancuso entrusted the Automobile to Yodice, she knew that Yodice's motor vehicle operator's license had been revoked.

25) When Mancuso entrusted the Automobile to Yodice, she knew that Yodice had a history of motor vehicle operation while intoxicated, and that Yodice had

been restricted by the Department of Motor Vehicles to operating vehicles with an interlock device to ensure operator sobriety.

26) When Mancuso entrusted the Automobile to Yodice, she knew the Automobile was not equipped with an interlock device.

27) When Mancuso entrusted the Automobile to Yodice, Mancuso knew that Yodice was not capable of operating a motor vehicle lawfully or safely.

28) When Mancuso entrusted the Automobile to Yodice, Mancuso, in the exercise of ordinary care, should have known that Yodice did not possess a valid motor vehicle operator's license.

29) When Mancuso entrusted the Automobile to Yodice, Mancuso did not take reasonable steps to ascertain whether Yodice possessed a valid motor vehicle operator's license.

30) On information and belief, Mancuso entrusted Yodice with the Automobile for the purpose of aiding him in unlawfully operating a motor vehicle in violation of his license revocation and restrictions.

31) Along with the Automobile, Mancuso entrusted to Yodice a temporary New Jersey license plate/tag (the "Temporary Tag").

32) The Temporary Tag Mancuso entrusted to Yodice was associated with a different Vehicle Identification Number ( [REDACTED] ) than that associated with the Automobile by the New York City Police Department in effecting the arrest of Yodice at the scene of the Crash ( [REDACTED] ).

33) Mancuso knowingly entrusted the Automobile with the Temporary Tag, with knowledge that the Temporary Tag was not issued in connection with a sale of a motor vehicle.

34) On information and belief, Mancuso procured the Temporary Tag from Direct Auto without purchasing a motor vehicle from Direct Auto, in violation of New Jersey Law.<sup>1</sup>

35) On information and belief, Mancuso procured the Temporary Tag from Direct Auto by knowingly providing Direct Auto with a VIN number and/or other vehicle title information that was false.

36) On information and belief, Mancuso entrusted Yodice with the Temporary Tag for the purpose of aiding him in unlawfully operating a motor vehicle in violation of his license revocation and restrictions.

37) On information and belief, Mancuso entrusted Yodice with the Temporary Tag with the intent of enabling Yodice to unlawfully operate the Automobile bearing the Temporary Tag in New York.

38) The Negligence and Misconduct of Direct Auto. Direct Auto sold the Temporary Tag to Mancuso without making an associated sale or lease of any motor vehicle, in violation of New Jersey Administrative Code Section § 13:21-15.9.

39) On information and belief, Direct Auto was not qualified to issue the Temporary Tag to Mancuso because it has not sold the requisite number of motor

---

<sup>1</sup> New Jersey Administrative Code Section § 13:21-15.9 provides that “A licensee authorized to issue temporary registrations by the Commission, may, in accordance with this section, issue a temporary registration for a new or used vehicle to a person or entity that has purchased or leased said vehicle from such dealer or leasing dealer provided that said vehicle is to be permanently registered in New Jersey. A bona fide sale or lease of such vehicle is a prerequisite to the issuance of a temporary registration.”

vehicles or otherwise has failed to meet the requirements promulgated by the New Jersey Motor Vehicle Commission codified at New Jersey Administrative Code Section §13:21-15 *et seq.*

40) On information and belief, Direct Auto has no phone number, no internet presence, and no personnel or vehicles for sale at its purported principal place of business, 330 East Commerce Street, Bridgeton, New Jersey.

41) On information and belief, Direct Auto is primarily or exclusively in the business of unlawfully selling temporary tags without selling or leasing motor vehicles in connection with tag sales.

42) On information and belief, Direct Auto knew that the Temporary Tag it sold to Mancuso would be affixed to a vehicle to be operated by Yodice, and/or to a vehicle used in interstate travel to New York and other states.

43) On information and belief, Direct Auto knew that persons purchasing temporary tags other than in connection with the purchase or lease of a motor vehicle do so in order to unlawfully operate a motor vehicle while hiding their identities and the identities of their vehicles.

