

Evictions and Building Conditions in Bronx Community District 6:

A Strategic Roadmap for Housing Security



BRONX
COMMUNITY
BOARD 6

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2023-2024 Planning Fellow



**FUND FOR THE CITY
OF NEW YORK**

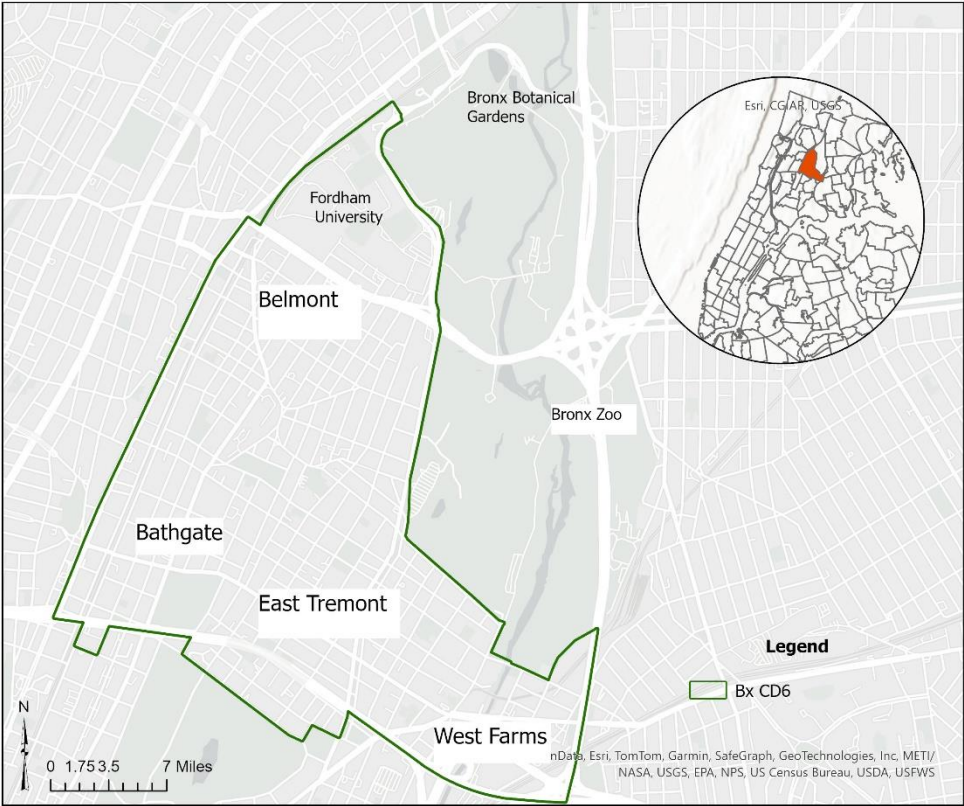
Summary of Key Findings

Key Findings

Recommendations

<p>Of tenants who were evicted for non-payment, only 7.5% had legal representation. This data point speaks to the lack of capacity and insufficient funding for the Right to Counsel legislation (p.7)</p>	<p>Advocate to expand city support of legal services and to properly fund Right to Counsel Initiatives (p.14)</p>
<p>30% of judgements in non-payment eviction cases were default judgements, defined as when a defendant does not appear for their court date (p.7)</p>	<p>An outreach strategy based on geography or the list of buildings with highest distress and evictions should be followed. Mailing 'Know Your Rights' pamphlets and communicating with residents in buildings that have high instances of code violations and are rent stabilized (p.tk)</p>
<p>The neighborhood of Belmont is subject to the most evictions (p.)</p>	
<p>For non-payment cases initiated in 2022, the median amount of rent claimed by landlords in non-payment cases was \$11,550 for CD 6 residents. By contrast, the median amount of rent claimed in New York City overall was \$6059 in June of 2022. (p.)</p>	<p>A long-term transformational strategy is necessary to provide a bulwark of protection for vulnerable renters, namely cooperative home ownership(p.tk)</p>
<p>The most class C building violations in Belmont occur in census tracts 385 and 393; 823 and 772 respectively, for a total of 1595. In East Tremont, census tract 363 with 866 violations and 373 with 782 violations, total slightly more at 1684 (p.)</p>	<p>Another method of targeted outreach involves focusing on buildings that were part of the Signature Bank Portfolio of buildings, now overseen by Community Preservation Corporation. These may have a higher possibility for CLT/cooperative ownership (p.)</p>
<p>The eviction rate for Community District 6 lies between 7.5% and 8.2%</p>	<p>Advocate for TOPA, COPA, and the original, much broader Good Cause legislation</p>
	<p>Push HPD to preserve, rather than develop</p>

