



The City of New York
BUSINESS INTEGRITY COMMISSION
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**DECISION OF THE BUSINESS INTEGRITY COMMISSION DENYING THE
REGISTRATION APPLICATION OF GREEN EARTH SOLUTIONS, INC.
(BIC #3539) TO OPERATE AS A TRADE WASTE BUSINESS**

Introduction

Green Earth Solutions, Inc. (“Green Earth” or the “Applicant”) (BIC #3539) has applied to the New York City Business Integrity Commission (the “Commission”) for an exemption from licensing requirements and a registration 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.” See Title 16-A, New York City Administrative Code (“Administrative Code” or “Admin. Code”) § 16-505(a).

On October 6, 2015, the Commission’s staff issued and served the Applicant, via email and first class mail to the business address, with Notice to Green Earth Solutions, Inc. of the Grounds to Recommend the Denial of the Registration Application of Green Earth Solutions, Inc. to Operate as a Trade Waste Business (the “Notice of Denial”). See Affidavit of Service dated October 6, 2015. The Applicant had 10 business days to respond to the Notice of Denial, which period expired on October 21, 2015. See Title 17 Rules of the City of New York (“RCNY”) §2-08(a). The Applicant did not submit a response. The Commission has now completed its review of Green Earth’s application, having carefully considered the Commission staff’s Notice of Denial and the Applicant’s lack of response. Based on the record as to the Applicant, the Commission denies the Applicant’s registration application based on the following independently sufficient reasons:

- A. The Applicant Failed to Disclose Michael Pierce as a Principal;**
- B. The Applicant Has Engaged in Unregistered Trade Waste Removal Activity; and**
- C. The Applicant and Its Undisclosed Principal Are Parties to a Civil Lawsuit relating to the Trade Waste Industry and a Substantial Unpaid Judgment.**

Background and Statutory Framework

Every commercial business establishment in New York City must contract with a private carting company to remove and dispose of the waste it generates, known as trade waste. Historically, the private carting industry in the City was operated as a cartel controlled by organized crime. As evidenced by numerous criminal prosecutions, the industry was plagued by pervasive racketeering, anticompetitive practices and other corruption. See, e.g., United States v.

Int'l Brotherhood of Teamsters (Adelstein), 998 F.2d 120 (2d Cir. 1993); People v. Ass'n of Trade Waste Removers of Greater New York Inc., Indictment No. 5614/95 (Sup. Ct. N.Y. Cty.); United States v. Mario Gigante, No. 96 Cr. 466 (S.D.N.Y.); People v. Ass'n of Trade Waste Removers of Greater New York, 701 N.Y.S.2d 12 (1st Dep't 1999). The construction and demolition debris removal sector of the City's carting industry specifically has also been the subject of significant successful racketeering prosecutions. See United States v. Paccione, 949 F.2d 1183, 1186-88 (2d Cir. 1991), cert. denied, 505 U.S. 1220 (1992); United States v. Cafra, No. 94 Cr. 380 (S.D.N.Y.); United States v. Barbieri, No. 94 Cr. 518 (S.D.N.Y.).

The Commission is charged with, among other things, combating the influence of organized crime and preventing its return to the City's private carting industry, including the construction and demolition debris removal industry. Instrumental to this core mission is the licensing scheme set forth in Local Law 42, which created the Commission and granted it the power and duty to license and regulate the trade waste removal industry in New York City. NY Admin. Code § 16-505(a). This regulatory framework continues to be the primary means of ensuring that an industry once overrun by corruption remains free from organized crime and other criminality, and that commercial businesses that use private carters can be ensured of a fair, competitive market.

Pursuant to Local Law 42, a company "solely engaged in the removal of waste materials resulting from building demolition, construction, alteration or excavation," also known as construction and demolition debris, must apply to the Commission for an exemption from the licensing requirement. Id. If, upon review of an application, the Commission grants an exemption from the licensing requirement, it issues the applicant a Class 2 registration. Id. at § 16-505(a)-(b). Before issuing such registration, the Commission must evaluate the "good character, honesty and integrity of the applicant." Id. at § 16-508(b); see also id. at § 16-504(a). An "applicant" for a license or registration means both the business entity and each principal thereof. Id. at § 16-501(a).