44) On information and belief, Direct Auto knew that selling temporary tags other than in connection with the purchase or lease of a motor vehicle would provide assistance to persons intending to commit crimes and other wrongful acts with motor vehicles.

45) On information and belief, Direct Auto sold the Temporary Tag to Mancuso with the knowledge of, or with reckless indifference toward, the likelihood that Mancuso would use the Temporary Tag to facilitate unlawful activity.

46) It has been widely reported that numerous purported New Jersey car dealers are primarily in the business of unlawfully selling temporary tags; many of these dealers list as their principal place of business the same address as Direct Auto, and, like Direct Auto, do not actually conduct any business at that location. See Jesse Coburn, “GHOST TAGS Inside New York City’s Black Market for Temporary License Plates,” StreetsblogNYC/New Jersey Monitor, available at (<https://www.streetsblogprojects.org/ghost-tags-index>); Clio Chang, “Where are All Those Fake License Plates Coming From?”, Curbed (Apr. 6, 2023), available at: (<https://newjerseymonitor.com/2023/05/10/lawmakers-proposes-new-charges-for-selling-driving-with-illegal-temporary-license-plates/>); Jesse Coburn, “Lawmaker proposes new charges for selling, driving with illegal temporary license plates,” in New Jersey Monitor (May 10, 2023), available at (<https://newjerseymonitor.com/2023/05/10/lawmakers-proposes-new-charges-for-selling-driving-with-illegal-temporary-license-plates/>);

47) Vehicle operators use temporary tags to evade responsibility for toll payments, parking fines, and liability to persons in traffic they may strike and harm. See authorities cited in the immediate previous paragraph. Because the temporary tags are not associated in government records with the identifying information of the vehicle to which the temporary tag is affixed, the operator of such a vehicle can violate laws with impunity, unless they happen to engage in misconduct in front of police officers (as occurred in the case of the Crash).

48) Falco’s Sham Business and Disregard of the Corporate Form. On information and belief, Falco is the sole owner and the controller of Direct Auto.

49) On information and belief, Falco is running Direct Auto as a fraudulent and unlawful enterprise, the primary purpose of which is to sell temporary tags without making associated motor vehicle sales, so that the tags can be affixed to any vehicle that the purchaser chooses and operate the vehicle on public roads without accountability for unlawful acts.

50) On information and belief, Falco failed to treat Direct Auto as a separate entity, and instead completely controlled and dominated Direct Auto, inadequately capitalized and under-insured Direct Auto, commingled his personal assets with those of Direct Auto, failed to meet the regulatory requirements for Direct Auto to operate lawfully as a New Jersey auto dealer, and/or failed to properly maintain and conduct the corporate accounts, property and governance of Direct Auto in the manner required to establish the corporate existence of Auto Direct separate and apart from Falco.

51) On information and belief, Falco knew that the Temporary Tag and other Temporary Tags that Falco caused Direct Auto to unlawfully sell would foreseeably be operated in the state of New York.

**First Cause for Relief — Negligent Operation of a Motor Vehicle**

52) Plaintiff realleges the allegations set forth in the paragraphs above as if set forth fully herein.

53) Yodice was under a duty to refrain from driving, or from otherwise operating a motor vehicle in a manner likely to harm Wallace.

54) Yodice negligently operated the Automobile, failing to use the due care required of a reasonably prudent person operating a motor vehicle on a public roadway.

55) Yodice’s failure to meet the applicable duty of care proximately caused the Crash and Wallace’s resulting damages and losses, and therefore Yodice is liable to Wallace for compensatory damages in an amount to be determined at trial.

**Second Cause for Relief — Negligent Entrustment**

56) Plaintiff realleges the allegations set forth in the preceding paragraphs as if fully set forth herein.

57) Mancuso committed negligent acts and omissions, independent of those of Yodice, in the course of entrusting the Automobile to Yodice at a time and under circumstances in which Mancuso knew, or in the exercise of ordinary care should have known, that Yodice was not cable of operating the Automobile in a reasonable safe manner.

**WHEREFORE**, Wallace demands judgment against Yodice, Mancuso, Direct Auto and Falco for compensatory damages, each in amounts in excess of the jurisdictional threshold of this Court to be proven at trial, and for costs and disbursements.