Community District 6



Report Summary:

Robert Mose's destruction of communities to build the Cross-Bronx Expressway and federal agency red-lining activities of the past predispose present-day populations to precarious housing situations in Community District 6. The residents of Belmont, Bathgate, East Tremont and West Farms are mostly renters and live in areas where much of the housing stock was built before 1943. While socioeconomic challenges for residents make it difficult to pay rent and to challenge neglectful landlords, the Housing Court system exacerbates the problem with its own unique barriers to justice.

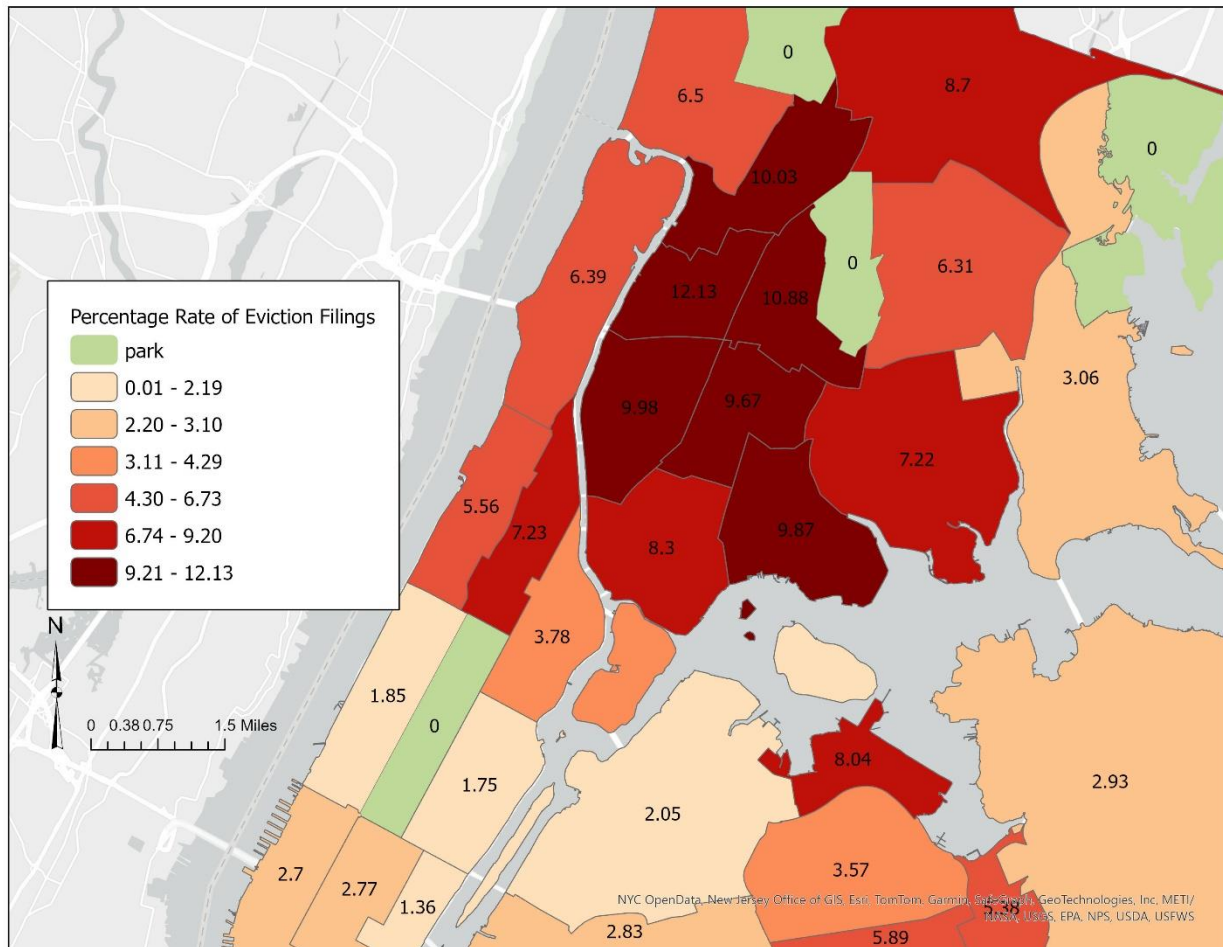
The impetus for this report was Community District 6's desire to understand the factors driving the highest residential eviction rates and second highest rate of immediately hazardous building violations that its residents experience. To create a snapshot in time of the present-day situation of evictions, data on default judgements, rent amounts claimed by landlords, and a tabulation of total eviction filings and executed evictions by zip code was collected from the New York State Courts Electronic Filing system for the year 2022. Interviews conducted with non-profit entities such as Housing Court Answers and Northwest Bronx Community and Clergy Coalition, as well as informal observations in court, gave human perspective to these figures.