The Administrative Code provides an illustrative list of relevant factors for the Commission to consider in making a decision on an application for a license or registration:

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.

Id. at § 16-509(a)(i)-(x). See also id. at § 16-504(a).

The Commission also may refuse to issue a license or registration to any applicant who has “knowingly failed to provide information or documentation required by the Commission . . . or who has otherwise failed to demonstrate eligibility for a license.” Id. at § 16-509(b). See also

Elite Demolition Contracting Corp. v. The City of New York, __ N.Y.S.2d __, 125 A.D.3d 576 (1st Dep't 2015); Breeze Carting Corp. v. The City of New York, 52 A.D.3d 424 (1st Dep't 2008); Attonito v. Maldonado, 3 A.D.3d 415 (1st Dep't) (Commission may deny an application for an exemption "where the applicant fails to provide the necessary information, or knowingly provides false information"); leave denied 2 N.Y.3d 705 (N.Y. 2004). See also Admin. Code § 16-509(a)(i) (failure to provide truthful information in connection with application as a consideration for denial). In addition, the Commission may refuse to issue a license or registration to an applicant that "has been determined to have committed any of the acts which would be a basis for the suspension or revocation of a license." Id. at § 16-509(c). See also id. at § 16-504(a). Finally, the Commission may refuse to issue a license or registration to any applicant where the applicant or its principals have previously had their license or registration revoked. Id. at § 16-509(d); see also id. at § 16-504(a).

An applicant for a private carting license (including a registration for hauling construction and demolition debris) has no entitlement to and no property interest in a license or registration, and the Commission is vested with broad discretion to grant or deny a license or registration application. Sanitation & Recycling Indus., Inc., 107 F.3d 985, 995 (2d Cir. 1997); see also Daxor Corp. v. New York Dep't of Health, 90 N.Y.2d 89, 98-100 (N.Y. 1997).

Statement of Facts

1. Application History

On August 20, 2009, the Applicant applied to the Commission for an exemption from licensing requirements as a trade waste business that removes construction and demolition debris (commonly known as "C&D"). See Application. The Application disclosed Michele Pierce as sole principal. See id. at p. 9. The Application disclosed Michele Pierce's husband, Michael Pierce, as a previous sole principal of the Applicant, but did not disclose that he had any current role at Green Earth.¹ See id. at p. 11. Michael Pierce incorporated the Applicant in 1997. See id.

Michele Pierce (the disclosed principal) appeared at the Commission for a sworn interview in March 2012 ("First Sworn Interview"). In July 2015, she was interviewed at the Commission for a second time ("Second Sworn Interview"). According to Michele's testimony at the First Sworn Interview, the Applicant lay dormant until 2005, when Michele bought the company from Michael for \$1.00, and the company then became operational. See transcript of First Sworn Interview, dated March 30, 2012 ("First Sworn Interview Tr.") at 11. Michele further testified, "I wanted to have my own income, and have my own thing going, so in case anything were to happen, I'd have my own company and income." Id. at 10.

On May 15, 2009, Green Earth filed with the New York State Division of Corporations as a foreign business doing business in New York State. Michele and Michael Pierce live in Allentown, Pennsylvania. See Registration Application at p. 9. The Applicant used a Newark, New Jersey address its filing with the NYS Division of Corporations, as well as on the Application. See dos.ny.gov/corp/bus_entity_search.html (New York State Department of State Division of Corporations website). Therefore, the Applicant was required to list an in-city agent for service

¹ For ease of reference, Michele Pierce is often referred to herein as "Michele"; Michael Pierce is often referred to herein as "Michael."

of process. The Applicant listed her nephew, Merlin Alston, principal of Clean Soil Solutions, BIC #4511.² See Application at p. 2.

