



NEW YORK CITY  
DEPARTMENT OF  
INVESTIGATION

Report  
*to the*  
Mayor  
1990-1993

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## Letter to the Mayor



*Mayor David N. Dinkins and Commissioner Susan E. Shepard, December 1993.*

Dear Mayor Dinkins:

I have been honored to serve as the Commissioner of the Department of Investigation since January 1990. I take great pride in DOI's impressive investigative accomplishments over the past four years. In addition, I can confidently say that, despite extremely severe budget reductions, DOI is more professionally and effectively managed today, at all levels, than when I took office.

Despite a 35 percent funding cut and a 44 percent reduction in headcount since January 1990, DOI referred more cases — and more high quality cases — to prosecutors in fiscal 1993 than in fiscal 1990. At the same time, we conducted 27,000 more Vendex checks than in fiscal 1990 while continuing to meet our important responsibilities for background investigations, fingerprinting of child care workers and oversight of City Marshals.

We achieved these results by reorganizing and professionalizing the agency to fully draw on its wealth of investigative talent and vast expertise about the operations of City agencies.

We reduced the number of Inspectors General from 25 to 13. That allowed us to substantially upgrade the quality of the Inspectors General and to make relatively greater reductions in non-investigative personnel. At the same time, Inspector General offices were grouped according to the nature of their investigative work — inspections, capital construction, public assistance and grants, procurement and correctional services — to develop special expertise and share investigative resources.

We have designed and implemented a computerized case tracking system that enables supervisory personnel to effectively monitor the progress of investigations.

Drawing on some of the agency's most talented analysts, we created an internal control unit. It has been reviewing the operation of each agency unit, and we have, in each case, implemented its recommendations for procedural changes.

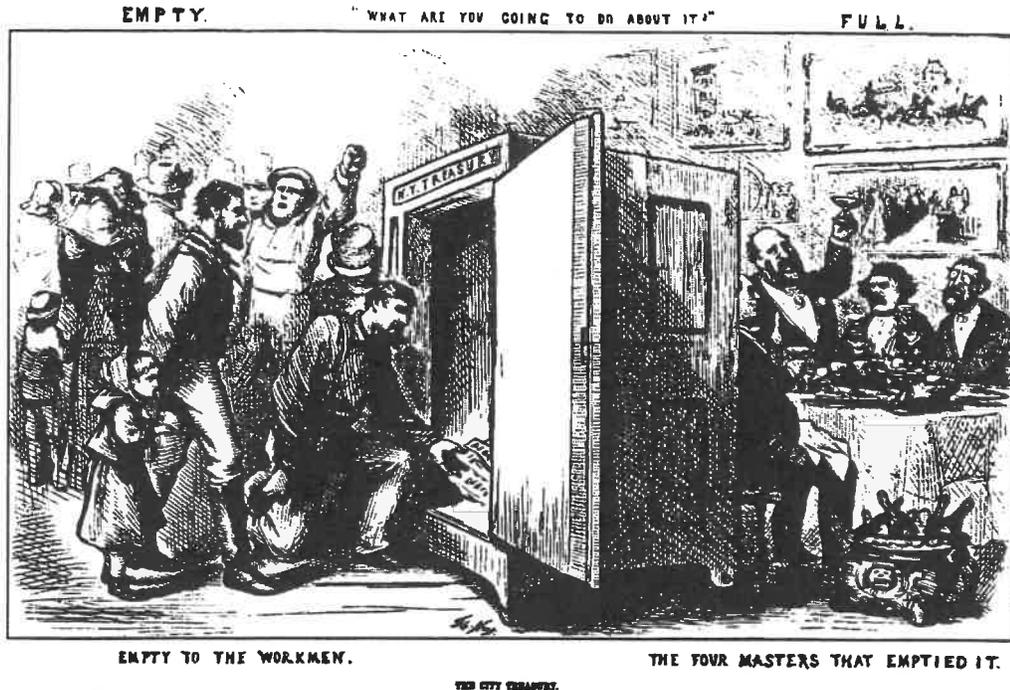
This report highlights some of our investigative achievements in the last four years. Without your commitment to full independence for DOI, we could not have conducted objective, aggressive and thorough investigations. For that, I, the staff of DOI and the citizens of New York City thank you.

Respectfully,

Susan E. Shepard

December 1993

# INTRODUCTION



Cartoon by Thomas Nast, circa 1870, on Tammany corruption.

The history of the New York City Department of Investigation ("DOI") extends back to 1873, when New York City government was dominated by the immensely corrupt Tammany Hall political machine. In response to disclosures of the wholesale looting of public funds by City officials and business interests linked to Tammany, DOI, then named the Commissioners of Accounts, was formed to review and report on the City's receipt and expenditure of funds. Today, DOI continues to lead City government's fight against public corruption, fraud, theft and other crimes committed by City employees and those who do business with the City.

In the 120 years since DOI's founding, the executive branch of City government has evolved into an intricate network of mayoral offices and departments, boards, commissions, and public corporations and authorities that perform an extraordinary range of functions needed to keep the City vital and vigorous. The City has the nation's largest municipal police force, sanitation department, fire department and correctional system. It maintains thousands of miles of roads, hundreds of bridges, a water supply system that is an engineering marvel, and myriad other components of a vast public infrastructure. Its social services system addresses the needs of the largest and most diverse urban population in the nation.

By any measure, City government is enormous. According to 1990 census data, it is the nation's third largest unit of state or local government, ranking only behind the states of California and New York. Its expense budget for Fiscal Year 1994 is more than \$31 billion. Its \$40 billion ten-year public works program is larger than that of any State except California. Its public work force of nearly 225,000 is exceeded only by three states.

Through DOI, City government, for far longer and to a greater extent than any other American city, has assumed direct responsibility for safeguarding public funds against fraud and theft and for preserving the integrity of municipal operations. So that the public may better understand and assess DOI's work, this report is being issued to provide information about DOI's powers and functions, its budget, staffing, and organization, and its investigations during the administration of Mayor David N. Dinkins.

## DOI'S FUNCTION AND POWERS

**D**OI is the City agency primarily responsible for investigating public corruption, fraud and other crimes against the City. In addition to performing this critical criminal law enforcement function, DOI routinely makes recommendations to help City government protect itself from criminal schemes designed to take advantage of flaws in the way the City conducts business.

The New York City Charter ("the Charter") empowers DOI to conduct investigations upon its own initiative and at the direction of the Mayor, the City Council, and, with respect to ethics provisions of the Charter, the Conflicts of Interest Board. DOI's authority to act on its own is very broad. The Charter states:

The commissioner is authorized and empowered to make any study or investigation which in his [or her] opinion may be in the best interests of the city, including but not limited to investigations of the affairs, functions, accounts, methods, personnel or efficiency of any agency.

The Charter's grant of jurisdiction to DOI is equally comprehensive:

The jurisdiction of the commissioner shall extend to any agency, officer, or employee of the city, or any person or entity doing business with the city, or any person or entity who is paid or receives money from or through the city or any agency of the city.

The Charter also gives DOI the powers it needs to gather evidence effectively. The DOI Commissioner is the only mayoral official with the power to issue subpoenas. Every officer and employee of the City is required to cooperate fully in DOI investigations. Any officer or employee who acts to hinder a DOI investigation is subject to dismissal.