Dated: New York, New York  
June 14, 2023

By:



Steve Vaccaro  
Law Office of Vaccaro & White  
*Attorney for Plaintiff*  
150 Broadway, Suite 1703  
New York, NY 10004  
Tel. No.: (212) 577-3040

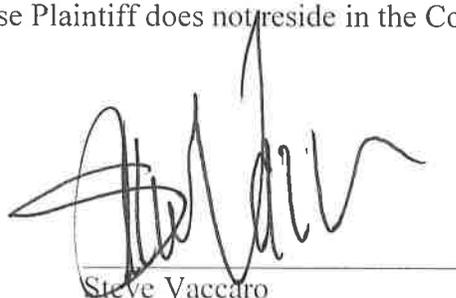
**ATTORNEY'S VERIFICATION**

I, Steve Vaccaro, an attorney duly admitted to practice before the Courts of the State of New York, affirm the following to be true under the penalties of perjury:

- 1) I am the attorney of record for the Plaintiff, Raymond Wallace.
- 2) I have read the annexed Verified Complaint and know the contents thereof, and the same are true to my knowledge, except those matters therein which are alleged upon information and belief, and as to those matters, I believe them to be true. My beliefs, as to those matters therein not stated upon knowledge, are based upon facts, records, and other pertinent information contained in my files.

This verification is made by me because Plaintiff does not reside in the County where I maintain my offices.

Dated: New York, NY  
June 14, 2023



Steve Vaccaro

Luke Eddins  
### Spencer Street  
Brooklyn, NY 11205  
leddins@gmail.com

Dear Councilmembers,

I would like to share my experience with ghost cars in Brooklyn over the past 6 months. I have seen an explosion of vehicles in my neighborhood parked and driving with fraudulent paper plates or more often, no plates at all. I have made an effort in recent months to make reports to 311 when I see a ghost car parked on the street. On most mornings on my way to work I see 5 or 6 on the streets outside my door. Since January I have submitted over two hundred 311 requests. The NYPD has dismissed almost all of these without taking any action. I live in the 79th police precinct in Bedstuy and I also pass through the 90th precinct in Williamsburg on my way to work. I have spoken with personnel at both precincts about the proliferation of ghost cars in the neighborhood but there seems to be real hesitancy to enforce the law.

The following are a few of my experiences with police enforcement of ghost vehicles:

**Tue, Jan. 31, 2023**

I observed a police interaction with the driver of a Black Ford Explorer. The officer asked the driver why there were no plates on the car. The driver said that he kept his plates inside the car. The officer requested that the driver put them on the car immediately. The driver said he would install the plates and the two officers left the scene. I waited around to watch him install the plates but instead he drove off without installing the plates. The following photos are of the same vehicle from later in February.



**Friday, April 7, 2023**

I saw a vehicle parked in the crosswalk, in front of a hydrant, and in the bike lane. It has no license plate and the VIN and registration are covered. I reported it with 311. I went to the 90th precinct to ask about it and the officer there told me there's basically nothing they can do because there is no way to identify the vehicle. I submitted 4 more 311 requests with no response. The following morning I went to the precinct again and convinced an officer to take a look. The officers ended up giving the car 5 parking tickets, the maximum allowed.



I think these bills will be a good start to deal with the problem of ghost vehicles but, from what I have observed, they will leave large parts of the problem unsolved.