The first goal of this project was understanding, the second, action; A path toward mitigating housing insecurity includes both short term and long-term strategies. In the short-term, educational outreach to people in their native language, before they get an eviction notice or regular monthly workshops sponsored by non-profits such as Met Council on Housing or Legal Services NYC are key. One finding of this report includes a list of highly distressed buildings where marshals have carried out evictions. These buildings should be targeted first for outreach. More transformational strategies are long-term and work from an offensive, rather than a defensive position. These include the mechanisms for renters to become less vulnerable to rent increases, such as the formation of tenant associations and pathways toward ownership. Tenant Associations could potentially work with community land trusts or the Department of Housing Preservation and Development to gain leverage against landlords and obtain overall control or ownership of their building.

Evictions Landscape: Community District 6

One of the main statistics that drove this report was that in 2022, Bronx Community District 6 ranked second highest in eviction filings with 108.8 per 1000 renter households out of New York City's 59 districts, according to the Association for Neighborhood and Housing Development. *This translates to an eviction filing rate of 10.88%.* From the map below, it is clear to see that the Bronx fares the worst relative to other boroughs.

Rate of Eviction Filings per 1000 Renter Households



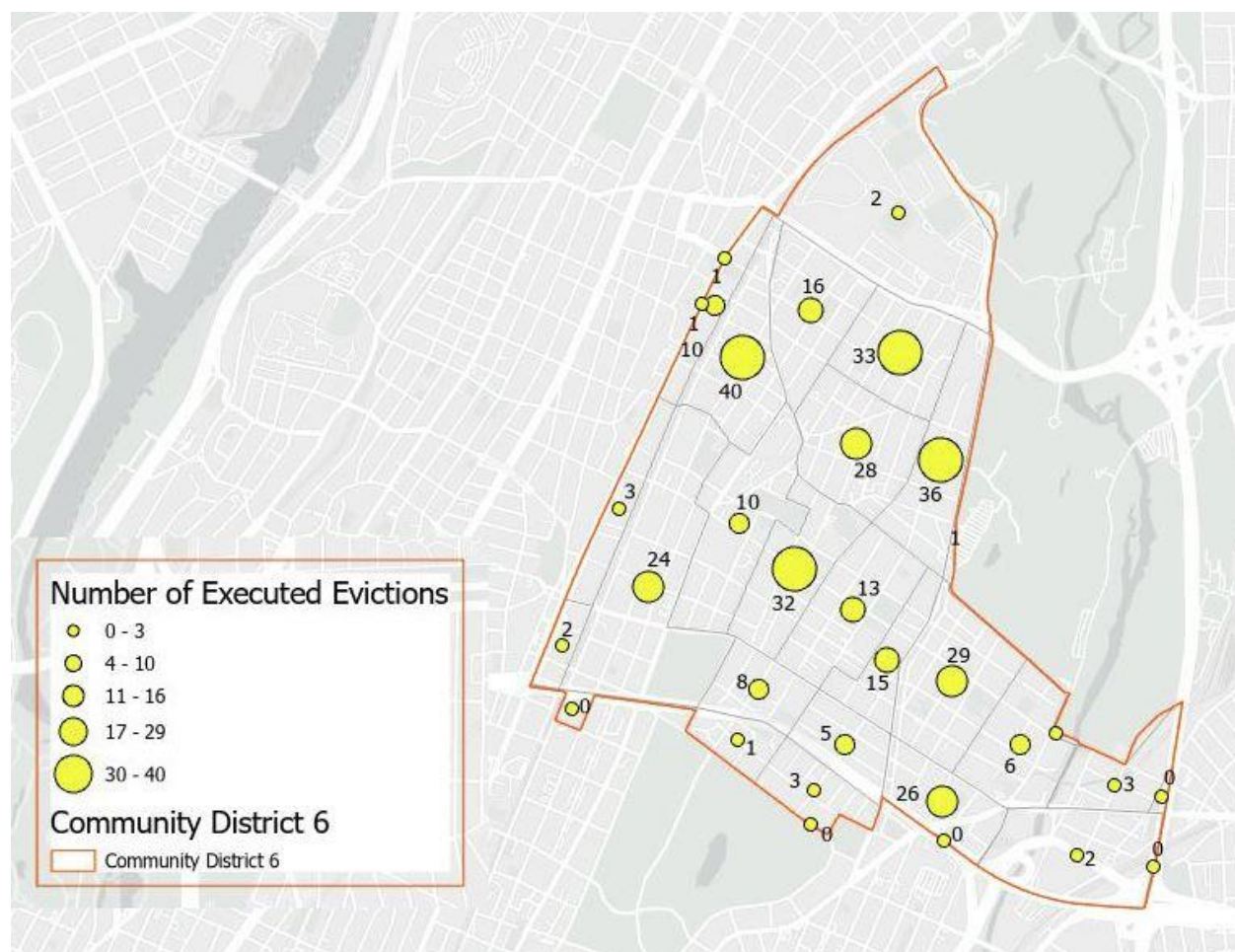
