



The City of New York
BUSINESS INTEGRITY COMMISSION
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**FINAL DETERMINATION OF THE BUSINESS INTEGRITY COMMISSION THAT
MAXWELL MILES WILSON LACKS THE REQUISITE GOOD CHARACTER,
HONESTY AND INTEGRITY TO BE EMPLOYED OR ENGAGED AS AN AGENT BY
LICENSEES OF THE BUSINESS INTEGRITY COMMISSION**

I. *Introduction*

Action Carting Environmental Services Inc. (“Action Carting”) – which holds a trade waste license issued by the Business Integrity Commission (the “Commission”) – disclosed Maxwell Miles Wilson (“Wilson”) as an Employee/Agent when he filed an Employee/Agent Disclosure Form with the Commission on September 10, 2025. *See* Employee/Agent Disclosure Form of Maxwell Miles Wilson (the “Disclosure Form”). On the Disclosure Form, which Wilson certified as true, Wilson failed to disclose his entire criminal history and failed to disclose his membership in an organized crime group.

The Commission designated David Mandell, Associate Commissioner for Legal Affairs and Deputy General Counsel, to review the findings of Wilson’s background investigation. On or about March 6, 2026, Wilson was served with a “Notice of the Initial Conclusion That He Lacks Requisite Good Character, Honesty and Integrity to be Employed or Engaged as an Agent by Licensees of the Business Integrity Commission” (the “Initial Conclusion”). *See* Initial Conclusion. The Initial Conclusion included a full discussion of the basis of the Initial Conclusion, and notified Wilson that he could respond to the Initial Conclusion in writing or in person. *See id.* Wilson did not respond to the Initial Conclusion.

On or about March 25, 2026, the Commission served Wilson with a Notice of the Final Conclusion That He Lacks the Requisite Good Character, Honesty and Integrity to be Employed or Engaged as an Agent by Licensees of the Business Integrity Commission (the “Final Conclusion”). *See* Final Conclusion. The Final Conclusion included a full discussion of the basis of the Final Conclusion, and notified Wilson that he could respond to the Final Conclusion. *See id.* Wilson did not respond to the Final Conclusion.

We have carefully reviewed the Final Conclusion. Wilson's lack of a response to the Final Conclusion left the facts in the Final Conclusion uncontested. As fully set forth below, we conclude that Wilson lacks the requisite good character, honesty and integrity necessary to be employed by a licensee in the trade waste industry based on the following independently sufficient grounds:

- A. Wilson provided false and misleading information to the Commission on his Disclosure Form; and**
- B. Wilson has a lengthy criminal history and is a member of an organized crime group.**

II. 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. 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. International Brotherhood of Teamsters (Adelstein)*, 998 F.2d 120 (2d Cir. 1993); *People v. Ass'n of Trade Waste Removers of Greater New York Inc. et al.*, Indictment No. 5614/95 (Sup. Ct. N.Y. Cty.); *United States v. Mario Gigante et al.*, No. 96 Cr. 466 (S.D.N.Y.); *People v. GNYTW*, 701 N.Y.S.2d 12 (1st Dep't 1999).

The Commission is charged with, *inter alia*, combating the pervasive influence of organized crime and preventing its return to the City's private carting industry. Instrumental to this core mission is the licensing scheme set forth in Local Law 42 of 1996, which created the Commission and granted it the power and duty to license and regulate the trade waste removal industry in New York City. *See* Title 16-A, New York City Administrative Code ("Administrative Code" or "Admin. Code") § 16-505(a). It is this licensing scheme that continues to be the primary means of ensuring that an industry historically plagued with 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. However, the licensing scheme is not limited to a mere decision as to whether an applicant has ties to organized crime, since Local Law 42 of 1996 ("Local Law 42") grants the Commission broader discretion to make a determination as to the "good character, honesty and integrity" of applicants. *See Canal Carting, Inc. v. City of New York Business Integrity Commission*, 66 A.D.3d 609, 888 N.Y.S.2d 30 (1st Dep't 2009). Thus, the licensing scheme enables the Commission to fulfill its mission by authorizing it to refuse licensure or registration to an applicant that, *inter alia*, lacks such good character, honesty and integrity. *See* Admin. Code § 16-509(a).

Admin. Code § 16-510(d) provides that "[a] licensee shall not employ or engage as an agent any person with respect to whom the commission has made a final determination, following a background investigation conducted pursuant to this section, that such person lacks good character, honesty and integrity." The Administrative Code sets forth an illustrative list of relevant factors for the Commission to consider in making a licensing or registration decision relative to the good character, honesty and integrity of a trade waste applicant. Those factors are also relevant

to Commission determinations as to prospective employees/agents under Admin. Code § 16-510, and include failure by the applicant to provide truthful information in connection with the application. *See* Admin. Code § 16-509(a)(i). Additionally, the Commission may deny a license or registration to an applicant who “has knowingly failed to provide the information and/or documentation required by the Commission.” *See* Admin. Code § 16-509(b).