DOI's powers under the Charter have been reinforced by several mayoral executive orders. DOI is authorized to compel the testimony of City officers and employees by the grant of use immunity. City officers and employees are required to notify DOI of all complaints ranging from corruption to gross mismanagement. No City officer or employee may conduct an investigation of corruption, criminality or conflicts of interest without DOI's authorization.

To encourage the flow of complaints to DOI, local law prohibits the City from taking adverse personnel actions against its employees who report information of corruption, criminality and conflicts of interest to DOI and, in addition, to the City Council and the City Comptroller, who are required to forward any such information they receive to DOI.<sup>1</sup>

DOI's investigations, because they often bring to light serious problems in the operations of City agencies, have the potential to bring the DOI Commissioner into conflict with the administration in which the DOI Commissioner serves. For this reason, two reforms were introduced in the Charter in 1990 to foster the independence of the DOI Commissioner. First, the DOI Commissioner is the only head of a City Department whose appointment by the Mayor is subject to the advice and consent of the City Council. Second, the Mayor, who has unfettered power to dismiss all other heads of City Departments, may remove the DOI Commissioner only "upon filing with the office of personnel director and serving upon the commissioner the reasons therefor and allowing such officer an opportunity of making a public explanation."

<sup>1</sup> DOI also actively solicits complaints from the public. See Appendix A.

An earlier reform designed to promote independence, and thereby aggressive and thorough investigations, was taken in 1987 when DOI took over the management of the City's Inspector General ("IG") system, which was established in 1972. Until the IG offices were merged into DOI, IGs were appointed by, accountable to, and derived their budgets from the head of the agency they were responsible for investigating. Corruption scandals in the mid-1980s involving the Parking Violations Bureau and the Taxi and Limousine Commission indicated that IGs would be better able to conduct investigations if they were employees of and accountable to the DOI Commissioner rather than the heads of City agencies.

In addition to its central obligation to conduct investigations of public corruption, fraud and other serious crimes against the City, DOI has seven other significant responsibilities:

- Pursuant to authority delegated by the State judiciary, DOI's Marshals Bureau regulates and collects fees owed the City by City marshals.
- DOI is charged with investigating complaints (commonly referred to as "whistleblower" complaints) by City employees who allege that they have suffered adverse personnel actions in retaliation for reporting information about corruption, criminality, conflicts of interest, gross mismanagement or abuse of authority to DOI, the City Council or the City Comptroller.
- DOI annually collects, compiles and reports to the Mayor and City Council information from City agencies about significant corruption hazards affecting their operations.
- As part of the City's VENDEX process, DOI reports adverse information from its files about prospective City contractors to contracting agencies and the Mayor's Office of Contracts.
- DOI collects and verifies significant information about persons hired and promoted to managerial and certain other important positions in City government.
- DOI annually collects financial disclosure forms from City managers and City employees earning more than the minimum salary of City managers.
- DOI fingerprints and conducts criminal history checks for persons being employed as child-care workers.

## DOI'S BUDGET, STAFFING AND ORGANIZATION



*Mayor David N. Dinkins, Commissioner Susan E. Shepard and recipients of 1991 DOI achievement awards.*

**D**OI's budget has declined from \$25 million at the start of Fiscal Year 1991 to \$18.8 million at the start of Fiscal Year 1994. During the same time period, DOI's staffing has declined from 567 to 345. Reductions of this magnitude could have profoundly impaired DOI's ability to do its work effectively. The substantial loss of employees diminished DOI's reservoir of investigative expertise and knowledge about government operations and complicated the management of investigations due to the need to reassign cases and responsibly reduce case inventories. Moreover, the budgetary reductions left DOI with insufficient resources to sustain an IG system based on 25 separate IG offices, each with its own supervisory, investigative and support staff, materials and equipment.

To address these problems, DOI took the following actions to reorganize its investigative and IG offices, improve its case management and records systems, and maintain the professionalism of its investigative staff.

- All investigative units were placed within a single Investigations Division. Previously, major cases developed by IGs were reassigned to investigative personnel within an investigations unit that existed within DOI prior to the merger of the IG system into DOI. The reassignment of cases impaired the incentive of IG personnel to develop major cases, was inefficient, disruptive and damaging to the morale of IG supervisors and investigators. Now cases stay with the IG offices that developed them, and auditors, attorneys and a squad of police officers and special investigators are assigned to assist. This change set the foundation for a complete merger of DOI and the IG offices and facilitated the efficient use of scarce investigative resources.

- The number of IG offices was reduced from 25 to 13, and the offices were grouped into 5 units. Each unit focuses on major governmental functions, for example, construction, public assistance and grants, procurement, inspections, and correctional services. The consolidation streamlines supervision, reduces administrative overhead, and promotes the development of

specialized investigative expertise and the efficient sharing and use of information. To remain effective, it is essential that DOI gets the maximum advantage out of every case, informant, field associate and cooperator. And, in Fiscal Year 1993, DOI relocated eight IG offices into one central location, thus permitting greater sharing of investigative personnel and resources.

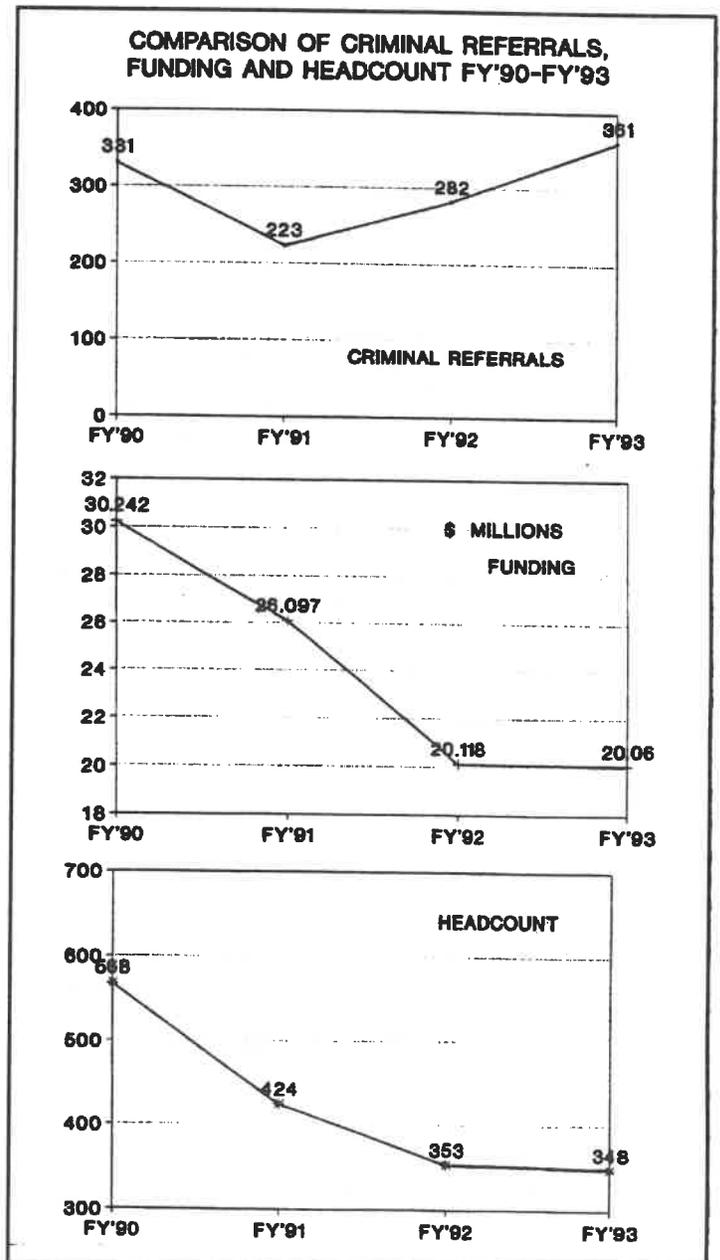
- Two computerized case management systems were developed — entirely by DOI personnel — to address the inadequacies of antiquated case management and records systems that precluded effective case review by supervisors and inter-office sharing of DOI's data base. Complaint and case files were centralized and standardized, thereby greatly facilitating case management and the retrieval of information in intelligence and investigative files.

