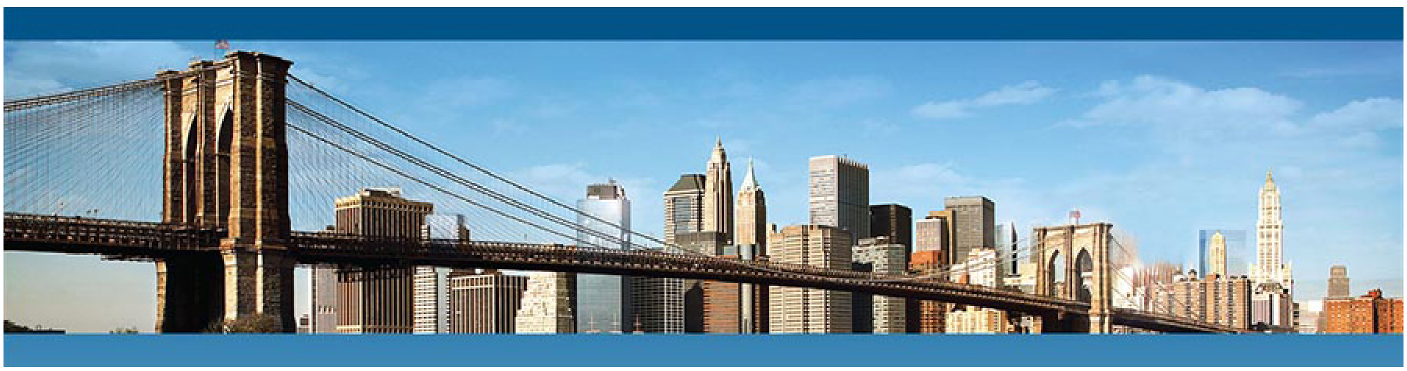
City of New York

OFFICE OF THE COMPTROLLER

Scott M. Stringer
COMPTROLLER



AUDITS AND SPECIAL REPORTS

Marjorie Landa

Deputy Comptroller for Audit

Audit Report on the Tax Classification of Real Property in the Borough of Staten Island by the New York City Department of Finance

SR17-084A

February 24, 2017

http://comptroller.nyc.gov

THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
1 CENTRE STREET
NEW YORK, NY 10007

SCOTT M. STRINGER
COMPTROLLER

February 24, 2017

To the Residents of the City of New York:

My office has audited the New York City Department of Finance (DOF) to determine whether it has adequate procedures in place to ensure that properties in the borough of Staten Island classified as Tax Class 1 are correctly classified. We audit City agencies such as DOF as a means of increasing accountability and ensuring that City resources are used effectively, efficiently and in the best interest of the public.

Based on our exterior inspections of properties listed by DOF as Class 1 mixed-use on the May 2016 assessment rolls, we preliminarily identified 28 out of 943 properties listed as Tax Class 1 that appeared to be misclassified. Following notification of our preliminary findings, DOF requested our list of the 28 properties that appeared to be misclassified. DOF assessors then performed interior inspections, interviewed tenants and/or employees, and confirmed that 12 of the 28 properties should be reclassified. DOF determined that the remaining 16 properties do not require reclassification. While DOF had inspected 4 of the 12 reclassified properties prior to our inspections, the assessors did not recommend changes in the tax and building classifications of any of the 4 properties. Using DOF's guidelines, we calculated that changing the tax classification of the 12 properties would result in an additional $86,599 in taxes after the increases phase in over the required five-year period.

Based on the audit, we made the following three recommendations: (1) DOF should ensure that property tax classification changes recommended by their assessors are implemented by the next tax year; (2) DOF should determine why their inspectors did not recommend that the classifications of these properties be changed and enhance their training to address any issues identified; and (3) DOF should consider enhancing its oversight and quality assurance functions to ensure proper classification of properties.