2. An Undisclosed Principal Controls the Applicant

During the Commission's staff's background investigation in connection with the Application, Commission investigators began to question whether Michael Pierce is an undisclosed principal. As set forth below, the background investigation revealed that Michael was the principal at a predecessor company called Global Environmental Technologies ("Global"), which had a Commission-issued registration that expired shortly before the Applicant submitted the Application.³ In addition, the evidence demonstrates that Michele had limited personal experience in or knowledge of the trade waste industry, such that it is unlikely that she is able to control the operations of the Applicant on her own.

a. Green Earth Applies for a Registration Shortly before Global's Registration Expires

The demise of Global came as a result of a lawsuit brought against it in July 2007. See La Barbera, et al. v. Global Env'tl. Techs. Inc., 2:07-cv-2794-LDW-AKT (E.D.N.Y.) (the "La Barbera Litigation"). In that case, Local 282 of the International Brotherhood of Teamsters ("Local 282") sued Global, alleging that they had failed to pay the proper amounts into the Local 282 Trust Funds pursuant to the collective bargaining agreement ("CBA"). See La Barbera Litigation Complaint. On September 11, 2012, a consent judgment was entered against Global for \$542,262.24, plus \$116.53 per diem interest starting in January 2012. See La Barbera Litigation Consent Judgment, dated September 11, 2012. The judgment also included continuing discovery demands with which Global agreed to comply. Additionally, should Global be declared "in breach" of the judgment, a \$100 fine would be levied for each day of the breach. See id. Global has not complied with this judgment and there are continuing discovery demands outstanding against the Applicant and Michael Pierce. See, Subpoena Duces Tecum, 07-CV-02794, May 14, 2014; letter from Local 282 to Hon. A. Kathleen Tomlinson, dated July 27, 2015 (will file status update with Court October 9, 2015).

Four months before Global's Commission-issued registration expired, Green Earth submitted the Application to the Commission, listing Michele as the sole principal. However, as demonstrated below, Michele lacks the base of knowledge necessary to act as the sole principal of Green Earth. Instead, it is likely that her husband Michael is also principal of the company, notwithstanding the fact that the Applicant does not disclose him as such. In fact, many of the functions that Michele has described Michael as performing for the company are the same functions she has said that she performs.

² Clean Soil Solutions filed a Class 2 renewal application with the Commission on April 9, 2015. That application is currently pending.

³ Global was assigned BIC #2719. Its registration expired on December 31, 2009. According to Michele Pierce, Global was a transportation company that did its own excavation and disposal of the results of the excavation. See Second Sworn Interview Tr. at 10.

b. The Sole Disclosed Principal Does Not Have Experience in the Trade Waste Removal Industry

At the First Sworn Interview, Michele was unable to adequately describe her daily duties as the sole principal of Green Earth and her role at the company. Her answers were vague, providing scant detail regarding such issues as the securing of jobs, contracts, paperwork, individual job duties and responsibilities, details relating to job procurement or other matters with which someone running a trade waste removal business would be familiar. For example, when asked about her role at the company, Michele answered, “Um, paperwork, paperwork, planning jobs, um, what trucks are going where, um, okay, planning a job.” First Sworn Interview Tr. at 14. She also testified as follows:

Q: So when you go to job sites what do you do?

A: I, just, uh, maybe see how they’re loading the trucks or make sure – just to see what’s going on at the job site, how they’re loading, um, pretty much it.

Q: Okay. Do you go to see anyone specific when you go to a job site?

A: No.

Q: Okay. And aside from seeing how they’re loading, is there anything else that you do when you go to a job site?

A: No.

Id. at 95-96.

Michele was also asked about the transfer stations that Green Earth uses to dispose of the trade waste that it hauls away from the various job sites.⁴ Of course, transfer stations are crucial to trade waste haulers; the haulers require a place to bring the waste. Michele could not identify the location of some of the transfer stations that Green Earth uses or why it uses those particular transfer stations. She testified that Green Earth uses a Clean Earth facility in New Jersey but could not recall the address of the facility or even the town. See id. at 118. Michele also did not know why her company began using Clean Earth:

Q: How did you find out about Clean Earth transfer station?