Bronx residents consistently experience three times the rate of evictions filings compared to Manhattan, and this remained the case, even during the eviction moratorium that lasted from March 2020 until June 2021.

YEAR BY YEAR EVICTION FILINGS AS A PERCENTAGE OF HOUSEHOLDS

County	2019	2020	2021	2022	2023	2024 through 9/23/2024
Bronx	13.23%	5.59%	3.08%	8.39%	10.45%	6.75%
Kings	5.38%	2.30%	1.26%	3.35%	4.04%	2.46%
New York	4.67%	2.04%	1.14%	2.73%	3.46%	2.25%
Queens	3.40%	1.68%	1.14%	2.58%	2.81%	1.77%
Richmond	2.47%	0.92%	0.61%	1.51%	1.67%	1.24%

Evictions Data from The Department of Investigation dataset DOI

The next step of this study took us to NYC OpenData where a list of executed evictions that had been initiated in 2022, were downloaded and mapped to census tracts in Community District 6. Census tracts in Belmont are the hardest hit, with 40 executed evictions in tract 385, 36 in 393, 33 in 389, and 28 in 391. (Note- tract 385 may be considered Bathgate) In West Farms, census tracts with high numbers include tract 363 with 29 and tract 359 with 26. East Tremont has 32 executed evictions in census tract 373. Bathgate, census tract 395 has a total of 29.



There are macroeconomic issues, such as low wages, that work against CD 6 residents who struggle to pay their rent, predisposing residents to the high rates of eviction but it must be

noted that these conditions do not necessarily lead to evictions. Landlords and LLC's, ultimately decide to file eviction proceedings and then tenants are faced with a new set of conditions within the court system to navigate.

Housing Court Data Findings

A sample of 139 residential non-payment court cases were analyzed for whether or not the tenant had legal representation, whether or not the case was issued a default judgement, and the amount of rent claimed by landlords.