III. *Statement of Facts*

On or about September 10, 2025, Wilson filed a Disclosure Form with the Commission. *See* Disclosure Form. Wilson certified that the answers he provided in the Disclosure Form were “full, complete and truthful.” *See id.* at 20. Wilson indicated that he sought to work for Action Carting as a “Customer Service Representative.” *See id.* at 1.

Question 21 of the Disclosure Form asks: “Have you ever been convicted of any criminal offense in any jurisdiction?” Wilson answered “yes.” *See id.* at 9. Wilson provided information relating to one criminal conviction in response to Question 21. Wilson stated that he was arrested on: “October 10, 2022.” *See id.* Wilson stated that the date of conviction was: “August 10, 2023.” *See id.* With regard to the indictment or index number, Wilson stated: “IDK” and “Not sure.” *See id.* Regarding the “Charges and Sentence,” Wilson stated: “Unlawful possession.” *See id.* Wilson stated that the Court and Jurisdiction for this conviction were: “Bergen County, NJ.” *See id.*

Question 29 of the Disclosure Form asks: “Do you know or have you ever knowingly been associated with, socially or professionally, any person known by you to be convicted of a felony or having ties with organized crime?” Wilson answered: “no” to this question. *See id.* at 14.

Criminal History of Maxwell Miles Wilson

On or about September 24, 2007, Wilson was arrested in New Jersey and was charged with aggravated assault - serious bodily injury, possession of a weapon with a purpose to use it unlawfully against the person or property of another, and unlawful possession of a weapon. *See* New Jersey Criminal History Detailed Record. On or about August 31, 2009, Wilson pleaded guilty to aggravated assault – serious bodily injury in violation of New Jersey Statutes Annotated (“N.J.S.A.”) §2C:12-1B (1). *See id.* Wilson was sentenced to four years in prison. *See id.* Wilson did not disclose this to the Commission.

On or about June 29, 2009, Wilson was arrested in New Jersey and was charged with controlled dangerous substance distribution and possession with intent to distribute. *See id.* On or about December 9, 2009, Wilson pleaded guilty to controlled dangerous substance distribution and possession with intent to distribute, in violation of N.J.S.A. §2C:35-5. *See id.* Wilson was sentenced to one year in prison. *See id.* Wilson did not disclose this to the Commission.

On or about March 19, 2015, Wilson was arrested in New Jersey and was charged with possession of a controlled dangerous substance, distributing, dispensing or possessing with intent to distribute a controlled dangerous substance or controlled substance while on school property or within 1000 feet of school property. *See id.* On or about April 11, 2016, Wilson pleaded guilty to

manufacturing and distributing a controlled dangerous substance, in violation of N.J.S.A. §2C:35-7. *See id.* Wilson was sentenced to four years in prison. *See id.* Wilson did not disclose this to the Commission.

On or about March 8, 2016, Wilson was arrested in New Jersey and was charged with unlawful possession of a controlled dangerous substance. *See id.* On or about August 19, 2016, he pleaded guilty to the charge. *See id.* Wilson was sentenced to 18 months in prison. *See id.* Wilson did not disclose this to the Commission.

On or about February 6, 2019, Wilson was arrested in New Jersey and was charged with aggravated assault – serious bodily injury. *See id.* On or about December 9, 2019, Wilson pleaded guilty to attempted aggravated assault – cause significant bodily injury. *See id.* Wilson was sentenced to two years’ probation. *See id.* Wilson did not disclose this to the Commission.

On or about February 3, 2022, Wilson was arrested in New Jersey and was charged with unlawful possession of a handgun, possession of a weapon for an unlawful purpose, aggravated assault – serious bodily injury, aggravated assault – firearm, aggravated assault – deadly weapon, endangering the welfare of a child, abuse or neglect, and certain persons with prior felony convictions to not have any firearms. *See id.* On or about June 14, 2023, Wilson pleaded guilty to unlawful possession of a weapon. *See id.* He was sentenced to three years’ prison. *See id.* Wilson did not disclose this to the Commission.