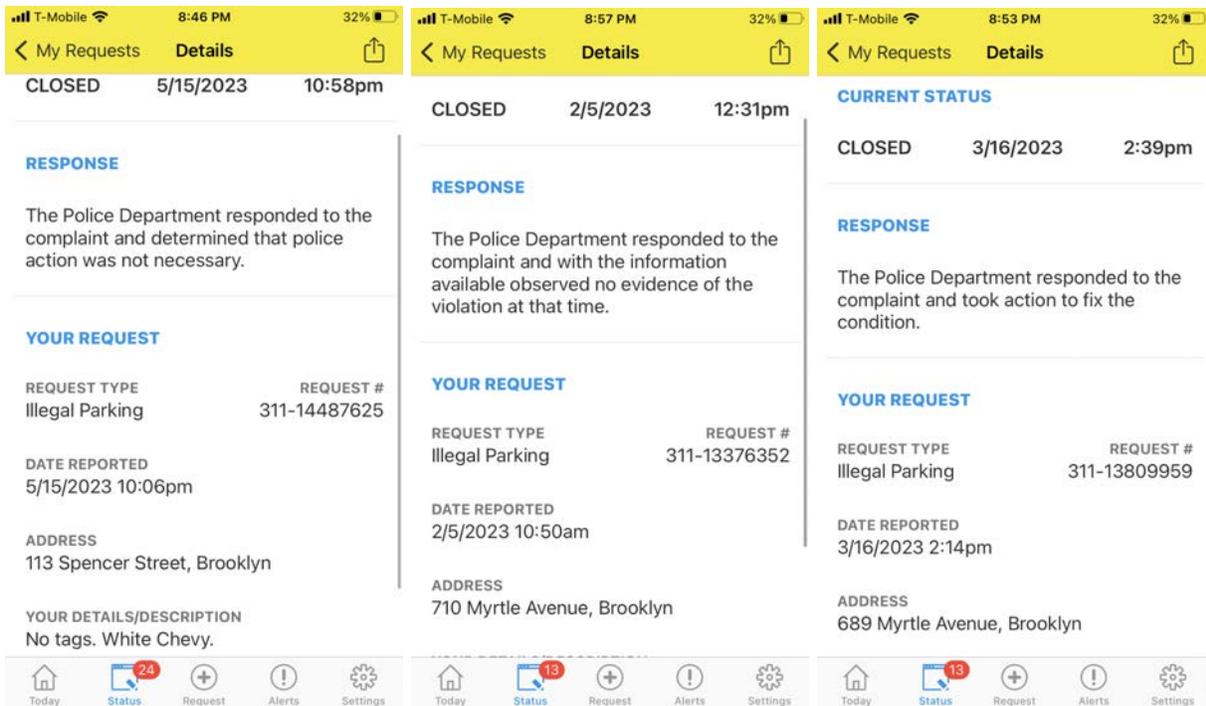
- In my neighborhood there are many cars that drive around and park on the street with no plates at all. They often have their VIN covered so NYPD has no way to give them a ticket.
- There are also many cars displaying expired (and probably fraudulent) paper plates. Many of these vehicles have their VIN covered. This makes it impossible to ticket them. Towing the car becomes the only mode of enforcement. I've been told by NYPD that it takes 24 hours to get a ROTOW. By the time a tow truck shows up the car will have moved. Allowing the use of **wheel "boots"** to immobilize ghost vehicles could be a solution.
- The NYPD has been very reluctant to ticket even the most egregious offenders. Since January 2023 I have submitted **over two hundred** 311 service requests about ghost vehicles that I see as I bike two and from work. Very, very few of these result in any kind of enforcement action. In most cases the NYPD claims no responsibility. The legislative response needs to take this into account.
- Many vehicles in my neighborhood have intentionally defaced plates. There is a vast array of strategies but the intention is the same: to make the car untraceable, and to avoid tolls and traffic camera violations. These are some of the methods I've seen since I started paying attention in January:
  - covering one of the digits with an object
  - spray paint
  - sand paper
  - altering the digits with electrical tape
  - lensed license plate covers

- folding the plate
- spinning plates!
- I've spoken with many different people within the NYPD. Everyone seems to have a different idea about who is responsible for enforcement against ghost vehicles. It would be helpful to clarify who is responsible for enforcement.