Only 7.5% of tenants in Community District 6 with non-payment cases who were evicted had legal representation. This data point speaks to the daily scenario where the court clerk, as a rule offers those present the option of speaking with a lawyer about their case, but does not promise full legal representation. "Capacity concerns meant that people who otherwise would qualify for legal representation, would only get legal advice.ⁱ While Right to Counsel laws technically provide lawyers for free to those households earning under 200% of the Federal Poverty Line, the number of cases since the end of the eviction moratorium has ballooned and judges unfairly place the burden on these lawyers to address the backlog of cases. As a result, there are more cases than a lawyer can conceivably handle and not everyone who needs representation, gets it. The Community Services Society report, "Right to Counsel Works-Why Won't the City and State Use it to Stop More Evictions," highlights that legal service providers have budgeted the actual cost of representation to be 235 million for 2023, while the city has only budgeted 110 million per year for civil eviction defense.ⁱⁱ They predicted that their caseload for 2024 would be 71,000, costing \$336 million to cover. Lack of funds also plague organizations like Housing Court Answers, an organization that has onsite kiosks at court. Jennie Laurie, Executive Director of Housing Court Answers, stated that they only have the funds to be in Housing Court three days a week, when the need is for them to be there five days a week to help tenants navigate the court system. An additional problem is the potential for Spanish-speakers to miss the opportunity for representation. Every instance of visiting the court, this author witnessed the court clerk asking if anybody in the courtroom could translate for him, into Spanish, the offer of having a lawyer calling the resident to provide legal advice.

The organizations that represented tenants in Community District 6 included Neighborhood Association for Intercultural Affairs (NAICA),(in 5 cases) Legal Services NYC in 3 cases and The Bronx Defenders and the Urban Justice Center with one case each.

Overall rates of representation for all eviction cases (not just executed evictions) going through Housing Court in the Bronx, were 40% in the last quarter of 2023, as reported by the Office of Civil Justice’s Report on Universal Access to Legal Services. ⁱⁱⁱ Landlords or LLC have access to lawyers 99% of the time.

30% of judgements in non-payment eviction cases were default judgements. This figure is significant because it represents a gap in people’s knowledge about their rights as tenants. These residents do not go to court after receiving a notice of eviction. Perhaps they are scared into leaving immediately or do not understand how to address the notice. This leads to the question of how to reach this segment of the population with the knowledge they need to have a chance to remain in their homes.

In CD 6 median amount of rent claimed by landlords in non-payment cases was \$11,550. In June of 2022, the median amount of rent claimed in New York City overall was \$6059. This figure speaks to the months of unpaid rent that accumulated during the eviction moratorium. There is no demographic data connected to the evictions records, but CSS’s Unheard Third Survey results show that one in every 5 Black households and 1 in 4 Latino households reported owing back rent in 2023 in New York. ¹

The eviction rate for Community District 6 lies between 7.5% and 8.2%. This rate is slightly lower than the overall rate for the Bronx, which was 8.4% for 2022, when our sample was taken. One aspect of evictions that is not captured in this data is “perceived evictions attempts” - which include informal and illegal attempts at eviction. ^{iv} P.7. There are many instances when a person who has paid their rent on time is brought to court numerous times in non-payment cases. As in the example of one tenant who attended the workshop given by Community Board 6, it takes some time to realize that this is a form of tenant harassment. Landlords and LLC’s pursue ‘frivolous eviction cases’ in order to push residents out of rent-stabilized units.