On or about October 9, 2022, Wilson was arrested in New Jersey and was charged with uttering of false government documents, hindering one’s own apprehension or prosecution, aggravated assault – serious bodily injury, endangering the welfare of a child, abuse or neglect, possession of a weapon for unlawful purposes, unlawful possession of a handgun, and certain persons with prior felony convictions not to have any firearms. *See id.* On or about April 17, 2023, Wilson pleaded guilty to hindering one’s own apprehension or prosecution and unlawful possession of a weapon. *See id.* He was sentenced to three years in prison. *See id.*

On or about June 14, 2023, Wilson was found guilty of violating probation. *See id.* As a result, Wilson’s probation was revoked and he was sentenced to three years in prison. *See id.*

Maxwell Miles Wilson is an Admitted Member of an Organized Crime Group

In a September 3, 2017, NorthJersey.com article, the Bergen County Prosecutor’s Office stated that Wilson was part of the Rollin 20’s Bloods, a subset of the national Bloods street gang. *See* Koloff, Abbott, Janoski, Steve, and Torrejon, Rodrigo “Alleged drug dealers, some with violent history, among dismissed Hackensack cases,” NorthJersey.com, September 1, 2018, updated on September 3, 2017, www.northjersey.com/story/news/2017/09/01/alleged-drug-dealers-some-violent-history-among-dismissed-hackensack-cases/624874001/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z116321v116321d--70--b--70--&gca-ft=184&gca-ds=sophi.

The Bloods has been identified by federal, state and city law enforcement as an organized crime group. *See United States v. Murray, et. al., Cr. No. 22-401 (S-1) (JMA), Eastern District of New York Superseding Indictment.* The Bloods is a violent street gang

with members and associates located throughout Long Island, New York, and elsewhere. *See id.* Members and associates of the Bloods have engaged in acts of violence, including acts involving murder, robbery and assault, as well as other criminal activity, including drug trafficking and fraud. *Id.* Participation by a member or an associate in criminal activity, especially violence directed at rival gangs or anyone who disrespected the Bloods, increased the respect accorded to that member or associate and could result in gaining entrance to the Bloods or a promotion to a leadership position. *Id.* Members and associates of the Bloods purchased, maintained and circulated a collection of firearms for use in criminal activity. *Id.*

The United States Attorney's Office for the Eastern District of New York has alleged that the Bloods, including its leadership, membership and associates, constituted an "Enterprise" as defined in Title 18, United States Code, Section 1961 (4), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. *Id.* The Bloods constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. *Id.* The Bloods was an organized criminal group that operated in the Eastern District of New York and elsewhere. *Id.*

The Bloods routinely held meetings to, among other things, plan criminal activity. *Id.* At meetings, members paid dues into a treasury. *Id.* The treasury funds were used, among other things, to purchase firearms and ammunition and to assist members who had been arrested. *Id.* Members of the Bloods sometimes signified their membership and allegiance to the gang by wearing the color red, displaying special hand signals and wearing tattoos. *Id.*

On or about December 22, 2024, Wilson was interviewed on a podcast. *See Transcript, Locked In with Ian Bick, "Gang Member Reveals the Harsh Reality of Gang Life and Why It's So Hard to Leave."* *See* www.youtube.com/watch?v=4DOzbN7hUAc. During this interview, Wilson discussed, among other things, how he was charged with a crime for hitting a person over the head with a bottle when he was 20 years old and was convicted when he was 23 years old. *See id.* Wilson also discussed his membership in the Bloods organized crime group. *See id.* Wilson continued to discuss several of his other arrests and convictions on drug charges, a shooting, aggravated assault, and furnishing fake identification to a police officer. *See id.*

IV. Basis for Determination

A. Wilson provided false and misleading information to the Commission on his Disclosure Form.

Administrative Code § 16-509(a)(i) permits the Commission to deny a registration or license application of a business applicant which has failed to provide truthful information in connection with the application. Such basis is equally applicable with respect to the consideration of an Employee/Agent Disclosure Form. Failure to provide truthful information to the Commission is a basis to find that the employee lacks good character, honesty and integrity.

Wilson provided the Commission with false and misleading information on the Employee/Agent Disclosure form that he filed because he did not disclose his entire criminal history. Furthermore, Wilson provided the Commission with false and misleading information by failing to disclose that he had been associated with people known by him to be convicted of felonies or having ties with organized crime. In fact, as an admitted member of the Bloods organization, Wilson himself is a member of an organized crime group. Wilson failed to disclose his complete criminal history and failed to disclose his membership in the Bloods organization despite his certification that the answers that he provided in the Disclosure Form were "full, complete and truthful." For this independently sufficient reason, we find that Wilson lacks the requisite good character, honesty and integrity to be employed in the trade waste industry.