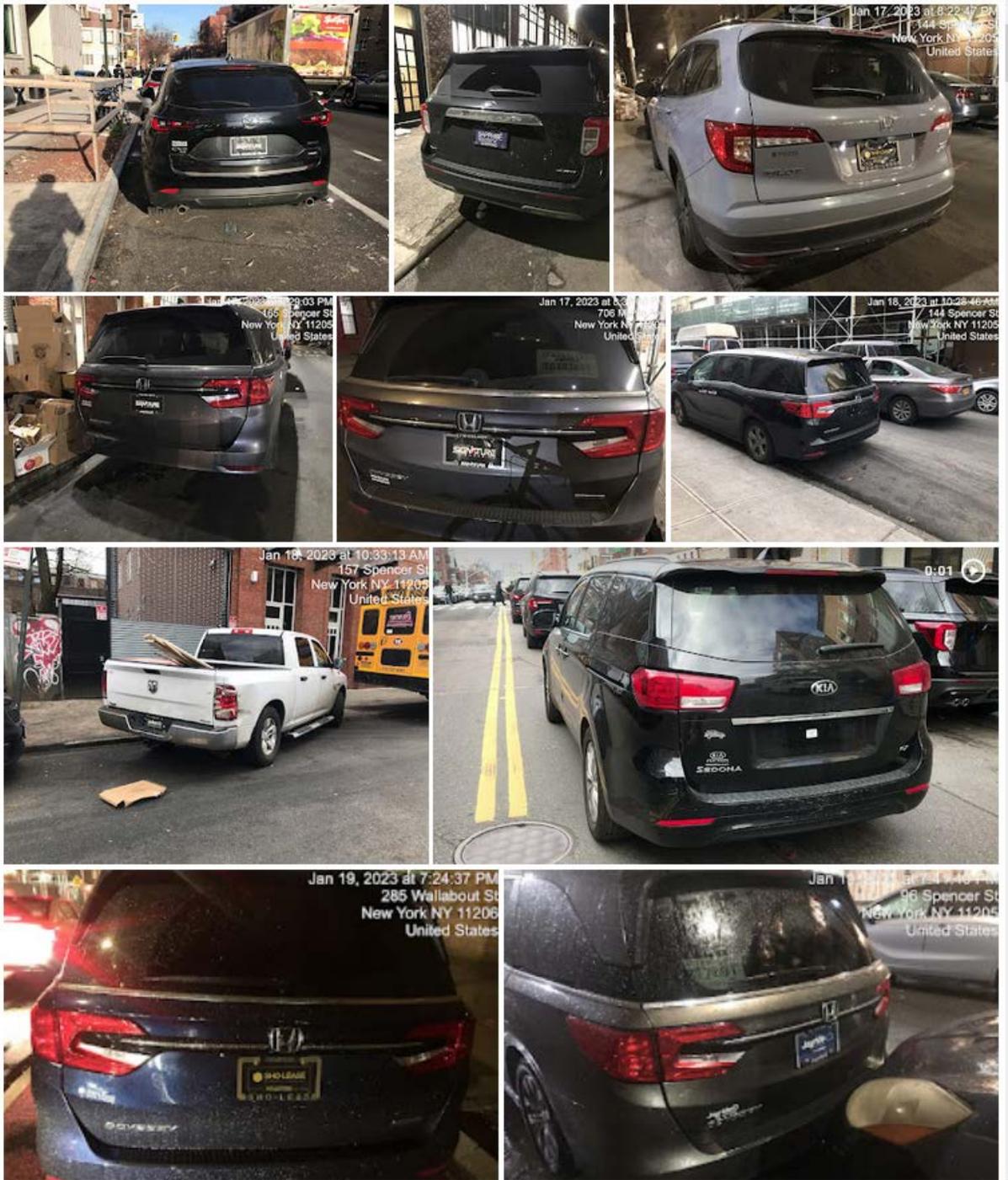
To summarize, the proposed legislation leaves these issues unanswered:

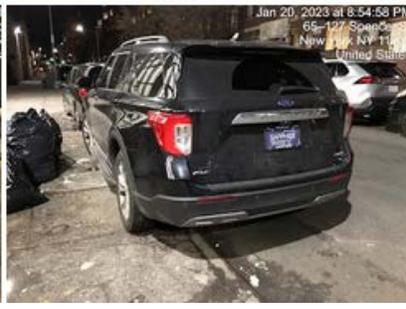
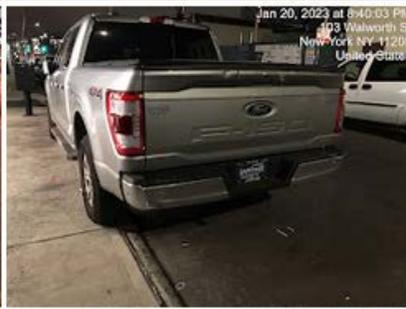
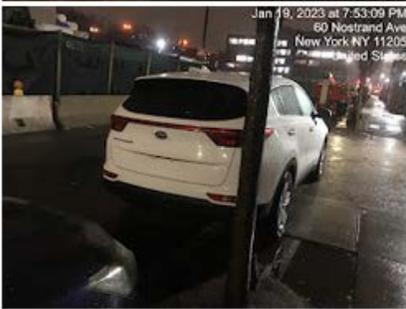
1. Missing plates
2. Covered VINs
3. Towing capacity and response time
4. Lax or selective enforcement
5. Defaced or covered plates
6. Confusion within City bureaucracy about what agency is responsible for enforcement.
  1. NYPD regular patrol?
  2. NYPD Traffic?
  3. DSNY?
  4. The Sheriff?

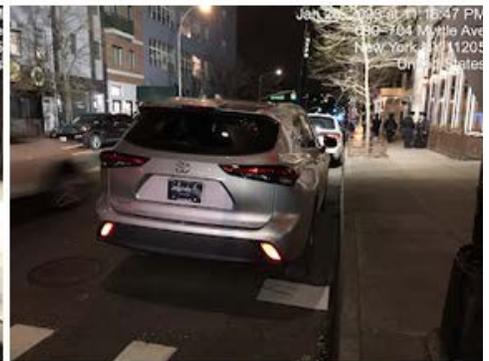
The following are typical responses from the NYPD. In most cases the requests are closed before a squad car even comes by.



The following photos are of ghost cars I reported to 311 this year.



































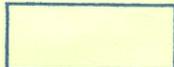






THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card



I intend to appear and speak on Int. No. <sup>Int. 987, 988</sup> 1011 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 6/26/23

(PLEASE PRINT)

Name: Maureen Kokeas, Director of the office

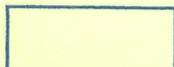
Address: of Tax Enforcement

I represent: Sheriff's office

Address: \_\_\_\_\_

Please complete THE COUNCIL THE CITY OF NEW YORK

Appearance Card



I intend to appear and speak on Int. No. <sup>Int. 987, 988</sup> 1011 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 6/26/23

(PLEASE PRINT)

Name: Deputy Chief Tania Kinsella

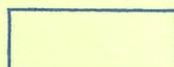
Address: NYPD

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

THE COUNCIL THE CITY OF NEW YORK

Appearance Card



I intend to appear and speak on Int. No. <sup>Int. 987, 988</sup> 987, 1011 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 6/26/23

(PLEASE PRINT)

Name: Deputy Chief Michael Pilecki

Address: NYPD

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Joshua Benson

Address: \_\_\_\_\_

I represent: DOT

Address: \_\_\_\_\_

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. Int 987, 988  
1011 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 6/26/23

(PLEASE PRINT)

Name: Maureen Kor  
Marriska Scott - McFadden Deputy

Address: Commissioner of Intergovernmental &

I represent: Legislative Affairs

Address: Dept of Social Services

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. Int 987  
988, 1011 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 6/26/23

(PLEASE PRINT)

Name: Josh Benson Deputy Commissioner

Address: of Traffic Operations

I represent: Department of Transportation

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 987/988 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 6/26/23

(PLEASE PRINT)

Name: ERIC McCLURE

Address: BROOKLYN, NY 11215

I represent: STREETSPAC

Address: 150 BROADWAY, SUITE 1703, NY NY 10038

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 987/988 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Jason Fromowitz

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Int. 481, 488  
1011 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 6/26/23

(PLEASE PRINT)

Name: Managing Attorney Juliane Farruggia

Address: NYPD

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

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

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

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

Date: \_\_\_\_\_

Name: Alex Stein (PLEASE PRINT)

Address: 7509 Inwood

I represent: Self

Address: \_\_\_\_\_

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

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. all Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: \_\_\_\_\_

Name: Danny Pearlstein (PLEASE PRINT)

Address: 150 Broadway

I represent: Riders Alliance

Address: \_\_\_\_\_

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