The results of the audit have been discussed with DOF officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

If you have any questions concerning this report, please e-mail my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,

Scott M. Stringer

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THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
AUDITS AND SPECIAL REPORTS

Audit Report on the Tax Classification of Real Property in the Borough of Staten Island by the New York City Department of Finance

SR17-084A

EXECUTIVE SUMMARY

This audit of the New York City Department of Finance (DOF) was conducted to determine whether DOF's procedures ensure that mixed-use properties in the borough of Staten Island classified as Tax Class 1 are correctly classified. In accordance with the *New York City Real Property Tax Law* (RPTL), DOF classifies every parcel of property in New York City for real-estate purposes. These tax classes are as follows:

- *Class 1:* Consists of residential properties with three or fewer units and "Mixed Commercial/Residential Use" (mixed-use) properties with three or fewer residential and commercial units, where 50 percent or more of the space is used for residential purposes.

- *Class 2:* Includes all other primarily residential properties that are not designated Class 1. Class 2 also has three sub-classes:

    - Class 2a for a 4-to-6 unit rental building;

    - Class 2b for a 7-to-10 unit rental building; and

    - Class 2c for a 2-to-10 unit cooperative or condominium.

- *Class 3:* Includes real estate of utility corporations and special franchise properties, excluding land and certain buildings.

- *Class 4:* Includes all other properties, such as stores, warehouses, hotels, office buildings, and any vacant land not classified as Class 1.

Properties are assessed at a percentage of their full market value based on their classifications. Class 1 properties are assessed at six percent of market value and Class 2, 3, and 4 properties are assessed at 45 percent. Real property is also identified by its "building class," which reflects the property type and primary use, such as one-family, one-story residential property or a mixed-use multifamily residential property with four residential units and a store or office.

Audit Findings and Conclusion

Based on our exterior inspections of properties listed by DOF as Class 1 mixed-use on the May 2016 assessment rolls, we preliminarily identified 28 out of 943 properties listed as Tax Class 1 that appeared to be misclassified. Following notification of our preliminary findings, DOF requested our list of the 28 properties that appeared to be misclassified. DOF assessors then performed interior inspections, interviewed tenants and/or employees, and confirmed that 12 of the 28 properties should be reclassified. DOF determined that the remaining 16 properties do not require reclassification. While DOF had inspected four of the 12 reclassified properties prior to our inspections, the assessors did not recommend changes in the tax and building classifications of any of the four properties.

Using DOF's guidelines, we calculated that changing the tax classification of the 12 properties would result in an additional $86,599 in taxes after the increases phase in over the required five-year period.

Audit Recommendations

Based on the audit findings, we make the following three recommendations:

- DOF should ensure that property tax classification changes recommended by their assessors are implemented by the next tax year.
- DOF should determine why their inspectors did not recommend that the classifications of these properties be changed and enhance their training to address any issues identified.
- DOF should consider enhancing its oversight and quality assurance functions to ensure proper classification of properties.

Agency Response

We received a written response from DOF officials on February 17, 2017. In its response, DOF generally agreed with the audit's recommendations and indicated that it would address the issues identified.

Further, the agency stated, "All of the lots provided by the City Comptroller's office have been inspected by assessing staff and those requiring a change in tax classification have been reclassified in the Computer Assisted Mass Appraisal application."

AUDIT REPORT

Background

DOF assesses the value of all New York City properties, collects property taxes and other property-related charges, maintains property records, administers exemptions and abatements and collects unpaid property taxes and other property-related charges through annual lien sales. In accordance with the RPTL, DOF classifies every parcel of property in New York City for real-estate purposes.[1] These tax classes are as follows:

- *Class 1:* Consists of residential properties with three units or less and “Mixed Commercial/Residential Use” (mixed-use) properties (with three or fewer residential and commercial units) where 50 percent or more of the space is used for residential purposes. This class includes primarily residential property such as one, two, and three-family homes, condominiums of three stories or less that were originally built as condominiums; and condominiums of three dwelling units or less that were previously one, two, and three-family homes and certain vacant land zoned for residential use outside of Manhattan.

- *Class 2:* Includes all other primarily residential properties that are not designated Class 1. This includes co-ops but does not include hotels, motels, or other similar property. Class 2 also has three sub-classes: Class 2a for a 4-to-6 unit rental building; Class 2b for a 7-to-10 unit rental building; and Class 2c for a 2-to-10 unit cooperative or condominium.