- Through the use of the new computer system, an accurate inventory of open investigations was prepared and reviewed by executive and investigative staff. This action was critically necessary because the sharp reduction in staffing levels left DOI with more open cases than it could responsibly address, causing delays in completing investigations, and the diversion of resources away from case development and more complex inquiries. Now supervisors can more effectively monitor the progress of investigations and allocate resources where most needed.

- For the first time, an investigative manual was prepared for the management of IG offices and the supervision and conduct of investigations. The manual recognizes that investigative work is a professional discipline, requiring specialized skills and knowledge, that is carried out against a backdrop of strict legal principles and mandates.

- A Training Committee was formed to acquire and disseminate information regarding available investigative training opportunities for investigative staff. With an emphasis on an in-house training program, the Training Committee devised and implemented the DOI Basic Investigation Course and a series of seminars directed at both investigators and investigative managers, and is developing practical courses in various advanced investigative techniques. In-house training is also supplemented by utilizing experts from other federal and law enforcement agencies and with courses offered by those agencies.

- In accordance with the Charter mandate that heads of mayoral agencies maintain an internal control environment to maximize the effectiveness and integrity of operations, an internal control unit was established which is systematically reviewing, and thereby improving, important departmental functions.





Cartoon by Sean Delonas, *New York Post* (1992), following DOI's arrest of Taxi and Limousine Commission inspectors. Reprinted with permission.

Since January 1990, DOI has completed investigations resulting in more than 1100 referrals to prosecutors, 450 arrests, and 850 referrals to agencies for disciplinary and other administrative actions. In those cases and many others, DOI has advocated program changes that would effectively deliver City services with less risk of fraud and corruption.

Summarized below are selected investigations that reflect the broad scope of DOI's work from 1990 through 1993. These summaries are followed by two expanded lists of representational cases, the first identifying investigations resulting in arrests, or prosecutorial referrals, and the second describing recommendations to address management flaws uncovered in the investigations which increased the risks of corruption, fraud and other crimes.

## I. PUBLIC ASSISTANCE AND GRANTS

The City disburses more than \$6 billion per year to welfare recipients and not-for-profit organizations that provide social services to the public. DOI's Public Assistance and Grants Unit monitors the Human Resources Administration, the Department of Social Services, the Department of Employment, the Department of Mental Health, Mental Retardation and Alcoholism Services and other social services agencies to guard against losses of public funds intended for the poor, infirm and disadvantaged. Types of corrupt and criminal conduct consistently identified by social services agencies include bribery, extortion, forgery, data tampering, theft, embezzlement, bid-rigging and overbilling.

### Fraudulent Welfare Cases ("Euclid")

In 1991, DOI's Inspector General assigned to the Human Resources Administration identified approximately 1000 fictitious public assistance cases costing the City more than ten million

dollars per year. All the cases were opened by female applicants purporting to have two or three pre-school children, who presented fraudulent birth certificates and social security numbers reserved for future use by the Social Security Administration. To date, 116 persons have been charged with receiving between \$20,000 and \$313,000 in benefits under as many as 12 different names. The total loss from these schemes was at least \$45 million.

Based on DOI recommendations, HRA has purged all the fictitious names identified by DOI from the welfare rolls and now verifies social security numbers provided by welfare recipients. Two other DOI recommendations are still under HRA review. HRA is not yet routinely verifying birth certificate and address data, but has begun to corroborate the more than 80,000 existing client records with discrepancies in at least one of five major identifying categories.

#### Embezzlement at Home Attendant Program ("EHCCI")

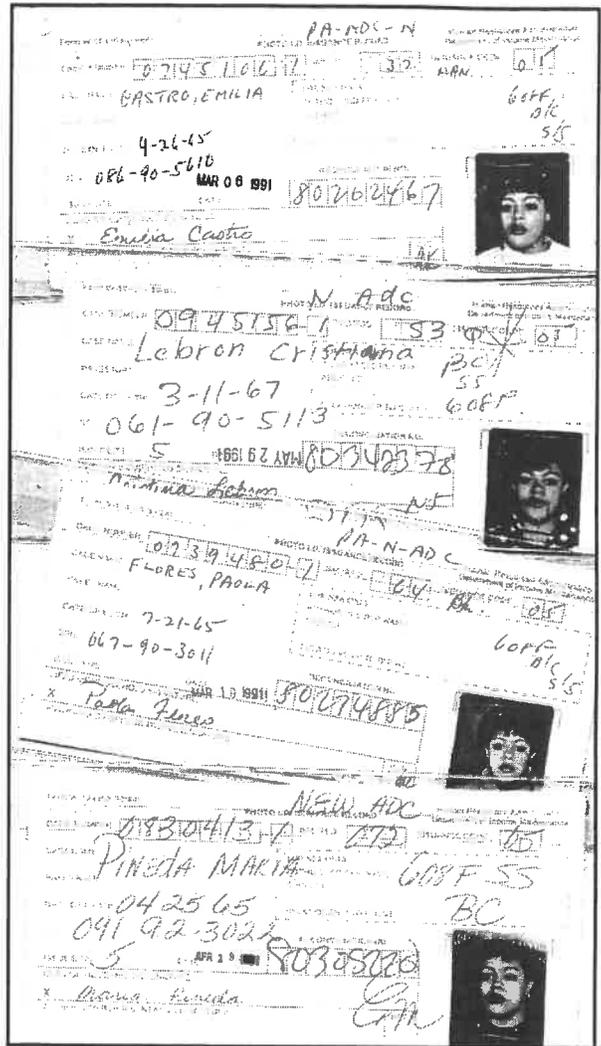
In October 1990, DOI arrested the former assistant director of a City-funded home attendant program and two accomplices for stealing more than \$1.1 million in program funds over a five-year period. The scheme, which was made possible because the assistant director both accounted for the receipt and expenditure of HRA funds and was empowered to write checks against the program's accounts, went undetected for years despite annual audits conducted by accounting firms under contract with the City. The investigation revealed major deficiencies in the audits of the program, including the failure to reconcile internal accounting records to bank records.

The insurance company which insured HRA against fraud has paid HRA \$1 million. DOI has worked in conjunction with the Corporation Counsel in a civil forfeiture action to recoup the remaining losses and to recover the fees charged by the outside auditing firms who failed to detect the fraud.