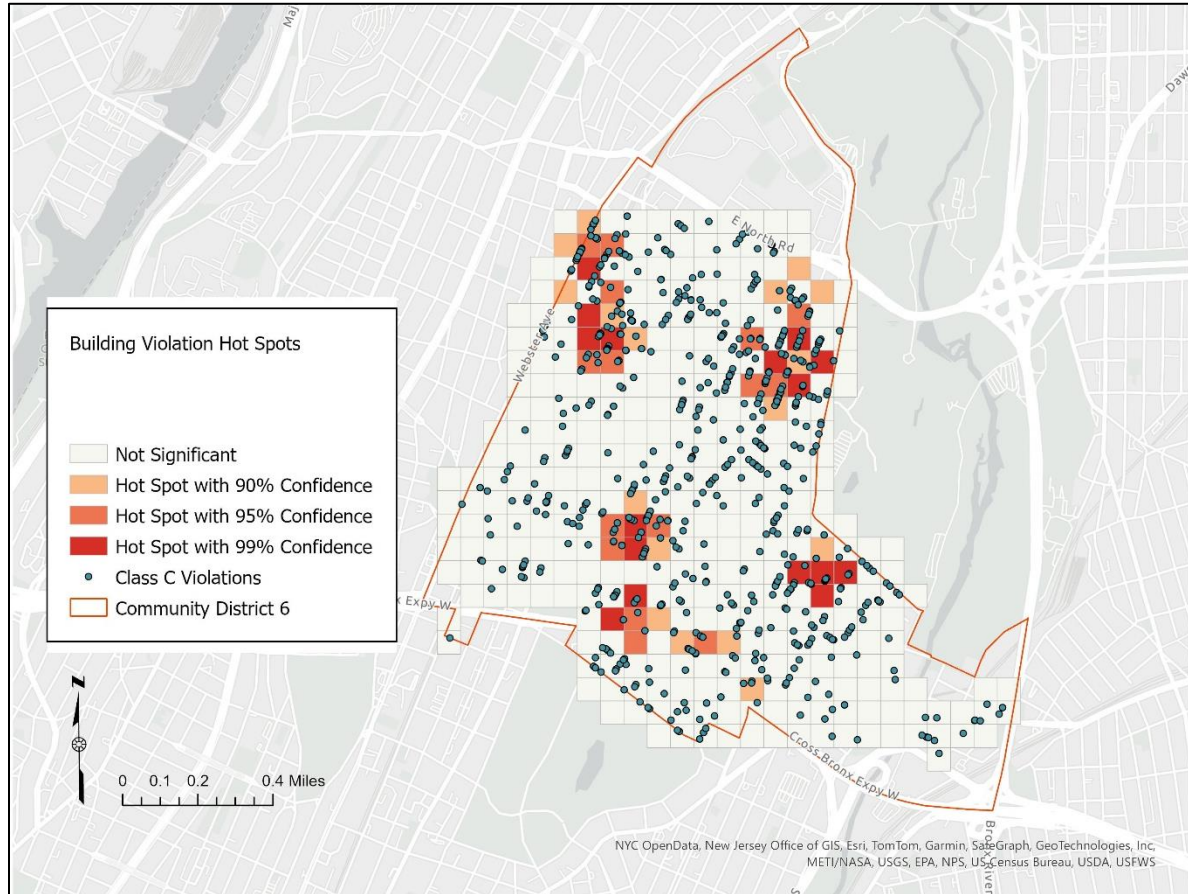
Building Violations Landscape

The second statistic that served as the impetus for this report was ANHD’s reporting that for every 1000 units of housing in CD 6, 244.3 units have an immediately hazardous building code violation, or approximately 25%. The map below shows Class C violations reported in 2022 in the Housing Maintenance Code Violations dataset maintained by HPD. A hotspot analysis shows that there are statistically significant spatial clusters of building violations. These spatial clusters occur in Belmont, in census tracts 385 and 393 with 823 and 772 violations respectively, for a total of 1595. Of note is that tract 385 also is a hotspot for evictions (with 90% confidence).

¹ CSS p.2

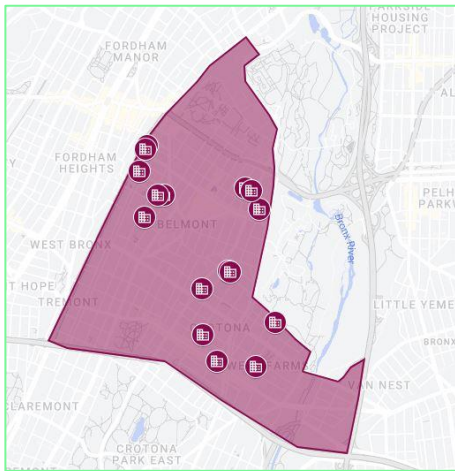
Another statistically significant spatial clustering occurs in West Farms, Census tract 363 with 866 violations. In East Tremont, the areas of significance lie within Census Tract 373 with 782 violations, and Census Tract 369.01 with 455 violations.

