THE CITY OF NEW YORK
BUSINESS INTEGRITY COMMISSION
100 CHURCH STREET, 20TH FLOOR
NEW YORK, NEW YORK 10007

DECISION OF THE BUSINESS INTEGRITY COMMISSION DENING THE RENEWAL APPLICATION OF CORONA & SON TRUCKING, INC. FOR A REGISTRATION TO OPERATE AS A TRADE WASTE BUSINESS

Corona & Son Trucking, Inc. (the "Applicant" or "Corona") has applied to the New York City Business Integrity Commission ("Commission"), formerly named the New York City Trade Waste Commission, pursuant to Local Law 42 of 1996, for renewal of its exemption from licensing requirements for the removal of construction and demolition debris. See Title 16-A of the New York City Administrative Code ("Admin. Code"), §16-505(a). Local Law 42 was enacted to address pervasive organized crime and other corruption in the commercial carting industry, to protect businesses using private carting services, and to increase competition in the industry and thereby reduce prices.

Corona applied to the Commission for renewal of a registration enabling it to operate a trade waste business "solely engaged in the removal of waste materials resulting from building demolition, construction, alteration or excavation" – a type of waste commonly known as construction and demolition debris, or "C & D." Admin. Code §16-505(a). Local Law 42 authorizes the Commission to review and determine such applications for registration. See id. If, upon review and investigation of the application, the Commission grants the Applicant a registration, the Applicant becomes "exempt" from the licensing requirement applicable to businesses that remove other types of waste. See id.

In determining whether to grant a registration to operate a construction and demolition debris removal business, the Commission considers the same types of factors that are pertinent to the Commission's determination whether to issue a license to a business seeking to remove other types of waste. See, e.g., Admin. Code §16-504(a) (empowering Commission to issue and establish standards for issuance, suspension, and revocation of licenses and registrations); compare Title 17, Rules of the City of New York ("RCNY") §§1-06 & 2-02 (specifying information required to be submitted by license applicant) with id. §§1-06 & 2-03(b) (specifying information required to be submitted by registration applicant); see also Admin. Code §16-513(a)(i) (authorizing suspension or revocation of license or registration for violation of Local Law 42 or any rule promulgated pursuant thereto). Central to the Commission's investigation and determination of a registration application is whether the applicant has business integrity.

See 17 RCNY §1-09 (prohibiting numerous types of conduct reflecting lack of business integrity, including violations of law, knowing association with organized crime figures, false or misleading statements to the Commission, and deceptive trade practices); Admin. Code §16-509(a) (authorizing Commission to refuse to issue licenses to applicants lacking "good character, honesty and integrity"); Breeze Carting Corp. v. The City of New York, 52 A.D.3d 424, 860 N.Y.S.2d 103 (1st Dept. 2008).

Based upon the record as to the Applicant, the Commission denies its exemption/registration renewal application on the ground that this Applicant lacks good character, honesty and integrity for the following independent reasons:

1. The Applicant has knowingly failed to provide information and/or documentation required by the Commission and has provided false and misleading information to the Commission;

2. The Applicant violated the rules of the Business Integrity Commission and has been found liable in an administrative action that bears a direct relationship to the fitness of the Applicant to conduct a trade waste business;

3. The Applicant has failed to pay fines and judgments that are directly related to the Applicant's business for which the Department of Consumer Affairs, the State of New York, the Criminal Court of New York City, and the Workers' Compensation Board of New York State have entered judgments.

I. BACKGROUND

A. The New York City Carting Industry

Virtually all of the more than 200,000 commercial business establishments in New York City contract with private carting companies to remove and dispose of their refuse. Historically, those services have been provided by several hundred companies. For the past four decades, and until only a few years ago, the private carting industry in the City was operated as an organized crime-controlled cartel engaging in a pervasive pattern of racketeering and anticompetitive practices. The United States Court of Appeals for the Second Circuit has described that cartel as "a 'black hole' in New York City's economic life." Sanitation & Recycling Industry, Inc. v. City of New York, 107 F.3d 985, 989 (2d Cir. 1997) ("SRI").