B. Wilson has a lengthy criminal history and is a member of an organized crime group.

Administrative Code § 16-509(a)(iii) authorizes the Commission to deny a registration or license application of a business applicant based on a 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 or registration. In addition, Administrative Code § 16-509(a)(vi) authorizes the Commission to deny a registration or license application of a business applicant based on an 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. Both of these grounds are similarly applicable with respect to the consideration of an Employee/Agent Disclosure Form.

In making a determination as to an applicant's good character, honesty and integrity, Administrative Code § 16-509(a)(iii) expressly permits the Commission to consider the conviction of an applicant for a crime which, considering the factors set forth in Correction Law § 753, would provide a basis for the refusal of such license or registration.¹ The factors to be considered are as follows:

- (a) The public policy of this state, as expressed in this act, to encourage the licensure and employment of persons previously convicted of one or more criminal offenses.
- (b) The specific duties and responsibilities necessarily related to the license or employment sought.
- (c) The bearing, if any, the criminal offense or offenses for which the person was previously convicted will have on his fitness or ability to perform one or more such duties or responsibilities.

¹ The Administrative Code defines an "Applicant" as "the entity [that applies to the Commission] and each principal thereof." See Admin Code § 16-501(a).

- (d) The time which has elapsed since the occurrence of the criminal offense or offenses.
- (e) The age of the person at the time of occurrence of the criminal offense or offenses.
- (f) The seriousness of the offense or offenses.
- (g) Any information produced by the person, or produced on his behalf, in regard to his rehabilitation and good conduct.
- (h) The legitimate interest of the public agency or private employer in protecting property, and the safety and welfare of specific individuals or the general public.

See Correction Law § 753.

Upon consideration of the factors in Correction Law § 753, the balance falls in favor of finding that Wilson lacks good character, honesty and integrity. Despite the public policy of New York State to encourage the licensure of persons previously convicted of one or more criminal offenses, a finding that Wilson lacks good character, honesty and integrity is warranted based on his lengthy and repeated criminal record. The trade waste industry has historically been subject to the pervasive influence of organized crime to the detriment of the City of New York. Wilson's convictions- some of which were for violent crimes, and others that involve crimes of moral turpitude- directly relate to the trade waste industry because consideration of the Employee/Agent Disclosure Form must be based on an evaluation of, inter alia, Wilson's ties to members and associates of an organized crime group. In this regard, Wilson's demonstrated willingness to commit numerous crimes establishes his lack of fitness to be employed in a sensitive position within the trade waste industry where organized crime influence could readily be exerted.

If Wilson were to be permitted to be employed in the trade waste industry in New York City, he would be engaged in an activity in which he would have direct contact with trade waste customers and potential trade waste customers. In these specific duties, Wilson would have the direct ability to coerce such customers into accepting unfair and anti-competitive service terms, as was historically common in the private carting industry that was controlled by organized crime. Thus, the specific duties and responsibilities that would be performed by Wilson weigh against the approval of his Employee/Agent Disclosure Form. Similarly, Wilson's convictions bear heavily on his fitness and ability to properly perform such responsibilities with honesty and integrity.

Further, less than four years have passed since Wilson's last arrest and this time period cannot be viewed as remote, particularly because this small passage of time has clearly not resulted in Wilson's acceptance of full responsibility for committing these crimes. Wilson could have demonstrated such responsibility by honestly disclosing to the Commission his complete criminal history when he had the opportunity to do so in 2025.

Additionally, Wilson was between the ages of 22 and 37 when he committed these crimes. Accordingly, it cannot be maintained that such charges were attributable to youthful indiscretions. From September 2007 to October 2022, Wilson was arrested and convicted of crimes on several different occasions and spent multiple stints in prison as a result.

After balancing the factors set forth in Correction Law § 753, we conclude that Wilson's vast and recent criminal record coupled with his admitted membership in an organized crime group is an independently sufficient ground to find that he lacks good character, honesty and integrity to be employed in the trade waste industry.

V. Conclusion

The Commission is vested with broad discretion to determine whether employees or agents of licensees lack good character, honesty and integrity. Based on the background investigation into Wilson and the facts relating to this matter, we conclude based on the abovementioned independently sufficient reasons that Wilson lacks the good character, honesty and integrity necessary to participate as an employee in the trade waste industry in New York City. Wilson was provided with notice of the Commission staff's findings and was provided with opportunities to respond. Wilson failed to respond, leaving these findings uncontested. This Final Determination is effective immediately.

Dated: New York, New York
May 19, 2026

CITY OF NEW YORK
BUSINESS INTEGRITY COMMISSION



Asim Rehman
Commissioner and Chair



Department of Sanitation



Department of Investigation



Department of Consumer and Worker Protection



Department of Small Business Services



New York City Police Department