Class C Building Violation Hot Spots



More formal research needs to be done to understand why Class C violations are high in these specific instances, but it is generally understood that landlords and LLC's sometimes intentionally do not maintain their buildings because they want to drive out rent-stabilized tenants so that they can eventually convert a rent stabilized unit to a market rent unit. Additionally, corporate owners of buildings make it more difficult for renters to access management; There is no longer a superintendent living in the building to deal with repairs in a timely manner. 89% of all units registered with the Department of Housing Preservation and Development ("HPD") across the City list a corporate owner.⁹ If tenants do not speak to each other, they may not know that they are experiencing common problems. They may also feel that if they speak up, the landlord will attempt to evict them.

One database that incorporates building violations into its assessment for the distress level of a building is the Building Indicator project, from the University Neighborhood Housing Program. Additionally, it factors in the amount of the lien (or money owed to the city) and the amount of the mortgage, when it calculates a distress score. Below is a list of the 16 buildings that originally came from a dataset of 299 executed evictions and also appeared on the Building Indicator Project's list of distressed buildings.



Address	Owner
684 East 189 th Street (2 evictions-)	Ari Koth, 189 th St LLC
739 East 182 nd Street (2 evictions)	LUM PELINKOVIC
2000 Prospect Avenue	Robert Kasovitz Prospect 2000 Realty
505 East 184 th Street (4 evictions)	Ramon Ariza, 505 Equities
2420 Webster Avenue	Joseph Safdie, Webster ICE LLC
490 East 184 th Street	Stephen Crawford, BX 490 LLC
2470 Beaumont Avenue (2 evictions)	David Manheimer, Fordham Portfolio LLC
1968 Marmion Avenue/851 Tremont Ave (2 evictions)	Salvatore Davola, Neighborhood Restore HDFC
735 East 182 nd St	Isaac Mandelbaum, 735 Equities LLC
2120 Crotona Avenue	David Haynes, Bronx 2120 Crotona Ave LP
900 Bronx Park South	David Tennenbaum, 900 BPS LLC
2408 Webster Ave	Joseph Safdie, Webster ICE LLC
2429 Prospect Avenue	Joseph Safdie, Prospect Ave 2429 LLC
2000 Daly Avenue	Nilda Sastre, 2000 Daly Ave HDFC
2235 Bassford Avenue	Ari Bernstein, 2235 Bassford Partners LLC
4589 Park Avenue	Aaron Rivlin, Park Properties 4585-9

While the age of a building can be pointed to in terms of whether or not a building is predisposed to disrepair, it is important to remember that it is ultimately the landlord and LLC president that is responsible for repairing and maintaining it.

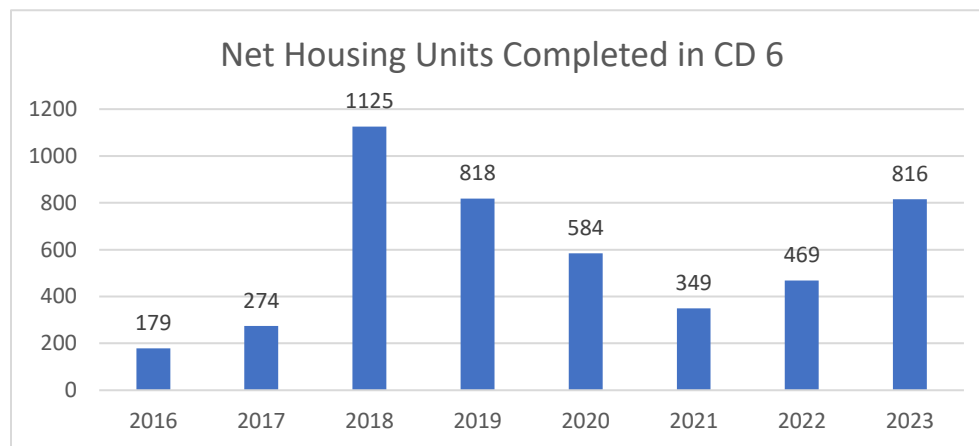
Upon examining a table that shows the number of evictions executed, class C building violations percentage of rent burdened households, and age of buildings, one can at least see the census

tracts most in distress. In the majority of census tracts, there is no correlation between these different variables. At the same time, it shows that it is worth considering a tenant organizing strategy in census tracts 385, 389, and 359.

