

In Memory of Deputy Mayor Carol Robles-Román



With great sorrow, OATH marks the passing of Carol Robles-Román, the former Deputy Mayor for Legal Affairs and Counsel to Mayor Bloomberg. Her vision and passion for equal justice improved accessibility, transparency, and accountability in the City's administrative justice system. Ensuring the public's access to justice was a top priority for Ms. Robles-Román, and under her leadership, the City made significant improvements to streamline its procedures, increased the use of technology, and expanded language access at administrative tribunals and OATH. She led the efforts to consolidate tribunals into OATH and create and implement an electronic system that allowed New Yorkers to contest their summonses and file appeals

online. She also created uniform ethical standards citywide by implementing a new code of conduct for all administrative law judges and hearing officers and spearheaded the creation of the Administrative Judicial Institute (AJI).

In 2004, Deputy Mayor Robles-Román led efforts to place a referendum on the ballot to change the City's Charter that would establish a uniform code of conduct to govern the actions of all city administrative law judges and hearing officers, across the City's various tribunals such as the tribunals at the Health Department and Department of Consumer Affairs, the Environmental Control Board, the Taxi and Limousine Tribunal, the Office of Administrative Trials and Hearings, and others. Testifying before the City Charter Revision Commission, Deputy Mayor Robles-Román emphasized that the impetus for creating a code of conduct did not stem from allegations of unethical behavior against City's ALJs or hearing officers. Rather, there was a general consensus that the administrative justice system could benefit from this reform so that ethical standards would be clear, consistent, and uniform, despite the somewhat fragmented nature of the city's adjudicative process at the time. On election day on November 8, 2005, the ballot initiative was overwhelmingly approved.

A little more than a year later, on February 13, 2007, the new ethics rules for City ALJs and hearing officers became effective. The text of the rules, Rules of Conduct for Administrative Law Judges and Hearing Officers of the City of New York, is found at 48 RCNY Appendix A and is on the [OATH website](#). Deputy Mayor Robles-Román was deliberate when basing the Rules on the Code of Judicial Conduct for the New York State Unified Court System. An innovative provision of the code is Section 103(A)(8), which codifies case law that sets forth judicial obligations to "take appropriate steps to ensure that any party not represented by an attorney or other relevant professional has the opportunity to have his or her case fully heard on all relevant points." That provision functions like a useful checklist that guides judges and hearing officers in their daily work. Indeed the provision serves as a model for other

jurisdictions and was adopted by the New York State Bar Association in its model code of ethics for New York State Administrative Law Judges. The Deputy Mayor understood that a significant number of litigants appearing in administrative tribunals lack legal representation. It was her mission to enhance equal access to justice for the unrepresented to ensure that all parties would be fully heard. She also wanted to ensure that those with limited English proficiency could meaningfully participate in the hearing process. It was then that robust translation services were fully instituted at OATH. A few years later the Deputy Mayor would spearhead the Bloomberg Administration's work mandating access to language services by requiring all City agencies to provide interpretation services and translate all of their essential documents into at least 8 languages, creating the country's first-ever "language access mandate" with [Executive Order 120 in 2008](#).

In 2006, by [Executive Order No. 84](#), Mayor Bloomberg charged OATH with establishing and managing an institute that would provide training and professional development to the City's administrative law judges. Through a collaborative effort with Deputy Mayor Robles-Román and various tribunal heads OATH established the [Administrative Judicial Institute](#), an integral part of the City's system of administrative justice. Frank Ng, Esq., was named the first Director of the Institute, later followed by Hon. Raymond E. Kramer, an OATH ALJ. The Institute continues its mission today and interested readers of this newsletter can sign up to [join its mailing list](#) to stay abreast of current trainings, seminars and other offerings of interest to administrative law practitioners. The Executive Order also created a new mayoral office, the Administrative Justice Coordinator, to coordinate consistent standards that would enhance the operations of administrative tribunals. David B. Goldin, Esq. was appointed to serve in that inaugural position.

In 2007, Deputy Mayor Robles-Román began an effort to consolidate City administrative tribunals into OATH, significantly strengthening the role of OATH as the City's central administrative law court and leading OATH to become what it is today: the tribunal where virtually all City agencies file their administrative charges for trials in the case of complex administrative law matters, or for hearings, in the case of summonses issued to businesses and individuals alleging a violation of City rules or laws. Deputy Mayor Robles-Román recognized that having a centralized, professional, independent, and impartial adjudicative body that is separate and apart from the agencies that file cases with it for adjudication would enhance professionalism, efficiency, independence, and use of technology for those cases transferred from City administrative enforcement agencies to OATH. Her work enriched and fortified the professionalism, centrality, impartiality, and independence that were the hallmarks of OATH when Mayor Koch created it in Mayoral Executive Order No. 32 of 1979.

Deputy Mayor Robles-Román began with the Environmental Control Board (ECB) tribunal, which at the time was the largest administrative tribunal in the City in terms of caseload and was housed within the Department of Environmental Protection. The administration worked with the City Council to draft legislation which unanimously passed by the council and [Local Law 35](#) was signed into law by Mayor Bloomberg in 2008. For the first time, OATH began hearing summons-based cases issued by the Departments of Environmental Protection, Sanitation, Buildings, the Parks and Fire Departments, among other City enforcement agencies. In 2010, she led efforts to have a referendum placed on the ballot to change the City Charter to allow the Mayor to transfer administrative tribunals by Executive Order, another proposal that was overwhelmingly approved. In 2011, this allowed Mayor Bloomberg to sign [Executive Order No. 148](#) which transferred the Health Department's administrative tribunal and

the Taxi and Limousine Commission's administrative tribunal to OATH, among other types of cases.

With the unwavering support of Deputy Mayor Robles-Román, OATH continued to focus its efforts on expanding access to justice for New Yorkers for all the cases it heard. In 2011, OATH launched online hearings and appeals, and expanded hearings for summons cases from one hearing center in Manhattan, to hearing centers in all five boroughs, bringing the tribunal closer to the people. "For most New Yorkers, the first and only interaction with the judicial system will come in the form of an administrative proceeding. It is vital that we continue to make the hearings accessible and user-friendly for everyone that appears before our administrative courts," Deputy Mayor Robles Román said at the press conference to announce online hearings alongside Mayor Bloomberg and Council Speaker Christine Quinn.

Under Mayor de Blasio, OATH continued its forward momentum and took over the final two administrative caseloads the Deputy Mayor had originally envisioned be a part of the City's central, independent administrative law court – OATH. In 2016, OATH incorporated the caseload previously handled by the former Department of Consumer Affairs' administrative tribunal, and, in December of 2021, the State and City agreed to transfer the cases handled by the Department of Education's Impartial Hearings Office to OATH.

Deputy Mayor Robles-Román served all 12 years of the Bloomberg Administration. At the beginning of Deputy Mayor Robles-Román's tenure, OATH heard approximately 3,000 cases annually. Today, OATH processes more than 800,000 cases a year. Carol Robles-Román's contributions to OATH and to the City's administrative justice system writ large have been numerous and invaluable, changing the way millions of New Yorker's interact with the City's municipal justice system. Her legacy will live on through the momentous advancements she spearheaded. She will be sorely missed.