#### Embezzlement From City-Funded Organization ("KMD")

In July 1992, DOI arrested Christina Choi, an assistant commissioner with the Department of Employment ("DOE"), and Miok Lee, the Chairwoman of Korean Manpower Development Inc., a non-profit organization funded by DOE, for embezzling \$250,000 in public funds over a three-year period. Ms. Choi was the director of Korean Manpower before serving as the DOE assistant commissioner responsible for the oversight of DOE funded organizations, including Korean Manpower.

The arrests ended a fraudulent scheme that cost the City at least \$80,000 per year. The defendants' assets, totaling more than a half million dollars, were seized after the arrests. In



Public assistance IDs issued to a single person using four fictitious identities.

November 1993, Ms. Choi pleaded guilty in federal court, Eastern District, to obstructing justice and filing a false tax return in connection with the scheme. Ms. Lee is currently awaiting trial.

## II. CONSTRUCTION AND PUBLIC WORKS

At the start of fiscal year 1993, the City planned on spending \$47 billion over the next ten years for the construction and repair of public housing, hospitals, schools, streets, bridges, subway track, courthouses, jails, water mains, sewers, pollution control plants, landfills, and myriad other public buildings and facilities. The enormity and complexity of the City's public works program offers innumerable opportunities for corruption, fraud and theft from the initial design through the completion of construction. DOI's ability to conduct successful investigations of crimes occurring in the award, management and performance of public construction contracts depends on developing broad expertise about the methods and operations of public agencies and the construction industry. Toward that end, DOI placed under common supervision IG Offices that oversee major construction agencies and formed a construction task force consisting of IGs and other investigative managers and supervisors involved in construction related investigations.

### Fraudulent Surety Bonds ("Double Indemnity")

DOI has conducted investigations, resulting in the arrest and conviction of six persons, involving the submission of fraudulent performance and payment bonds by construction and maintenance contractors doing business with City agencies. These bonds are required by State law and protect the City against losses caused by contractors who are unable to complete work. Fraudulent bonds have been found in more than 70 contracts let over a five-year period, with aggregate contract values of \$85 million and aggregate premium values of approximately \$1.5 million. To date, the City has recovered \$963,352 from contractors and stopped payments of \$1.1 million to contractors who did not have legitimate bonds.

In response to DOI's recommendation, the Department of General Services confirms the authenticity of bonds directly with the surety company rather than the broker, and consults the directory published by the State Insurance Department to ensure that the bonds are issued by companies licensed to do business in New York. DOI has also requested that the Mayor's Office of Risk Management issue a memo to all City agencies regarding the few straightforward steps that should be taken to verify the authenticity of bonds.

#### FORM OF BID BOND

KNOW ALL MEN BY THESE PRESENTS, that we, \_\_\_\_\_

BLOUNDER & BLONDER DBA B & B CONSTRUCTION

hereinafter referred to as the "Principal", and \_\_\_\_\_

AMERICAN MANUFACTURERS MUTUAL INSURANCE COMPANY

hereinafter referred to as the "Surety", are held and firmly bound to THE NEW YORK CITY HOUSING AUTHORITY, hereinafter referred to as the "Housing Authority", or to its successors and assigns in the

penal sum of Two hundred and Eighty Thousand----- DOLLARS

(\$ 280,000.00 ) lawful money of the United States, for the payment of which said sum of money well and truly to be made, we, and each of us bid ourselves, and heirs, executors, administrators, successors and assigns, jointly and severally, firmly by these presents.

Whereas, the Principal is about to submit (or has submitted) to the Housing Authority the accompanying proposal, hereby made a part hereof, to enter into a contract in writing for General Construction for Contract Number 91000498 Situate 510  
Cheney St. & 485 Kew-Forest St. & 801 Marcy Ave. all Brooklyn N.Y.

NOW, THEREFORE, the conditions of this obligation are such that if the Principal fails to perform its obligations under the contract, the Surety shall be bound to pay the penal sum of the bond to the Housing Authority.

*Fraudulent surety bond submitted using the name of a non-existent insurance company.*

In addition, members of DOI's Procurement, Real Property, Parks and Finance Unit have conducted seminars with agency ACCOs and General Counsels to advise them of the risk of fraudulent surety insurance bonds and preventive methods.

#### **HPD Maintenance Contracts ("In-Rem")**

In April 1991, and January 1992, DOI arrested 14 persons, including eight employees of the Department of Housing Preservation and Development ("HPD") and six private contractors on bribery charges in connection with the award of contracts for maintenance and repair work at City-owned buildings. HPD, which manages more than 4000 residential buildings owned by the City as a result of tax foreclosures, awards contracts for jobs like replacing doors or window panes, painting hallways and deleading walls and ceilings. The HPD employees arrested, who were responsible for awarding contracts under \$10,000, received bribes in exchange for awarding nearly \$200,000 worth of contracts.

#### **14th Street Reconstruction Project ("14th Street")**

In November 1993, a report, prepared by DOI's Corruption Prevention and Management Review Bureau, revealed that an engineering firm hired by the Department of Transportation to supervise the \$23 million reconstruction of 14th Street, from Avenue C to the Hudson, in Manhattan, performed incompetently and that DOT failed to adequately monitor and supervise the engineering firm's work.

It was revealed that nearly 25 percent of 800 loads of concrete poured to reconstruct the roadbed between July 3 and September 13, 1991, was substandard. While tests conducted by the engineering firm, which was paid \$1.6 million to serve as DOT's representative at the site,



*Construction on 14th Street. Reprinted with permission of Newsday/Richard Lee.*

revealed that the concrete was substandard, the firm did not stop the continued pouring, or demand that it be removed, or report its use to DOT. In addition, the resident engineer assigned to the project falsely certified that all materials supplied and work performed were fully in compliance with the provisions.

DOT managers were criticized for assigning a relatively inexperienced staff engineer to manage this, and eight other, projects. DOT also failed to hold the engineering firm accountable for its failures before assigning its own staff to supervise the project.

The report also found that numerous safety hazards were created by the reconstruction in 1990 and 1991, including unbarricaded materials, blocked access to fire hydrants, non-working street lights and signals, unremoved debris, and unfilled potholes and excavations.

The report contains eleven recommendations to DOT to correct the management weaknesses identified.

#### **Forged Asbestos Licenses ("Hot Cards")**

In September 1991, DOI arrested five persons at four "employment agencies" in the Greenpoint neighborhood of Brooklyn for selling bogus asbestos removal licenses to undercover investigators. DOI investigators, posing as Polish immigrants, purchased "three-packs" of licenses from some of the suspects for \$380 per pack. A three-pack included a forged City DEP asbestos removal license, a forged New York State Department of Labor asbestos removal license and a forged Asbestos Health Emergency Removal Act card, which serves as a federal asbestos removal license.

State law requires that construction workers who remove asbestos receive a license upon completing training from a certified program. The training and licensing requirement promotes the competent removal of asbestos for the protection of the public and the workers themselves. The bogus licenses enabled the workers, who were untrained, to remove asbestos at numerous commercial and residential sites throughout the City. Most of the licenses were sold to Polish immigrants, many of whom were in this country illegally.

#### **Water Metering Program ("Vanguard")**

In November 1991, Vanguard Meter Services and four company executives were indicted on charges stemming from their scheme to defraud the City's \$290-million water meter installation program. The investigation, which was conducted with the New York County District Attorney's Office and the federal Office of Labor Racketeering, revealed that Vanguard paid installers on a piece work basis rather than prevailing wage rates as required by City contract provisions. Vanguard also falsely represented that it performed pre-plumbing work under the supervision of licensed plumbers.