Extensive testimonial and documentary evidence adduced during lengthy City Council hearings addressing the corruption that historically has plagued this industry revealed the nature of the cartel: an entrenched anti-competitive conspiracy carried out through customer-allocation agreements among carters, who sold to one another the exclusive right to service customers, and enforced by organized crime-connected racketeers, who mediated disputes among carters. See generally Peter Reuter, Racketeering in Legitimate Industries: A Study in the Economics of Intimidation (RAND Corp. 1987). After hearing the evidence, the City Council made numerous factual findings concerning organized crime's longstanding and corrupting influence over the City's carting industry and its effects, including the anticompetitive cartel, exorbitant carting

rates, and rampant customer overcharging. More generally, the Council found "that unscrupulous businesses in the industry have taken advantage of the absence of an effective regulatory scheme to engage in fraudulent conduct." Local Law 42 §1.

The City Council's findings of extensive corruption in the commercial carting industry have been validated by the successful prosecution of many of the leading figures and companies in the industry. In 1995 and 1996, the Manhattan District Attorney obtained racketeering indictments against more than sixty individuals and firms connected to the City's waste removal industry, including powerful mob figures such as Genovese organized crime family capo Alphonse Malangone and Gambino soldier Joseph Francolino. Simply put, the industry's entire modus operandi, the cartel, was indicted as a criminal enterprise. Since then, all of the defendants have either pleaded or been found guilty of felonies; many have been sentenced to lengthy prison terms, and many millions of dollars in fines and forfeitures have been imposed.

The Commission's regulatory and law-enforcement investigations have confirmed that organized crime has long infiltrated the construction and demolition debris removal sector of the carting industry as well as the garbage hauling sector that was the focus of the Manhattan District Attorney's prosecution. In light of the close nexus between the C & D sector of the carting industry and the construction industry, mob influence in the former should come as no surprise. The construction industry in New York City has been corrupted by organized crime for decades. See, e.g., James B. Jacobs, Gotham Unbound: How New York City Was Liberated from the Grip of Organized Crime 96-115 (1999) (detailing La Cosa Nostra's influence and criminal activity in the concrete, masonry, drywall, carpentry, painting, trucking, and other sectors of the City's construction industry).

Moreover, the C & D sector of the carting industry has been a subject of significant federal prosecutions over the past decade. In 1990, Anthony Vulpis, an associate of both the Gambino and the Genovese organized crime families, Angelo Paccione, and six waste hauling companies owned or controlled by them were convicted of multiple counts of racketeering and mail fraud in connection with their operation of a massive illegal landfill on Staten Island. See United States v. Paccione, 949 F.2d 1183, 1186-88 (2d Cir. 1991), cert. denied, 505 U.S. 1220 (1992). Many C & D haulers dumped their loads at this illegal landfill, which accumulated 550,000 cubic yards of refuse over a mere four-month period in 1988. During that period, "the City experienced a sharp decline in the tonnage of construction waste deposited" at its Fresh Kills Landfill, as well as "a concomitant decline in revenue" from the fees that would have been charged for dumping at a legal landfill. 949 F.2d at 1188. The trial judge described this scheme as "one of the largest and most serious frauds involving environmental crimes ever prosecuted in the United States." United States v. Paccione, 751 F. Supp. 368, 371 (S.D.N.Y. 1990).

Another illegal waste disposal scheme also prominently featured haulers of construction and demolition debris. This scheme involved certain "cover" programs instituted by the City of New York at Fresh Kills, under which the City obtained materials needed to cover the garbage and other waste dumped at the landfill. Under the "free cover" program, transfer stations and carting companies could dispose of "clean fill" (i.e., soil uncontaminated by debris) at Fresh Kills free of charge. Under the "paid cover" program, the City contracted with and paid carting companies to bring clean fill to Fresh Kills. Numerous transfer stations and carters, however,

abetted by corrupt City sanitation workers, dumped non-qualifying materials (including C & D) at Fresh Kills under the guise of clean fill. This was done by "cocktailing" the refuse: Refuse was placed beneath, and hidden by, a layer of dirt on top of a truckload. When the trucks arrived at Fresh Kills, they appeared to contain nothing but clean fill, which could be dumped free of charge.