A: I don’t know who told me. I just . . .

Q: Do you know when you first started using Clean Earth as a transfer station?

A: No.

Q: If you know, do you know any other companies that use Clean Earth?

⁴ A transfer station is the location licensed by the New York City Department of Sanitation where a trade waste carting company disposes of the material it collects from a construction site or other commercial waste generator.

A: I don't know, no.

* * *

Q: You testified earlier that you also used Tilcon transfer station or recycling center. Where is that located?

A: They're in Pennsylvania.

Q: Pennsylvania. Do you know what town it's in?

A: No.

Id. at 123, 124-25.

Michele also did not know how much Tilcon or T.R.C. transfer station charged per load. See id. at 121. Michele first stated that T.R.C. was in New Jersey, but later stated T.R.C. was in Pennsylvania. See id. at 124. She further testified that her company does not use any transfer stations in New York. When asked if there were a reason Green Earth uses transfer stations in Pennsylvania, she answered, "No reason, no." See id. at 125.

The belief that Michele Pierce is not the sole principal of the Applicant is further supported by her answers to questions relating to the hiring of drivers. She testified at the First Sworn Interview that she hired the drivers for Green Earth. See id. at 103. However, during a stop of a truck registered to Green Earth that was engaging in unregistered trade waste removal activity, the driver of the truck told an investigator from the Commission that he had never seen or heard of Michele Pierce. That incident is recounted below in the section regarding the unregistered trade waste activity of Green Earth and its principals.

3. Incidents of Unregistered Trade Waste Removal Activity

The Applicant has repeatedly engaged in unregistered trade waste removal activity. As noted immediately above, on June 28, 2012, a Commission investigator observed a dump truck without Commission-issued license plates transporting trade waste in the Bronx, specifically excavated dirt and rock.⁵ The truck had the following information painted on its doors: "B&M Trucking, 42-44 Ave. C, Newark, NJ." The truck was registered to Green Earth at the same address indicated on the truck's doors. However, the insurance for the truck indicated that it was owned by Green Earth with an Allentown, Pennsylvania address that matches the residence of Michele and Michael Pierce. The truck's driver provided the Commission investigator with a manifest that had Green Earth's logo at the top and a job site address in the Bronx. The Commission investigator found that neither B&M Trucking nor Green Earth were licensed by or registered with the Commission. The Commission investigator issued Notice of Violation ("NOV") TW# 8759 for Unlicensed Activity, and the Applicant subsequently paid a \$2,500 fine. See Stipulation of Settlement TW# 8759, signed by Michele Pierce, October 19, 2012.

⁵ All trucks that transport waste for all licensees and registrants of the Commission must have license plates issued by the Commission affixed to them on both sides.

On June 18, 2014, a Commission investigator observed a truck with “Green Earth” signs affixed on both sides of the vehicle transporting excavated dirt and rock in Brooklyn, New York, without Commission-issued license plates. The truck was registered to Green Earth at 42-44 Ave. C in Newark, New Jersey and was insured by Green Earth at the Pierces’ Allentown address. The truck’s driver told the Commission investigator that he had collected the trade waste from an excavation site in Brooklyn and would be transporting it to the Clean Earth transfer station in Carteret, New Jersey. The Commission investigator issued NOV TW# 210375 for Unlicensed Activity, and the Applicant subsequently paid a \$2,500 fine. See Stipulation of Settlement TW# 210375, signed by Michele Pierce, November 3, 2014.