The investigation stopped a continuing fraud of approximately \$1 million per year. In addition, at the time of Vanguard's indictment, Vanguard was still owed \$6 million by the Department of Environmental Protection. The money has been retained by the City until all potential claims have been settled and the City determines the total damages of the fraud which could be as great as the total value of the contracts obtained by fraudulently representing that prevailing wage requirements and other material elements of the contract would be satisfied.

DOI recommended changes in the manner in which contracts under DEP's Universal Metering Program are monitored to insure contractor compliance. As a result, DEP has instituted new contract controls and review procedures. DEP now requires all meter installation contractors to provide certified payrolls verifying compliance with the prevailing wage law.

### III. PURCHASE OF GOODS AND SERVICES

The City spends approximately \$2 billion per year for supplies, materials, equipment, rent, utilities, contractual and consultant services, and other purchases of goods and services. Although the Department of General Services ("DGS") is the City's primary procurement agency, every City agency is involved in purchasing. Corruption, fraud or theft can occur in any City agency at any stage of the procurement process, from the initial preparation of specifications to the entry of goods into City inventory. DOI's Procurement Unit, which encompasses the IG Office for DGS, is the Department's central repository of expertise on the City's procurement policies, rules and procedures.

#### **HRA Contracts for Car Services ("Big Apple")**

In 1990, DOI made 40 arrests in an investigation of wholesale billing fraud by Big Apple car service, which, under a contract with HRA since 1984, transported abused and neglected children to HRA facilities throughout the City. The fraud involved the submission of invoices for trips never taken and was encouraged by HRA's failure to audit the contract and to follow standard procedures for verifying billings.

The cost of the Big Apple contract, the larger of two HRA contracts for car services, escalated steadily during the period 1985-1988, reaching a high of \$6 million in FY '88. As a result of DOI's investigation, fraud control measures have been implemented and car service costs have been substantially reduced. The total cost of these car services has decreased from approximately \$9 million in 1988 to \$4.5 million today. In addition, the court has ordered restitution against 15 defendants in the amount of \$130,000 and an additional \$40,000 in judgments against five defendants is outstanding.

#### **PVB Privatization Contract ("Lockheed")**

In August 1993, DOI issued a 210-page report concerning the process leading to the recommended award of a \$150 million contract for PVB privatization to Lockheed I.M.S. The report, concluding a 5-month investigation requested by the Mayor, made 12 major findings with respect to issues involving the procurement process, Lockheed's business responsibility, and the conduct of City employees.

DOI found that City officials failed to consider the City's best interests before making the determination to contract out PVB's function; that the City budget director violated City Procurement Policy Board rules by showing favoritism toward Lockheed; that Lockheed was afforded greater access than other vendors to high-level City officials who were in a position to influence the scope and award of the contract; and that the Request For Proposal limited the scope of competition because only a few vendors possessed the experience and capability to perform all the functions. The report also criticized Lockheed for failing to disclose that current company executives were connected to prior corruption scandals; omitting information on City Vendex questionnaires; and violating its own ethical standards in its lobbying of City officials.

Following the release of the report, the Mayor canceled the contract with Lockheed, which he had previously suspended pending DOI's investigation.

#### **Department of Correction Contracts ("Jenkins")**

In October 1992, William Jenkins, an assistant commissioner with the Department of Correction ("DOC") was arrested on charges that he took \$24,000 in kickbacks from a Long Island cleaning supply company in exchange for awarding it 24 contracts worth \$238,000. The DOC official, who



*DOC Assistant Commissioner William Jenkins (left) loading a box of janitorial supplies into his car; part of his price for steering contracts.*

also received quantities of janitorial supplies, only accepted bids from the company or one of several "fronts" established to make it appear that there was competition for the contracts.

Jenkins, who was terminated from his position with DOC, was charged with extortion under the federal Hobbs Act, and sentenced to one year in prison.

In addition, in August 1993, a correction officer assigned to Jenkins' unit, was charged with accepting payments from another janitorial supply company in Queens to certify that it delivered supplies to DOC when in fact it had not.

#### **Procurement for Electronic Monitoring Services ("BI")**

In May 1992, DOI issued a report criticizing two Department of Correction officials for their roles in DOC's efforts to procure electronic monitoring services, which allow DOC to monitor defendants participating in a "house arrest" program as an alternative to incarceration. The report revealed that violations of City purchasing regulations were so severe that DOC's chief contracting officer may have been improperly influenced to manage the negotiations in a way that benefitted a Colorado vendor in its selection as the low bidder on the \$1.9 million contract. The contracting officer's errors undermined the competitiveness and fairness of the procurement process. The report also criticized a DOC assistant commissioner for attending staff meetings involving the award of the contract even though the Colorado vendor was represented by her former employer.

The report recommended clarification of certain provisions of the Procurement Policy Board rules, particularly rules governing amendments and best and final offers once the evaluation process has begun. The contract was rebid and, in August 1992, awarded to another company at a cost significantly lower than the initial contract.

#### **Mismanagement at Gracie Mansion ("Headboard")**

In February 1991, DOI's Corruption Prevention and Management Review Bureau completed a review, requested by the Mayor, of expenditures at Gracie Mansion. The review followed news reports concerning the construction of a headboard for the Mayor's bedroom by City workers. DOI found that \$8.3 million in purchases involving four City agencies and costs for labor by a cadre of workers from seven City agencies had been spent at the mansion in the eight years prior to the review. One of the workers was a carpenter employed by the Human Resources Administration who expended approximately \$11,000 in labor and materials to make a headboard. The report concluded that work was routinely ordered by Mayoral aides, often (as in the case of the headboard) without the Mayor's knowledge, and performed without proper oversight or control. As a result of the review, purchases and work assignments are more closely controlled and reviewed to help ensure that City workers are not being diverted from more essential tasks, such as construction of homeless shelters and maintenance of parks.

### DEP Phony Purchase Orders ("Invisible Ink")

Following allegations of procurement fraud at the Department of Environmental Protection, DOI set up an undercover office supply company, with the assistance of the FBI, which resulted in the July 1993 arrests of two DEP employees on federal conspiracy and embezzlement charges. The employees, whose combined City employment totaled 25 years, encouraged the undercover company to submit 12 invoices to DEP for office supplies. Only four orders were actually delivered. In return for approving the remaining eight purchase orders, totaling \$15,000, the employees demanded kickbacks in the form of cash (\$8,000) a television, VCR and wall unit.



*Department of Buildings plumbing inspectors, under arrest and in the paddy wagon. Reprinted with permission of The New York Times.*

## IV. INSPECTIONS AND CODE ENFORCEMENT

The City employs approximately 3700 inspectors, 800 supervisors, 175 managers and 1000 support personnel in agencies that conduct inspections and issue permits and licenses in connection with the enforcement of City codes and regulations. These agencies include the Departments of Buildings, Fire, Health, Consumer Affairs, Sanitation, Environmental Protection, Transportation, Housing Preservation and Development, Taxi and Limousine Commission, and Business Services.

Bribery and extortion are crimes that have long plagued City agencies that conduct inspections. DOI's success in combatting inspectional corruption has continued since 1990 with investigations of organized corruption at the Department of Buildings, the Taxi and Limousine Commission and the Department of Sanitation.