In 1994, twenty-eight individuals, including numerous owners of transfer stations and carting and trucking companies, were indicted in connection with this scheme, which deprived the City of approximately $10 million in disposal fees. The indictments charged that from January 1988 through April 1992, the defendants participated in a racketeering conspiracy and engaged in bribery and mail fraud in connection with the operation of the City's "cover" programs. The various hauling companies, from Brooklyn, Queens, and Staten Island, were charged with paying hundreds of thousands of dollars in bribes to Department of Sanitation employees to allow them to dump non-qualifying materials at Fresh Kills without paying the City's tipping fees. See United States v. Cafra, et al., No. 94 Cr. 380 (S.D.N.Y.); United States v. Barbieri, et al., No. 94 Cr. 518 (S.D.N.Y.); see also United States v. Caccio, et al., Nos. 94 Cr. 357,358, 359, 367 (four felony informations). Twenty-seven defendants pleaded guilty in 1994 and 1995, and the remaining defendant was found guilty in 1996 after trial.

In sum, the need to root organized crime and other forms of corruption out of the City's waste removal industry applies with equal force to the garbage hauling and the C & D sectors of the industry. Local Law 42 recognizes this fact in requiring C & D haulers to obtain registrations from the Commission in order to operate in the City. See Attonito v. Maldonado, 3 A.D.3d 415, 771 N.Y.S.2d 97 (1st Dept. 2004).

B. Local Law 42

Upon the enactment of Local Law 42, the Commission assumed regulatory authority from the Department of Consumer Affairs ("DCA") for the licensing and registration of businesses that remove, collect, or dispose of trade waste. See Admin. Code §16-503. "Trade waste" is broadly defined and specifically includes "construction and demolition debris." Id. §16-501(f)(1). The carting industry quickly challenged the new law, but the courts have consistently upheld Local Law 42 against repeated facial and as-applied constitutional challenges by New York City carters. See, e.g., Sanitation & Recycling Industry, Inc. v. City of New York, 928 F. Supp. 407 (S.D.N.Y. 1996), aff'd, 107 F.3d 985 (2d Cir. 1997); Universal Sanitation Corp. v. Trade Waste Comm'n, No. 96 Civ. 6581 (S.D.N.Y. Oct. 16, 1996); Vigliotti Bros. Carting Co. v. Trade Waste Comm'n, No. 115993/96 (Sup. Ct. N.Y. Cty. Dec. 4, 1996); Fava v. City of New York, No. CV-97-0179 (E.D.N.Y. May 12, 1997); Imperial Sanitation Corp. v. City of New York, No. 97 CV 682 (E.D.N.Y. June 23, 1997); PJC Sanitation Services, Inc. v. City of New York, No. 97-CV-364 (E.D.N.Y. July 7, 1997). The United States Court of Appeals has definitively ruled that an applicant for a trade waste removal license under Local Law 42 has no entitlement to and no property interest in a license, and the Commission is vested with broad discretion to grant or deny a license application. SRI, 107 F.3d at 995; see also Daxor Corp. v. New York Dep't of Health, 90 N.Y.2d 89, 98-100, 681 N.E.2d 356, 659 N.Y.S.2d 189 (1997); Attonito, 3 A.D.3d 415.

Local Law 42 specifically permits the Commission to refuse to issue a registration to an applicant "who has knowingly failed to provide the information and/or documentation required by the commission pursuant to [Title 16 of the Administrative Code or any rules promulgated thereto]" or "who has otherwise failed to demonstrate eligibility for such license." Admin. Code §16-509(b). Applicants who knowingly fail to provide information required by the Commission (whether they fail to provide the information altogether or they provide false and misleading information) fall under the first prong. In Attonito v. Maldonado, 3 A.D.3d 415 (1st Dept. 2004); *leave denied*, 2 N.Y.3d 705 (2004), the Appellate Division affirmed the authority of the Commission to "review" exemption applications, to fully investigate any matter within its jurisdiction and to deny such applications in those cases "where the applicant fails to provide the necessary information, or knowingly provides false information." It further affirmed the authority of the Commission to investigate the accuracy of the information provided in an application. Id.

Applicants who fail to demonstrate good character, honesty and integrity using the criteria by which license applicants are judged fall under the second prong of §16-509(b). While the Appellate Division in Attonito did not directly address the second prong, by affirming the Commission's authority to investigate matters within the trade waste industry, it necessarily follows that the Commission need not ignore the results of its investigation that bear on an applicant's good character, honesty and integrity. Id.; accord Breeze Carting Corp. v. The City of New York, 52 A.D.3d 424, 860 N.Y.S.2d 103 (1st Dept. 2008) (Commission denial not arbitrary and capricious where based on a criminal conviction, identification as an organized crime associate, and false and misleading statements). Accordingly, the Commission evaluates whether applicants meet the fitness standard using the same criteria upon which license applicants may be denied, including:

1. failure by such applicant to provide truthful information in connection with the application;

2. a pending indictment or criminal action against such applicant for a crime which under this subdivision would provide a basis for the refusal of such license, or a pending civil or administrative action to which such applicant is a party and which directly relates to the fitness to conduct the business or perform the work for which the license is sought, in which cases the commission may defer consideration of an application until a decision has been reached by the court or administrative tribunal before which such action is pending;

3. conviction of such applicant for a crime which, considering the factors set forth in section seven hundred fifty-three of the correction law, would provide a basis under such law for the refusal of such license;

4. a finding of liability in a civil or administrative action that bears a direct relationship to the fitness of the applicant to conduct the business for which the license is sought;

5. commission of a racketeering activity or knowing association with a person who has been convicted of a racketeering activity, including but not limited to the offenses listed in subdivision one of section nineteen hundred sixty-one of the Racketeer Influenced and Corrupt Organizations statute (18 U.S.C. § 1961 et seq.) or of an offense listed in subdivision one of section 460.10 of the penal law, as such statutes may be amended from time to time, or the equivalent offense under the laws of any other jurisdiction;

6. association with any member or associate of an organized crime group as identified by a federal, state or city law enforcement or investigative agency when the applicant knew or should have known of the organized crime associations of such person;

7. having been a principal in a predecessor trade waste business as such term is defined in subdivision a of section 16-508 of this chapter where the commission would be authorized to deny a license to such predecessor business pursuant to this subdivision;

8. current membership in a trade association where such membership would be prohibited to a licensee pursuant to subdivision j of section 16-520 of this chapter unless the commission has determined, pursuant to such subdivision, that such association does not operate in a manner inconsistent with the purposes of this chapter;

9. the holding of a position in a trade association where membership or the holding of such position would be prohibited to a licensee pursuant to subdivision j of section 16-520 of this chapter;

10. failure to pay any tax, fine, penalty, or fee related to the applicant's business for which liability has been admitted by the person liable therefor, or for which judgment has been entered by a court or administrative tribunal of competent jurisdiction.

Admin. Code § 16-509(a)(i)-(x). While the presence of one of the above factors in the record of a registration applicant would not necessarily require a denial as a matter of law, the Commission may consider such evidence as a factor in determining overall eligibility.

II. DISCUSSION

Corona applied to the Commission for an exemption from licensing requirements and a registration to operate as a trade waste business pursuant to Local Law 42 of 1996. See Corona's Application for Exemption from Licensing Requirement for Removal of Demolition Debris ("Registration Application"). The sole principal of the Applicant is Joe Corona (also known as "Hector Corona"). See Registration Application at 9; September 8, 2008 Renewal Application for License or Registration as a Trade Waste Business ("Renewal Application") at 5. On or about September 12, 2006, the Commission granted the Applicant a trade waste registration. See

Corona Registration Order. On September 28, 2006, Joe Corona signed the Registration Order, thereby consenting to the terms and conditions therein. See Registration Order at 6. Corona's registration was effective for two years, and expired on September 30, 2008. See id.

On October 25, 2006, Corona was arrested and charged with attempted criminal contempt and second degree harassment for following his ex-girlfriend in his car, in violation of an order of protection. See Criminal History Record Search Printout. On June 5, 2007, Corona was convicted, after a bench trial, of attempted criminal contempt, in the second degree (a misdemeanor) and harassment in the second degree (a violation). He was sentenced to a conditional discharge. See Id.

On or about September 8, 2008, the Applicant filed the Renewal Application with the Commission. See Renewal Application. The Applicant was authorized operate pending a review of that application. Joe Corona certified that the information contained in the Registration Application and the Renewal Application was accurate and truthful. See Registration Application at 16; Renewal Application at 10.

On March 4, 2010, the staff issued a 10-page recommendation that the application be denied. The Applicant was served with the recommendation on or about March 4, 2010 and was granted ten business days to respond (March 17, 2010). See 17 RCNY §2-08(a). The Applicant failed to submit a response (or a request for additional time to respond) by that deadline.

The Commission has carefully considered the staff's recommendation and for the independently sufficient reasons set forth below, the Commission finds that Corona & Son Trucking, Inc. lacks good character, honesty, and integrity, and denies its registration renewal application.