- *Class 3:* Includes real estate of utility corporations and special franchise properties, excluding land and certain buildings.[2]

- *Class 4:* Includes all other properties, such as stores, warehouses, hotels, office buildings, and any vacant land not classified as Class 1.

Properties are assessed at a percentage of their full market value based on their tax classifications. Class 1 properties are assessed at six percent of market value and Class 2, 3, and 4 properties are assessed at 45 percent. Increases to assessed values for Tax Class 1 are limited to six percent per year, and no more than 20 percent over five years. Increases to Tax Classes 2a, 2b, and 2c are limited to eight percent per year, and no more than 30 percent over five years. Increases to Class 2 properties with more than 10 units and Class 4 properties are generally phased in over a five-year period. If the property owner makes physical changes to the property, the phase-in cap does not apply and the full value of the improvements is applied.

DOF’s Property Division is responsible for producing a fair, accurate, and legal assessment roll each year. DOF’s assessors value properties by verifying that they are assigned to the correct building class and tax class; that the physical characteristics of the building, including the square footage, have been recorded accurately; and that the properties are valued in accordance with assessment roll guidelines and general appraisal rules.

[1] Real property is also identified by its “building class,” which reflects the property type and primary use, such as one family one story residential property or a mixed-use multifamily residential property with four residential units and a store or office.
[2] Special franchise properties are those situated in, under, above, upon or through any public street, highway, water, or other public place.

Assessors must physically visit a property once every three years. DOF is in the third year of a three year administrative inspection cycle for such visits. DOF has an *Administrative Inspection Project Instruction* manual that sets forth instructions for assessors on how they are to conduct inspections, known as "administrative inspections."[3] In advance of these administrative inspections, assessors receive a form with data about each property, including tax class and building class. The assessor must make notes and photograph the property if the property data on the form does not match their field observations. The inspection results are recorded in DOF's computer-assisted mass appraisal system, VISION. If an assessor enters any basic property information about the parcel that does not agree with City records, the assessor records an "X" in the "Re-Visit" column and a brief note to explain why a re-visit is recommended.

During Fiscal Year 2016, DOF collected $23.18 billion in property taxes. According to DOF records, there were 1,103,323 taxable properties, consisting of 708,577 Class 1 properties, 278,925 Class 2 properties, 4,592 Class 3 properties, and 111,229 Class 4 properties in New York City.

Objective

The objective of this audit was to determine whether mixed-use properties in the borough of Staten Island classified as Tax Class 1 have been given the correct building and tax classifications by DOF.

Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit covered properties in the borough of Staten Island that DOF classified as mixed-use properties in Tax Class 1 on its Final Assessment Roll as of May 2016. Please refer to the Detailed Scope and Methodology at the end of this report for the specific procedures and tests that were conducted.

Discussion of Audit Results

The findings in this report were discussed with DOF officials during and at the conclusion of this audit. A preliminary draft was sent to DOF officials and discussed at an exit conference held on January 31, 2017. On February 3, 2017, we submitted a draft report to DOF officials with a request for comments.

We received a written response from DOF on February 17, 2017. In that response, DOF generally agreed with the audit's recommendations and indicated that it would address the issues identified. Further, the agency stated, "All of the lots provided by the City Comptroller's office have been

[3] DOF's Administrative Inspection Project briefing defines an administrative inspection as "an exterior inspection used to check the reasonableness of basic property data (e.g., Building Class, Number of Residential and Commercial Units, Number of Stories) of contiguous parcels located on blocks."

inspected by assessing staff and those requiring a change in tax classification have been reclassified in the Computer Assisted Mass Appraisal application."