### Extortion by Buildings Inspectors ("Jerico")

Following a joint investigation by DOI and the Federal Bureau of Investigation, 30 inspectors and supervisors in DOB's Construction Unit were arrested on Federal charges of conspiring to extort in excess of \$150,000 over a three-year period from building owners, contractors and other licensed professionals to expedite inspections performed prior to the issuance of certificates of occupancy ("C of O"). The Department of Buildings administers and enforces building and zoning laws in the construction and alteration of buildings in the City. No building may be used or occupied unless a C of O has been issued.

The inspectors were charged with violating the Federal Hobbs Act which bars public officials from extorting money in exchange for performing their official duties. The investigation documented more than 80 corrupt payments ranging from a \$50 fee for renovations to a single-family house to \$20,000 for the issuance of a C of O for a commercial building. A portion of the money extorted by field inspectors was "kickedback" to DOB supervisors who controlled building inspection assignments and signed off on the issuance of C of O's.

Following the arrests, DOI's Corruption Prevention and Management Review Bureau issued a report that made twenty recommendations to DOB to correct problems in the supervision and performance of inspections, and the process of granting C of O's. DOB has taken action to address the serious corruption problem in its inspectional ranks.

### Taxi Inspections ("Thirty-Nine")

In July 1992, the chief supervising inspector, four supervisors and twenty-two City taxi inspectors — more than half the inspectional force at the Taxi and Limousine Commission's Safety and Emissions Division facility in Woodside, Queens — were arrested for receiving bribes to overlook violations in yellow cabs or to allow cabs to pass inspection sight unseen. In November 1992 and July 1993, three more individuals were arrested, bringing the total to 30; and twenty-eight individuals have pled guilty.

Medallion taxi cabs are inspected three times per year to check wheel alignments, brakes,



*The TLC inspection facility in Woodside, Queens.*

emissions, lights and other safety features. Failure to pass inspection may result in suspension of the taxi cab's medallion, currently valued at approximately \$140,000. The arrested inspectors, who were paid \$50 to \$100 per cab, devised methods of evading or disabling tests to allow taxis to pass portions of the inspection the vehicle may not have otherwise passed. They received as much as \$500 cash per week, doubling their base salary of \$24,000 per year.

Following the investigation, the Mayor appointed an advisory committee to recommend changes at the testing facility, including exploring the installation of tamper-resistant equipment and improving managerial and supervisory training.

#### **Plumbing Inspectors ("Motown")**

Upon receiving allegations of bribery by plumbing inspectors employed by the Department of Buildings, DOI began an investigation which led to an indictment, in September 1993, of 23 active and retired inspectors by New York County District Attorney Robert Morgenthau. The inspectors, including the chief plumbing inspectors for Manhattan, Queens and Brooklyn, were charged with extorting dozens of payoffs — at work sites such as Police Headquarters and the World Trade Center — ranging from \$50 - \$1000 from plumbing contractors in return for expediting inspections and speeding approvals.

Plumbing inspectors are responsible for insuring that gas lines, pipes and sprinklers are safe in renovated and newly constructed buildings. While there was no evidence inspectors overlooked safety issues or code violations, contractors paid the bribes to avoid costly delays associated with setting up appointments with inspectors and "misplaced" paper work.

The DOB implemented a new computerized management system which schedules all appointments with inspectors within three days and requires the entry of all paperwork in the computer. In addition, Mayor Dinkins proposed legislation to delegate plumbing inspection responsibilities to a private entity controlled by a board composed of a majority of City officials and to allow homeowners to have their own architects and engineers conduct plumbing inspections.

#### **Sanitation Enforcement Agents ("Meal Ticket")**

In October 1993, eight Sanitation Enforcement Agents were arrested on charges of extortion and bribe receiving. SEA's are responsible for enforcing City regulations against littering and other sidewalk obstructions by issuing notices of violations to merchants and building owners who violate the regulations. Fines range from \$50 to \$250.

The agents, including a supervising lieutenant and three sergeants, demanded cash, meals and other gifts by promising to overlook violations or threatened to issue summonses for non-existent infractions. The agents supplemented their City salaries by as much as \$10,000 per year.

The October arrests followed earlier arrests — in August — of two SEA's assigned to the same unit. One individual was arrested after evidence was developed to include weapons and narcotics sales and possession. A second SEA pled guilty to bribe receiving and sentenced up to four years.

#### **Traffic Enforcement Agents ("UPS")**

In 1990, DOI received a complaint from United Parcel Service ("UPS") that traffic enforcement agents ("TEAs") employed by the Department of Transportation ("DOT") were fraudulently writing traffic tickets that were submitted to the Parking Violations Bureau but never given to



*Surveillance photo of double-parked UPS vehicle with parking summons on windshield.*

UPS drivers or placed on UPS trucks. DOI's investigation discovered more than ten TEAs who were improperly writing tickets while "cooping" in coffee shops and other places. The investigation also determined that some UPS drivers threw away valid tickets placed on the windshields of their trucks. DOI made several recommendations, which DOT has accepted, to deter cooping and the improper writing of tickets. In particular, DOT will require supervisors to make more unannounced checks on TEAs on route, a measure which will not strain existing resources.

#### **Bureau of Water Supply Police ("BWSP")**

In 1991 and 1992, DOI completed two investigations concerning mismanagement and overtime abuse in the Department of Environmental Protection's Bureau of Water Supply Police ("BWSP"), which exists to provide security through patrol and inspection for the City's upstate reservoirs and water supply facilities. The investigations revealed: that BWSP officers, without appropriate authorization and supervision, and lacking any legitimate basis, had conducted an investigation of a Black Muslim community in Sullivan County; and had received in excess of \$350,000 in overtime pay from 1986-1990 for clerical and administrative duties, firearms training, court appearances and other work unrelated to patrolling the water supply system. In addition, supervisors were paid overtime at 150 percent of the usual hourly rate from time spent commuting to and from work.

BWSP is now in compliance with City overtime regulations, has eliminated all improper overtime for commutation, and has reduced overtime expenditures by 90 percent. In addition, DEP recruited and hired a new BWSP commander in October 1992.

#### **PVB and Other Agency Summonses ("Rockin Robin"; "T. Jones"; "Here Today"; "Ticketron")**

DOI has conducted several investigations prompted by its receipt of information concerning the illegal dismissal of summonses. In 1992, DOI arrested: two employees of the Department of Transportation's Parking Violations Bureau for accepting bribes to illegally dismiss hundreds of summonses valued at more than \$68,000 over a seven and eight-month period, respectively; an employee of the Department of Consumer Affairs on charges that he accepted bribes to dismiss summonses against merchants who operate unlicensed video games; and a Sanitation enforcement officer on charges that he removed and destroyed at least 574 summonses issued to merchants for code violations, resulting in a minimum of \$99,300 in lost revenue to the City.

Except in the case of the Sanitation enforcement officer, summonses were illegally dismissed through agency computer terminals. DOI has recommended ways to tighten systems controls to prevent the illegal dismissal of summonses at PVB and the other agencies where corruption was discovered. The recommendations include more than fifty made in a report issued in August 1990 by DOI's Corruption Prevention and Management Review Bureau concerning STARS, PVB's computer system for recording and tracking summonses.