In July 2015, Michele Pierce appeared at the Commission for the Second Sworn Interview, during which she was asked about the two trade waste violations. Michele acknowledged receiving the two violations and paying the subsequent fines. See Second Sworn Interview Tr. at pp. 28, 31. She further stated that Green Earth continues to transport trade waste from large job sites within New York City without Commission authorization. See id. at 15. When asked for further details regarding on-going projects in which Green Earth is transporting trade waste without a license or registration, Michele referred to a project called the “Siphon Project,” a tunnel construction job in Staten Island. See id. at 16-19. She also referenced an on-going project on Fulton Street in Manhattan, although she could not explain the details of the project. In fact, when asked whether that project entails a building that is being built or is being torn down, Michele said she was “drawing a blank.” Id. at 20. The Commission directed Michele to provide invoices for these two on-going jobs. A review of those invoices corroborates Michele’s statement and shows that Green Earth has billed over \$365,000 for these two projects.

Basis of Denial

1. The Applicant Failed to Disclose Michael Pierce as a Principal.

“The [C]ommission may . . . refuse to issue a license to an applicant who lacks good character, honesty and integrity. . . . In making such determination, the [C]ommission may consider . . . failure by such applicant to provide truthful information in connection with the application.” Admin. Code § 16-509(a)(i). The Commission may also refuse to issue a license or registration to any applicant who has “knowingly failed to provide information or documentation required by the Commission . . . or who has otherwise failed to demonstrate eligibility for a license.” Id. at § 509(b). See also Elite Demolition Contracting Corp. v. The City of New York, __ N.Y.S.2d __, 125 A.D.3d 576 (1st Dep’t 2015); Breeze Contracting Corp. v. The City of New York, 52 A.D.3d 424 (1st Dep’t 2008); Attonito v. Maldonado, 3 A.D.3d 415 (1st Dep’t) (Commission may deny an application for an exemption “where the applicant fails to provide the necessary information, or knowingly provides false information”); leave denied 2 N.Y.3d 705 (N.Y. 2004).

The credible evidence in this matter demonstrates that Michael Pierce is an undisclosed principal of the Applicant. The definition of “principal” includes corporate officers and directors, all stockholders holding ten percent or more of the outstanding shares of the corporation and all other persons participating directly or indirectly in the control of such business entity. See Admin. Code §16-501(d). Michele Pierce’s testimony in her sworn interviews with the Commission demonstrates that she does not have specific substantive knowledge of the details regarding the

Applicant's business operations. Rather, it is Michael Pierce who has the knowledge and experience to control the operations of the business and who does, in fact, do so.

The Applicant disclosed that Michele Pierce is not only the sole principal, she is the sole employee. The Applicant has disclosed no bookkeeper, dispatcher or any other individual who would assist with the operations and administration of the business. Yet, Michele did not know the street addresses or even counties of Green Earth's projects or the locations of the transfer stations it uses. She did not know why, of all the transfer stations to choose from, Green Earth uses the ones that it does. She did not know what the T.R.C. and Tilcon transfer stations charge. While Michele testified that she hired a particular driver, that driver told a Commission investigator that he had never heard of Michele and that his boss is Michael Pierce. This information is not surprising given Michael Pierce's experience in the commercial waste hauling industry from his time as the principal at Global. Michele herself testified that Michael makes phone calls and visits job sites, bringing paperwork and manifests.

Thus, the evidence demonstrates that Michael Pierce, rather than Michele, actually controls Green Earth. It is reasonable to conclude that Michael Pierce allowed Global's Commission-issued registration to expire due to the La Barbera litigation, and that he established Green Earth as a successor company so that he could continue to work in the trade waste removal industry. Green Earth filed the Application with the Commission in August 2009, just four months before Global's Commission-issued registration expired. Tellingly, Michael Pierce was listed as the original sole principal of the Applicant, but he was later replaced by Michele. The intentional omission of Michael Pierce as a principal, or even an employee, demonstrates a lack of good character, honesty and integrity. The Applicant has not disputed these assertions. Accordingly, the Commission denies the Instant Application based on this independently sufficient ground.

2. The Applicant Has Engaged in Unregistered Trade Waste Removal Activity.

"It shall be unlawful for any person to operate a business for the purpose of the collection of trade waste from the premises of a commercial establishment required to provide for the removal of such waste . . . or to engage in, conduct or cause the operation of such business, without having first obtained a license therefor from the [C]ommission." Admin. Code § 16-505(a). In addition, the "[C]ommission may . . . refuse to issue a license to an applicant who lacks good character, honesty and integrity." *Id.* at § 16-509(a).