FINDINGS AND RECOMMENDATIONS

Of the 943 mixed-use properties in Staten Island identified as Tax Class 1 as of May 2016, we preliminarily identified 28 properties that appeared to have been misclassified with the incorrect tax and building classification, based on our external observations of the properties. DOF requested a list of the properties that appeared to be misclassified. DOF assessors then performed interior inspections, interviewed tenants and/or employees, and confirmed that 12 of the 28 properties should be reclassified. However, DOF determined that the remaining 16 properties do not require reclassification. While DOF had inspected four of the 12 reclassified properties prior to our inspections, the assessors did not recommend changes in the tax and building classifications of any of the four properties based on those earlier inspections. Using DOF guidelines, we calculated that changing the tax classification of the 12 properties we identified as improperly classified would result in an additional $86,599 in taxes after increases phase in over the required five-year period.

Improper Tax Classification of Mixed-Use Properties

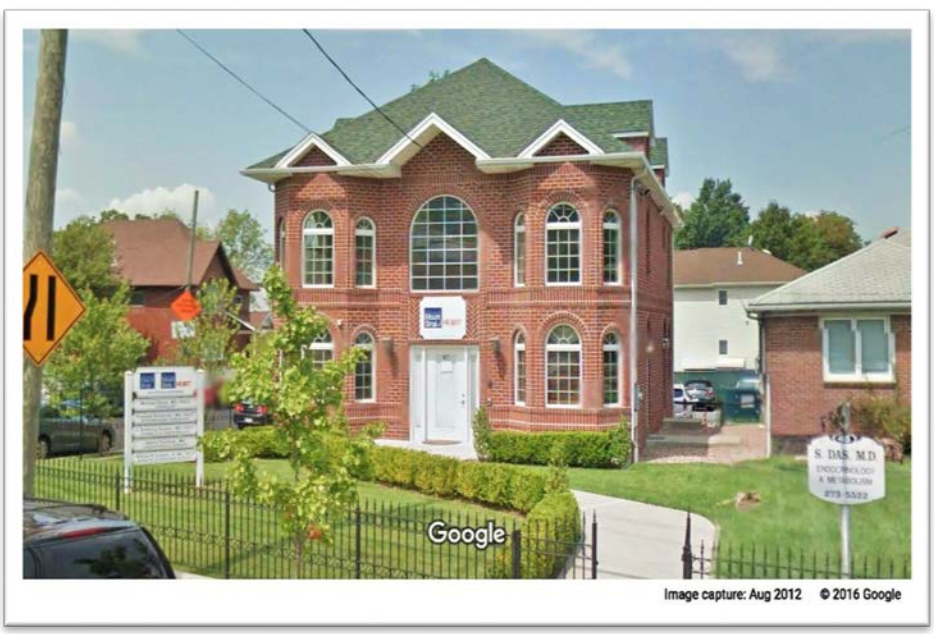
Through physical inspections conducted in October 2016 of mixed-use properties in Staten Island, auditors identified and DOF agreed that ten properties had more than 50 percent of their total square footage used for a commercial purpose, which necessitated changes in their tax and building classifications.[4] However, although DOF had inspected two of these same properties prior to our inspections, the DOF assessors did not at that time recommend any change in tax and building classifications. It was only after re-inspections prompted by our preliminary findings that DOF inspectors went back and determined that the properties should be reclassified.

For example, both DOF and the auditors visited a two-story building with BBL 5, 662, 32. That building was listed on the assessment rolls as a “Primarily 1 Family with 1 Store or Office” (Tax Class 1, Building Class S1).[5] Our external inspection, as shown in the picture below, found that a medical center appeared to occupy more than 50 percent of the property’s square footage. A DOF assessor visited this site on January 21, 2016 and did not indicate in VISION that a change to the tax class and building class was required, nor do the assessor’s notes indicate that a revisit was required.

During November 2016, DOF inspected this property an additional time due to our preliminary findings. Based on this second DOF inspection, it changed the tax and building classifications of this particular property, BBL 5, 662, 32, to “Office with Apartments Only (No Comm)” (Tax Class 4, Building Class O8). However, given the timing of change, for Fiscal Year 2017, DOF incorrectly assessed the owner of this property $8,741 in property taxes based on the old incorrect classification, rather than $12,038 based on the appropriate Tax Class 4 classification.