## Improper Influence on Restaurant Inspection ("Ginger Man")

In January 1992, DOI completed an investigation concerning the reopening of a mid-town Manhattan restaurant that was closed by the Department of Health for failure to pay outstanding fines. The investigation concluded that an aide to the Mayor, invoking the name of the Mayor, requested a DOH deputy commissioner to facilitate the opening of the Ginger Man and that the deputy commissioner then ordered a DOH assistant commissioner to reopen the restaurant. The assistant commissioner succumbed to the pressure applied by his superior and improperly directed that the restaurant, in contravention of standing DOH policy and procedures, be allowed to reopen with uncorrected violations.

In its report, DOI observed that the pressure applied in this case by City officials subverted DOH's efforts to professionalize its inspectional program, which only four years before had been the subject of a DOI investigation resulting in the arrest and conviction of more than half of DOH's restaurant inspectors. DOH took disciplinary action against its deputy commissioner by suspending him from employment for two weeks. The mayoral aide had left City employment before the investigation was concluded.



Cartoon by Sean Delonas, *New York Post* (1992) following issuance of the Ginger Man Report. Reprinted with permission.

DOH took disciplinary action against its deputy commissioner by suspending him from employment for two weeks. The mayoral aide had left City employment before the investigation was concluded.

## V. CORRECTIONAL SERVICES

The Department of Correction ("DOC") operates the largest municipal jail system in the United States. In Fiscal Year 1993, DOC's expense budget was \$761 million, ranking it third among all City Departments, after the Department of Social Services and the Police Department. DOC has an average daily prison population exceeding 18,500. It employs approximately 13,500 persons, 11,300 of whom are uniformed correction officers. The ratio of the inmate population to uniformed personnel is 1.8 to 1, the highest of any major prison system. To handle a more than doubling of the prison population in the past ten years, the number of correction officers (5400 in 1983) has more than doubled and DOC's budget (\$217 million in 1983) has tripled. DOC has spent about \$1.3 billion since 1985 on a major jail expansion program.

In addition to the typical corruption risks present in any large agency with substantial operating and capital budgets, DOC faces the continuing problem of the smuggling of weapons and drugs into the jails by uniformed and civilian personnel. DOI's Correctional Services Unit conducts a wide range of investigations into the operations of DOC and the conduct of DOC personnel. The Unit's work includes cases leading to the arrests of correction officers for smuggling or attempting to smuggle contraband and the issuance of three major reports, two of which describe significant breakdowns in the supervision of uniformed personnel in connection with a inmate riot at a Rikers Island jail and the housing of new inmates, and the third (summarized at page twelve above) discussing violations of City procurement regulations in the award of the contract for an electronic monitoring system.

### Inmate Disturbance on Rikers Island ("Rikers")

In August 1990, inmates at the Otis Bantum Correctional Facility on Rikers Island rioted after a 36-hour job action by correction officers that shut off access to the island by road and severely disrupted jail services. In 1991, DOI released a 271-page report, "The Disturbance at the Otis Bantum Correctional Center, August 14, 1990: Its Causes and the Department of Correction Response", that provided a detailed account of the riot and its causes. DOI found that the Department of Correction failed to follow its own emergency plans when responding to the riot. As a result there was a breakdown in command structure and discipline, and a substantial number of correction officers used excessive force against inmates, some of whom suffered head injuries.



*Injured OBCC inmates on stretchers awaiting transfer to a hospital.*

DOI made a number of recommendations, which included the mobilization of the Emergency Response Unit reacting to all significant inmate disturbances; the recording of names and respective assignments of all correction personnel responding to an emergency; and the submission of detailed written reports by correction personnel responding to an emergency. In response, the Department of Correction issued a new emergency preparedness plan and placed new markings on protective equipment used during riots so that correction officers can be easily identified.

### Contraband in City Jails ("Smugglers Blue")

DOI's Office of the Inspector General for the Department of Correction has conducted investigations resulting in the arrests of more than 23 employees and contract workers of the Department of Correction for attempting to smuggle drugs, weapons and other contraband into City jails. Twenty employees — including ten correction officers, six civilian employees and four hospital workers — were arrested for attempting to smuggle cocaine and other contraband in exchange for cash to inmates at several detention facilities. In addition, three correction employees, including two correction officers, were arrested for attempting to smuggle loaded firearms to inmates, and a correction officer was arrested for having himself shot to cover up his role in a gun-smuggling scheme by two inmates.



*Surveillance photo of DOI undercover investigator passing bribe to a DOC civilian employee to smuggle contraband to a Rikers Island inmate.*

Based on DOI's recommendation, the Department of Correction now requires all correction officers and other employees to pass through metal detectors when entering the jails to deter attempts to smuggle weapons.

#### **Bail Fund ("Bail Out")**

Following an audit of the bail system at the Anna M. Kross Center on Rikers Island by the Inspector General assigned to the Department of Correction, a correction officer was arrested for stealing \$562,000 in bail money over a three-year period. The officer was responsible for counting bail money, depositing it in a Department of Correction account and writing checks to the Department of Finance against that account. The arrest ended a scheme that cost the City approximately \$190,000 per year.

Following the conclusion of the investigation, and at the suggestion of the Inspector General, a Task Force was formed to develop and implement a new Bail Directive which would add the appropriate internal controls to the bail system to alleviate this type of fraud in the future. In June 1991, the new Bail Directive was issued, creating a separation of responsibilities and increased staff accountability.

#### **24-Hour Housing Mandate ("24-Hour")**

In April 1992, DOI issued a report, "An Investigation into the Process of Admitting Inmates at the Manhattan Detention Center Complex: Violations of Department of Correction Directives and Federal Court Orders", which revealed that Department of Correction ("DOC") officials repeatedly violated a Federal Court order and DOC directives concerning the placement of newly admitted inmates. The Department of Correction issued a series of directives that required correction officers to record the actual times inmates are taken into custody and assigned beds after the agency was held in contempt, in November 1990, for violating a Court order that newly admitted inmates be placed in a housing area within 24 hours after DOC assumes custody.

For a two and one-half month period, January 1, 1991 through March 17, 1991, DOI's Inspector General for DOC examined admission records at the Manhattan Complex and found false entries of housing times in Correction logbooks, inaccurate housing admission times, altered entries and the failure to log inmates in DOC's computer tracking system. The report concluded that some of the abuses were the result of DOC supervisors who consciously disregarded the directives by directing that false housing times be recorded to conceal the fact that inmates were not housed within 24 hours. The report recommended that DOC pursue disciplinary action against those supervisors and correction officers involved and conduct routine audits to verify custody times.

## **VI. OTHER INVESTIGATIONS AND REPORTS**

#### **Fulton Fish Market ("Stingray")**

In April 1992, DOI released its findings after a two-year undercover investigation of the Fulton Fish Market, the center of New York's multi-million dollar wholesale seafood industry. By placing undercover agents as truckers, journeymen and retailers, DOI's investigation uncovered evidence of criminal activity including extortion, loansharking, insurance fraud and intimidation of suppliers and wholesalers. The investigation focussed predominately on the "unloading crew" at the Market. Undercover investigators found that trucks delivering seafood at the Market were required to wait to be unloaded by one of six unloading crews allocated to them. Wholesalers who attempted to circumvent the rules typically found that their seafood, a perishable commodity, was either unloaded last or stolen. Investigators also found that loaders



Cartoon by Sean Delonas, *New York Post* (1992) following issuance of Fulton Fish Market report. Reprinted with permission.

made up to \$200 extra per night by illegally charging a fee to retailers who parked their vehicles on public streets near the Market. If retailers refused to pay, their vehicles were vandalized and property stolen.