The Commission issued two violations for unregistered activity to Green Earth, one in 2012 and one in 2014. Green Earth admitted culpability with respect to both violations and paid significant fines. During the Second Sworn Interview, Michele testified that, not only has Green Earth engaged in unlicensed activity in the past, but it was also operating as an unregistered trade waste removal business at the time of the interview. She disclosed the Staten Island Siphon Project and the Fulton Street project as specific and ongoing jobs. Her testimony was corroborated by invoices, on Green Earth letterhead, that Green Earth billed two construction companies approximately \$365,000 for removing trade waste from those companies' job sites within New York City and transporting the trade waste to transfer stations.

Thus, there is substantial evidence demonstrating that Green Earth is performing trade waste removal activity in the City of New York without the required authorization from the

Commission. Moreover, this flagrant and continuing disregard for the law demonstrates a lack of good character, honesty and integrity. The Applicant has not disputed these assertions. Accordingly, the Commission denies the Instant Application based on this independently sufficient ground.

3. The Applicant and Its Undisclosed Principal Are Parties to a Civil Lawsuit relating to the Trade Waste Industry and a Substantial Unpaid Judgment.

“The [C]ommission may . . . refuse to issue a license to an applicant who lacks good character, honesty and integrity. . . . In making such determination, the [C]ommission may consider . . . a pending civil . . . 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” Admin. Code § 16-509(a)(ii). In addition, the Commission may consider the “failure to pay any tax, fine, penalty, fee related to the applicant’s business . . . for which judgment has been entered by a court or administrative tribunal of competent jurisdiction.” *Id.* at § 16-509(a)(x).

Michael Pierce’s prior company, Global, is a defendant in the La Barbera Litigation. In that matter, Global is alleged to have withheld funds from a union local. Global was registered with the Commission and engaged in the removal of trade waste. Michael Pierce was the principal of Global, and he is a principal of the Applicant, albeit undisclosed. Thus, the La Barbera Litigation directly relates to the fitness of the Applicant and its principal to conduct business in the trade waste industry. That litigation is still on-going, as the plaintiffs attempt to obtain discovery from the defendant in order to collect on the judgment. The judgment against Global demonstrates a lack of good character, honesty and integrity under Administrative Code § 16-509(a)(ii) on the part of Global and its principal, who is also a principal of the Applicant.

Moreover, there is an outstanding judgment against Global from the La Barbera Litigation in the amount of \$542,262.24, plus interest. This fact demonstrates a lack of business integrity under Administrative Code § 16-509(a)(x). The Applicant has not disputed these assertions. Accordingly, the Commission denies the Instant Application based on this independently sufficient ground.

Conclusion

The Commission is vested with broad discretion to issue a license or refuse to grant an exemption from the license requirement and issue a registration in lieu of a license to any applicant who it determines to be lacking in good character, honesty and integrity. The record as detailed above demonstrates that the Applicant lacks those qualities. Accordingly, based on the three independently sufficient grounds set forth herein, the Commission denies the Applicant’s exemption application.

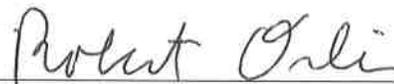
This denial decision is effective immediately. Green Earth Solutions, Inc. may not operate as a trade waste business in the City of New York.

Dated: November 9, 2015

THE NEW YORK CITY
BUSINESS INTEGRITY COMMISSION



Daniel D. Brownell
Commissioner and Chair



Deputy Commissioner Robert Orlin
(Designee)
Department of Sanitation



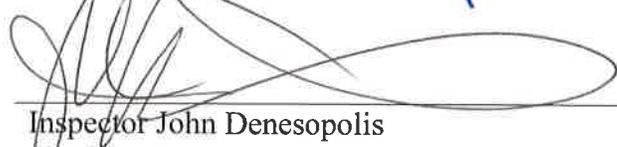
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