[4] We also identified two properties classified as one or two family homes that were in fact an income producing rental building with four to six units. This finding is discussed in a separate section of this report below.
[5] DOF assigns properties that are mixed-use an “S” code in the building classification.

This picture above was taken during our visit on October 19, 2016. However, a picture of this same property on Google maps dated August 2012 clearly shows the same medical center apparently operating on the property at least four years prior to our visit. The picture contained in Google maps is shown below.



Similarly, a two-story building with BBL 5, 3350, 28, was listed on the assessment rolls as a "Primarily 2 Family with 1 Store or Office" (Tax Class 1, Building Class S2). Our external inspection revealed that the property had a cleaning service business on the first floor and a real estate office located on the second floor. A DOF assessor had previously visited this site on

February 8, 2016, but did not at that time indicate in VISION that changes to the tax class and building class was required, nor do the assessor's notes indicate that a revisit was required.

Prompted by our preliminary audit findings, DOF re-inspected this property in November 2016 and thereafter changed the classification of this property to "Multi-Story Retail Building" (Tax Class 4, Building Class K2). However, given the timing of change, for Fiscal Year 2017, we note that DOF incorrectly assessed the owner of this property $5,601 in property taxes due based on the old incorrect classification rather than $12,467 based on the appropriate Tax Class 4 classification.

The picture above was taken of the location during our visit on October 19, 2016. Google Maps also features a picture of this property dated May 2012 that shows the same businesses apparently operating at that time in this location. It would appear this property has been incorrectly assessed for at least four years prior to our October 2016 visit. The picture contained in Google Maps is shown below.

Improper Building and Tax Classification of Other Class 1 Properties

Our inspections identified and DOF agreed that two properties had been incorrectly classified as either one or two-family home with one store. Specifically, during our inspections, we identified a three story building with BBL 5, 209, 55 listed on the assessment rolls as a “Primarily 2 Family with 1 Store or Office” (Tax Class 1, Building Class S2). During May 2015, DOF assessors had inspected this property, but did not at that time request that it be re-inspected for a possible change in tax and building classifications. The auditor’s inspection found that the property had three businesses on the first floor and two apartments above. After informing DOF of this preliminary finding, the department re-inspected this property on November 10, 2016, and changed the classification to “Single or Multiple Dwelling with Stores or Offices (Tax Class 2A, Building Class S9). For Fiscal Year 2017, DOF assessed the owner of this property $2,736 in property taxes due based on its old erroneous classification rather than $4,291 based on the appropriate Tax Class 2A classification.

The picture above was taken of the location during our visit on October 19, 2016. Google Maps has a picture of this property dated September 2007. Based on the Google Maps picture and our current observations, it appears that the use of the property has not changed in at least the past 9 years and the City has been incorrectly classifying this property since at least that time. The picture contained in Google Maps is shown below.

Recommendations

1. DOF should ensure that property tax classification changes recommended by their assessors are implemented by the next tax year.

   DOF Response: *"*DOF partially agrees. Assessors may indicate a potential reclassification is required when conducting survey field work. The documentation they return to supervisors must first be reviewed and additional inspections scheduled before rushing to reclassify parcels based solely on an exterior inspection. Otherwise many owners of the 28 parcels provided by auditors would have been unfairly burdened with tax class change. DOF agrees that change recommendations that result in reclassification be conducted in a timely manner. In most cases, the change is implemented by the next tax year."

2. DOF should determine why their inspectors did not recommend that the classifications of these properties be changed and enhance their training to address any issues identified.

   DOF Response: "DOF partially agrees. Of the 28 properties identified by auditors fewer than half required a change in tax classification. This illustrates the complexity of identifying predominant use from a street-level inspection. Assessors are unlikely to recommend a change in classification without definitive evidence to justify that change. DOF has a responsibility to the public to ensure that a potential increase in tax liability is warranted.

   Assessors are required to be New York State certified and this certification process includes a field component. In 2015 the Chief Review Assessor designed a Data Collection course which was approved by the New York State Office of Real Property Tax Services. The inspection and classification of real property is the primary focus of the course which was offered for the first time in 2015. The Property Division will continue to work with assessing staff to develop skills in this area. Additional classes have already been held in the spring and summer of 2016."