III. GROUNDS FOR DENIAL

A. The Applicant has knowingly failed to provide information and/or documentation required by the Commission and has provided false and misleading information to the Commission.

On October 25, 2006, Corona was arrested and charged with attempted criminal contempt and second degree harassment for following his ex-girlfriend in his car, in violation of an order of protection. See Criminal History Record Search Printout. On June 5, 2007, Corona was convicted, after a bench trial, of attempted criminal contempt, in the second degree (a misdemeanor) and harassment in the second degree (a violation). He was sentenced to a conditional discharge. See Id. The Applicant has provided the Commission with false and misleading information about the arrest and conviction of the Applicant's principal in its Renewal Application and has failed to respond to a Commission Directive.

1. The Applicant provided false and misleading information on its Renewal Application.

The Commission may refuse to issue a registration to an applicant who has failed "to provide truthful information in connection with the application." See Admin. Code §16-509(a),

(b); Attonito, 3 A.D.3d 415. See also Breeze Carting Corp. v. The City of New York, 52 A.D.3d 424, 860 N.Y.S.2d 103 (1st Dept. 2008). Joe Corona certified that the Renewal Application submitted to the Commission by Corona was complete and truthful. See Renewal Application at 10. Yet, the Applicant falsely answered "no" to the question, "Have you or any of your principals, employees, or affiliates been convicted of any criminal offense in any jurisdiction, or been the subject of any criminal charges in any jurisdiction?" See Renewal Application at 2. As described above, in reality, Joe Corona was the subject of criminal charges and was convicted of a criminal offense. Neither the criminal charges nor the conviction were disclosed by the Applicant in its Renewal Application. Thus, the Applicant provided false and misleading information to the Commission on its Renewal Application.

2. The Applicant has failed to respond to a Commission Directive.

"[T]he commission may refuse to issue a license or registration to an applicant for such license or an applicant for registration who has knowingly failed to provide the information and/or documentation required by the commission pursuant to this chapter or any rules promulgated pursuant hereto." Admin. Code §16-509(b). As discussed in detail below, on or about December 16, 2009, the Commission directed the Applicant to pay a $30,000 fine, as ordered by the Department of Consumer Affairs "before the close of business on January 15, 2009 [*sic*]." See December 16, 2009 Commission Directive by John Fellin to Applicant; See Section B *infra*. Again, as of the date of this recommendation, the Applicant has not responded to the Commission's directive. By failing to respond to the Commission's directive, the Applicant has "knowingly failed to provide the information" required by the Commission.[1] The failure of the Applicant to provide truthful and non-misleading information to the Commission is evidence that the Applicant lacks good character, honesty, and integrity. The Applicant did not dispute this point, leaving this ground uncontested. Accordingly, the Commission concludes that this Applicant lacks good character, honesty, and integrity and denies the Applicant's registration renewal application on this independently sufficient ground. See Admin. Code §§16-509(b); 16-509(a)(i).

B. The Applicant violated the rules of the Business Integrity Commission and has been found liable in an administrative action that bears a direct relationship to the fitness of the Applicant to conduct a trade waste business.

The commission may refuse to issue a license to an applicant "after a finding of liability in an administrative action that bears a direct relationship to the fitness of the applicant to conduct the business." See Admin. Code §16-509(a)(iv); see also §16-509(c)(ii); see also §16-513(a)(i).

On January 12, 2009, the Commission issued a Notice of Violation, Violation Number TW-3375, charging the Applicant with, (1) knowingly failing to notify the Commission of the

[1] Among other things, the Applicant also violated 17 RCNY §1-09 by "refus[ing] to answer an inquiry from the Commission," and "violat[ing] or fail[ing] to comply with any order or directive of the Commission." See 17 RCNY §1-09. Additionally, by failing to "at all times cooperate fully with the Commission, including providing requested information on a timely basis," the Applicant also violated the terms of the Registration Order it agreed to sign. See Registration Order at 5.

arrest of principal Joe Corona, in violation of 17 RCNY §2-05; (2) making false and/or misleading statements to the Commission, in violation of 17 RCNY §1-09; and (3) failing to provide information and/or documentation required by the Commission, in violation of Admin. Code §16-509(b). See Notice of Violation, Violation Number TW-3375. On November 12, 2009, the date of the scheduled hearing, the Applicant failed to appear, and failed to contest the charges. As a result, the Applicant was found guilty upon default. See November 20, 2009 Default Decision and Order ("Default Decision and Order") by Mitchell B. Nisonoff, Administrative Law Judge ("ALJ") for the Department of Consumer Affairs. ALJ Nisonoff ordered the Applicant to pay a total fine of thirty thousand ($30,000) dollars.[2] As of the date of this decision, the Applicant has failed to pay the fine.