Following the release of the report, Mayor Dinkins directed the City Department of Business Services to develop measures to strengthen enforcement, increase revenues and improve the business environment. Up to 20 additional Market managers and inspectors have been hired to accomplish these proposals.

### Sale of Illegal Firearms

During the Fulton Fish Market investigation, a DOI uncover investigator was approached by a worker at the Market, advising him that if he was interested in purchasing a gun, he should see an individual named "Sally". Over the course of the next seven months, DOI purchased 37 firearms, ranging from an Uzi .9mm semiautomatic handgun, an Intratec semi-automatic machine pistol and a 12 gauge "streetsweeper" shotgun. Salvatore Fianchino was arrested in



Display of firearms at City Hall press conference announcing the arrest of an illegal gun supplier.

April 1991 on multiple charges involving the illegal sale and distribution of firearms, and money laundering in connection with the belief that the weapons sold were used in an illegal gambling operation. With one exception, the weapons purchased by the undercover operative had their identifying serial numbers defaced and obliterated prior to delivery.

Investigators traced some of the guns to John Zodda, a federally licensed firearms dealer, who has been described by law enforcement authorities as one of the largest single gun traffickers ever arrested in New York. In November 1992, Zodda was convicted on eight counts and sentenced to 30 months in federal prison.

#### **Conflict of Interest ("High Finance")**

In August 1992, Comptroller Elizabeth Holtzman's Senate Campaign Committee, formed in connection with her unsuccessful run for the United States Senate, received a \$450,000 loan from Fleet Bank, a subsidiary of Fleet Financial Group. Ms. Holtzman personally guaranteed the loan. Seven months later, upon the recommendation of the Comptroller's Office, Fleet Securities, a sister subsidiary, was named as one of 23 co-managers of the City's multi-billion dollar municipal bond sale.

DOI commenced an investigation in May 1993, at the direction of the Conflicts of Interest Board, into ethical issues involving the permissibility of the loan, and conflict of interest issues concerning Fleet's subsequent appointment as a City underwriter.

A report, issued in September, found that the loan to Holtzman's campaign committee was not excluded from the charter's ethics proscriptions because she was not the recipient. However, the report concluded that by guaranteeing the loan, Holtzman entered into a financial relationship with a subsidiary of a company doing and actively seeking business with her office. It also found that Holtzman participated in the process leading to her office's recommendation and selection of Fleet Securities as a co-manager and that Holtzman was grossly negligent by failing to ascertain whether FFG or any of its subsidiaries was doing or seeking business with her office before her campaign committee sought the loan from Fleet Bank and before she participated in the selection process.

#### **DOT Maintenance Yard ("Highway Robbery")**

In November 1993, following an investigation into allegations of corruption and misconduct at the DOT Bureau of Highways' Flatlands Avenue Yard in Brooklyn, eight employees, including the Borough Supervisor in charge of the Yard, were arrested on charges of theft of equipment and materials and submitting falsified time records. The arrests coincided with the release of a 32-page report detailing thefts (including a paving roller and asphalt spreader and paving materials), flagrant misuse of tens of thousands of dollars in toll tokens and tickets, performing private paving jobs on City time — even earning overtime for the hours spent on the private work, inadequate security at the Yard, and the lack of inventory controls over the more than \$21 million worth of materials and equipment stored at the Yard.

The Flatlands Avenue Yard is responsible for all street repair and repaving in Brooklyn. The report, which concluded that the Yard operated like an independent fiefdom, contains 36 recommendations for corrective action in the areas of inventory control and management, control over leave and time and control over disbursement of toll tokens and tickets.

### Security and Control Deficiencies at Pier 76 ("Tow Pound")

A 75-page study of the operation and security of private property at the Department of Transportation's tow pound, located on 12th Avenue between 34th and 38th Streets in Manhattan, was issued in February 1993. One hundred thousand cars are towed annually to Pier 76, the City's largest vehicle storage and redemption center. The study found a series of problems, including unmonitored surveillance, defective perimeter fencing, inadequate lighting and a deficient data information system.

Images from 12 closed circuit cameras, installed to deter theft, were projected to an empty, and even, locked room. The defective perimeter fencing, where metal ties that bind the fencing to vertical and bottom horizontal metal poles were missing in many areas, allowing unrestricted access to all areas of the pound. Lights in crucial areas throughout the pound were not repaired or replaced, and in one month during the study, 300 bulbs in the 1200 light fixtures needed to be replaced. Inaccurate and incomplete data was entered into the automated Tow Pound Information System, which keeps track of vehicles stored at the pound, creating a risk that vehicles not entered into the system may be released after the payment of a bribe.

DOI made 35 recommendations for corrective action and DOT has implemented most of them.

## APPENDIX A

## PUBLIC AWARENESS CAMPAIGN

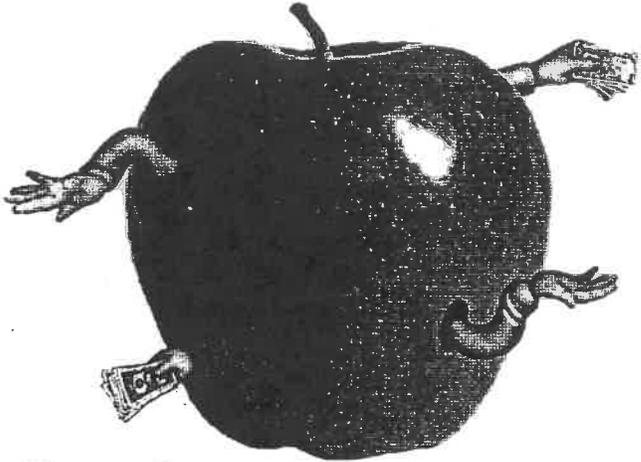
**D**OI relies upon City employees, people who do business with the City and the public at large to report corrupt activity that they see or hear.

Beginning in November 1992, DOI launched a multi-media public awareness campaign aimed at increasing the information the agency receives from City employees and the public:

- 2500 four-color posters, in the English and Spanish languages, were displayed on the City's subways over a two-month period.
- 9,500 of these posters were displayed in City offices, and the offices of City contractors.
- Radio spots were aired in November 1992 on stations WMXV-FM, WLTV-FM, WINS-AM, WYNY and WNYC. In the summer of 1993, two new pre-recorded spots were aired on the same stations.

- An insert carrying a reproduction of the poster accompanied all City paychecks distributed on January 29, 1993.
- For several months, an electronically reproduced version of the poster was broadcast approximately every 10 minutes on Channel 73, part of the City-owned Crosswalks Network.
- All Inspectors General, and members of the Executive Staff, visited community board meetings during the public awareness campaign to discuss DOI's work and its interest in receiving information from the public.

DOI received between 175 to 200 telephone calls a month linked directly to the campaign. The New York advertising firm of Avrett, Free & Ginsberg contributed its services pro bono in designing the poster and writing the radio spots.



**Get the worms out of  
the Big Apple.**

If you know someone who is ripping off the City, call this number:

**212-3-NYC-DOI**  
(212-369-2364)

David N. Dinkins  
Mayor



Susan E. Shepard  
Commissioner of Investigation