3. DOF should consider enhancing its oversight and quality assurance functions to ensure proper classification of properties.

   DOF Response: "DOF agrees. Real estate in New York City is dynamic and constantly changing. This is particularly true for Staten Island mixed-use properties. DOF strives to continually update property records and maintain a high level of quality.

   In an effort to strengthen quality assurance functions, supervisors and assessor managers will be implementing additional field and in-office reviews to ensure the proper classification of real property. The Quality Assurance group will also coordinate sampling of field work to identify errors and potential training needs."

DETAILED SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope period of this audit covers properties in Staten Island that DOF classified as mixed-use in Tax Class 1 on DOF's Final Assessment Roll as of May 2016.

To achieve our audit objective, we reviewed DOF's *NYC Residential Property Taxes Guidelines for Tax Class 1 and Tax Class 2 Properties* and *Fiscal Year 2017 Guidelines for Properties Valued*. We also reviewed the tax rates for each class of real property in Fiscal Year 2017 and DOF's procedures to calculate the real estate taxes. To gain an understanding of the regulations governing the classification of real property and DOF's procedures for ensuring that properties are correctly classified, we confirmed the Building Classification Process with DOF's Deputy Director of Property Quality Assurance Division. The conversations were documented in a memorandum. We used *New York City Administrative Code §11-207 – Duties of Assessors in Assessing Property* and *New York Real Property Tax Law §1802 – Classification of Real Property in a Special Assessing Unit* as audit criteria for assessing and classifying real properties.

We reviewed DOF's *Final Assessment Rolls* (AVRoll) for Fiscal Year 2017, published in May 2016, that we obtained from DOF's website. We extracted all one-story to three-story mixed-use properties in Tax Class 1 in the borough of Staten Island. As of May 2016, there were 943 one to three-story mixed-use properties listed as Tax Class 1. Based on our research using Google Visual Tour, we identified 47 potentially misclassified properties. We relied on our physical observations to test the accuracy and completeness of the AVRoll.

We reviewed the DOF's AVRoll to confirm the building classification of the 47 potential misclassified properties. We then visited each property to physically observe whether they were properly classified. Of the 47 properties we visited, 19 appeared to be misclassified. During our visits, we identified another nine properties that appear to be misclassified. We verified each building classification by reviewing its Individual Assessment Roll. Upon review of our photographs and notes taken during our observations, we determined that 28 properties preliminarily appeared to be misclassified. DOF requested and were provided with a list of the 28 properties prior to completing our analysis.

We received DOF's result of the inspections for the 28 properties on December 7, 2016. We then reviewed DOF's results and estimated the amount of additional tax due based on property tax class and the market value provided by DOF, and the appropriate property tax rate for Fiscal Year 2017.

DOF used the VISION system to process the full detailed evaluation on the assessed properties. To determine if DOF's Administration Inspection Project results had been properly documented, we subsequently reviewed the Visit History and Property Notes of the 28 mixed-use properties for the date of inspection, inspection type, and the inspection result in DOF's VISION system. We also reviewed DOF's inspection results on the 12 properties that its assessors determined required reclassification, out of the 28 we had previously found. We compared DOF's inspection result to the result from our visits. We reviewed DOF's Instructions for Field Valuation for the inspection procedures, and also reviewed DOF's inspection result for the remaining 16 properties that the department stated needed no changes in classification.

Department of Finance

Property Division
Property Valuation & Mapping Office
66 John Street, 12th Floor
New York, NY 10038

Timothy Sheares
Deputy Commissioner
ShearesT@Finance.nyc.gov

February 17, 2017

Ms. Marjorie Landa
Deputy Comptroller for Audit
Office of the City Comptroller
1 Centre Street, 11th Floor
New York, NY 10007

Re: Audit Report on the Tax Classification of Real Property in the Borough of Staten Island by the New York City Department of Finance (SR17-084A)

Dear Deputy Comptroller Landa,

Introduction

The Department of Finance (DOF) appreciates the Comptroller's findings that out of 943 Tax Class 1 mixed-use properties in Staten Island, 12 were improperly classified. All of the lots provided by the City Comptroller's office have been inspected by assessing staff and those requiring a change in tax classification have been reclassified in the Computer Assisted Mass Appraisal application.