The Applicant violated the rules of the Business Integrity Commission and disregarded the consequences. An ALJ for the Department of Consumer Affairs found the Applicant liable in an administrative action that bears direct relationship with the Applicant's ability to conduct business in compliance with Local Law 42 in the New York City trade waste industry. The Notice of Violation resulted in total fines and penalties of thirty thousand ($30,000) dollars, which the Applicant has failed to pay and has failed to address. The Applicant did not dispute this point, leaving this ground uncontested. Based on this independently sufficient ground, this Renewal Application is denied.

C. The Applicant has failed to pay fines and judgments that are directly related to the Applicant's business for which the Department of Consumer Affairs, the State of New York, the Criminal Court of New York City, and the Workers' Compensation Board of New York State have entered judgments.

The commission may refuse to issue a license to an applicant "upon the failure of the applicant to pay any tax, fine, penalty, fee related to the applicant's business...for which judgment has been entered by a[n] ... administrative tribunal of competent jurisdiction..." See Admin. Code §16-509(a)(x); see also §16-509(c)(ii); see also §16-513(a)(iv).

As discussed above, by decision dated November 20, 2009, Department of Consumer Affairs ALJ Mitchell B. Nisonoff found the Applicant guilty of violating 17 RCNY §2-05, 17 RCNY §1-09 and Admin. Code §16-509(b), and ordered the Applicant to pay a fine of thirty thousand ($30,000) dollars. As of the date of this decision, the Applicant has not paid the fine ordered by the Department of Consumer Affairs.

In addition, according to a judgment and lien search dated January 26, 2010, the following outstanding judgments have been docketed against the Applicant (totaling $85,504):

1. State of New York, #001399295, filed 10/17/09; $304
2. Criminal Court of New York City, #2423974, filed 5/29/08; $200

[2] The November 20, 2009 Default Decision and Order informs the Applicant: "If you wish to file a **MOTION TO VACATE** this decision, you must submit the motion to the Director of Adjudication, Department of Consumer Affairs... **within 15 days** from the date you knew or should have known of this decision..." See November 20, 2009 Default Decision and Order. Thus, the Applicant's time to file a motion to vacate this Default Decision and Order has expired.

3. Criminal Court of New York City, #2423975, filed 5/29/08; $200
4. Criminal Court of New York City, #2423976, filed 5/29/08; $200
5. Criminal Court of New York City, #2423978, filed 5/29/08; $200
6. Criminal Court of New York City, #47804460, filed 5/29/08; $200
7. Criminal Court of New York City, #2423979, filed 5/29/08; $200
8. Workers' Compensation Board of New York State, #1380780, filed 8/21/09; $84,000

See Judgment and Lien Search Results dated January 26, 2010. As of the date of this decision, the judgments remain open and unpaid.

Again, as of the date of this decision, the Applicant has failed to pay the fines ordered by the Department of Consumer Affairs and the judgments filed by the State of New York, the Criminal Court of New York City, and the Workers' Compensation Board of New York State. The Applicant did not dispute this point, leaving this ground uncontested. Based on this independently sufficient reason, this application is denied.

IV. CONCLUSION

The Commission is vested with broad discretion to refuse to issue a license or registration to any applicant that it determines lacks good character, honesty, and integrity. The evidence recounted above demonstrates convincingly that Corona & Son Trucking, Inc. falls far short of that standard. Based upon the above independently sufficient reasons, the Commission denies Corona & Son Trucking's exemption renewal application and registration.

This renewal exemption/registration denial is effective immediately. Corona & Son Trucking, Inc. may not operate as a trade waste business in the City of New York.

Dated: June 28, 2010

THE BUSINESS INTEGRITY COMMISSION

Michael J. Mansfield
Commissioner/Chair

John Doherty, Commissioner
Department of Sanitation

Andrew Eiler, Director of Legislative Affairs (designee)
Department of Consumer Affairs

Jayme Naberezny, Inspector General (designee)
Department of Investigation

Deborah Buyer, General Counsel (designee)
Department of Business Services

Brian O'Neill, Inspector (designee)
New York City Police Department