Background

In general, the Department of Finance Property Division inspects thousands of parcels each year which have filed for a construction permit with the Department of Buildings. Other inspections include neighborhood surveys, special projects and taxpayer-initiated inspections from *Requests to Update* form submissions.

In the spring of 2015 DOF initiated an Administrative Inspection Project to visit all parcels citywide. In this first year more than 300,000 parcels were seen by assessing staff. This was made possible by the addition of new assessing staff hired over the past several years. It should be noted however that due to the Principal of Change, a margin of error will permanently exist in real estate. The International Association of Assessing Officers (IAAO) defines the Principal of Change in real estate as "the market value is never constant because physical, economic, governmental, and social forces are at work to change the property and its environment."

TC1 mixed-use properties represent a relatively small portion of all parcels citywide. Their use can vary over time and their classification can be difficult to establish with an exterior inspection. There are other considerations outside of business signs which assessors must take into account before reclassifying a property. This is illustrated in the auditors' own field work that of 28 parcels originally identified in the preliminary findings, only 12 were actual cases of misclassification.

The predominant active use, which determines the classification of a property, is determined by square footage. Although a review of Certificates of Occupancy provides for some information on permissible use, an interior inspection may be necessary to establish the actual commercial and residential square footage before reclassification. Gaining access to these properties is often difficult and several attempts are required.

An example to illustrate this complexity is a three-story building which has retail on the first floor and a business sign mounted on the second story. While the second story is fully residential, from the street level it may appear to be a business. This observation is not definitive and cannot be used alone to reclassify a parcel. Internal inspections, speaking with tenants or neighbors as well as researching various records (such as filed RPIEs) may be required.

Responses to Recommendations

1. **DOF should ensure that property tax classification changes recommended by their assessors are implemented by the next tax year.**

DOF partially agrees.

Assessors may indicate a potential reclassification is required when conducting survey field work. The documentation they return to supervisors must first be reviewed and additional inspections scheduled before rushing to reclassify parcels based solely on an exterior inspection. Otherwise many owners of the 28 parcels provided by auditors would have been unfairly burdened with tax class change. DOF agrees that change recommendations that result in reclassification be conducted in a timely manner. In most cases, the change is implemented by the next tax year.

2. **DOF should determine why their inspectors did not recommend that the classifications of these properties be changed and enhance their training to address any issues identified.**

DOF partially agrees.

Of the 28 properties identified by auditors fewer than half required a change in tax classification. This illustrates the complexity of identifying predominant use from a street-level inspection. Assessors are unlikely to recommend a change in classification without definitive evidence to justify that change. DOF has a responsibility to the public to ensure that a potential increase in tax liability is warranted.

Assessors are required to be New York State certified and this certification process includes a field component. In 2015 the Chief Review Assessor designed a Data Collection course which was approved by the New York State Office of Real Property Tax Services. The inspection and classification of real property is the primary focus of the course which was offered for the first time in 2015. The Property Division will continue to work with assessing staff to develop skills in this area. Additional classes have already been held in the spring and summer of 2016.

3. **DOF should consider enhancing its oversight and quality assurance functions to ensure proper classification of properties.**

DOF agrees.

Real estate in New York City is dynamic and constantly changing. This is particularly true for Staten Island mixed-use properties. DOF strives to continually update property records and maintain a high level of quality.

In an effort to strengthen quality assurance functions, supervisors and assessor managers will be implementing additional field and in-office reviews to ensure the proper classification of real property. The Quality Assurance group will also coordinate sampling of field work to identify errors and potential training needs.

Sincerely,

Timothy Sheares, Deputy Commissioner

cc: Michael Hyman, First Deputy Commissioner
Carmela Quintos, Assistant Commissioner
Sam Mayer, Senior Director, Internal Audit