Census Tract	Evictions Executed	Building Violations	% HH paying 35% or more	Pre-1939
60	2	56	65.5	71.4
220	3	71	53.6	45.3
359	33	313	69.6	23.1
361	6	167	42.3	15.6
363	29	866	53.2	39.2
365.01	15	395	38.7	36.9
365.02	5	284	60.6	52.6
367	3	235	63.2	36.9
369.01	8	455	51.5	23.3
369.02	1	92	54.9	24
371	13	273	45.8	25.5
373	32	782	57.9	26.1
375.04	10	212	48.1	22.8
383.04	12	349	49.5	71.1
385	40	823	61.6	54.4
387	16	290	61	69.6
389	33	493	60.2	68.5
391	28	531	47.9	64
393	36	772	56.1	49
395	29	388	56.6	27
397	2	8	46.1	53.2

Housing Production Landscape: A Mismatch to Need

According to the NYC Housing Production Snapshot of 2023, the Bronx accounted for 35% of all new housing completions, the first time in years leading all boroughs in housing growth. While most of these were in the South Bronx, the area represented by Community District 6 saw 816 new housing units completed.² 340 of these units were part of New York City's affordable housing production undertaken by HPD.³ This means that 42% of all new housing units produced were defined as affordable, while 58% were market rate. It is important to note that none of the units were for home ownership. This is an important point because home owners are more insulated from becoming unhoused than renters.



<https://storymaps.arcgis.com/stories/6ddac8463c0d444e9c488a11b8d6a0af>

The units produced by HPD, while technically defined to be affordable, do not match the household income earnings of the majority of residents. Of the units built, **none were for households earning 0-30% or 31-50% of the area median income.** 27 units were for low-income households earning 51-80% of AMI, none for moderate income earners, defined as earning 81-120% of AMI, and a whopping 313 units were built for households earning 121-165% of the area median income.

To understand why this is problematic, it is necessary to examine the income bands of people living in Community District 6. While the public use microdata combines CD 6 with CD3, we get a good enough idea of the housing landscape: **Only 3.4% of households in CD 6 and CD 3 earn enough income to be able to afford one of those 313 units built for this income band. The**

² <https://storymaps.arcgis.com/stories/6ddac8463c0d444e9c488a11b8d6a0af>

³ Affordable Housing Production by Building, data provided by The Department of Housing Preservation and Development, NYC Open Data

majority of households in CD 3 and CD 6 earn 30% or less than the Area Median Income, yet no units were built for this population. ⁴

<https://anhd.org/report/testimony-new-york-city-council-committee-housing-and-buildings-regarding-2023-housing>

- A majority of households in zip code 10457, 10458 and 10460 are rent burdened. In zip code 10457, 60.1% of households pay more than 30% of their income on rent. In 10458, this figure is 64.3% and in 10460, 62%.

In zip code 10457, the rate of home ownership is 6.3%. In 10458, it is 4.2% and in 10460, 10.2% (DP 04) 2022 ACS 5-Year Estimates)

	2008- 2012	2017-2021
Rent Burdened (paying 30% or more of income in rent)	63.6%	63.5%
Extremely Rent Burdened (paying 50% or more of income in rent)	37.6%	38.2%

Gross Rent as A Percentage of Household Income-

⁴ <https://equitableexplorer.planning.nyc.gov/data/district/3705/econ/tot>

Key Recommendations:

Strategic Outreach

- It is impossible for the community board to know who has received an eviction notice unless those members come to a meeting and inform them, but a targeted outreach strategy would entail mailing ‘know your rights’ pamphlets and communicating with residents in buildings that have high instances of code violations and are rent stabilized. It is important to not scare people who may have not received an eviction notice, as acknowledged in conversation with CD 6 District Manager, but informing people of their rights in mailers in the context of community events is one way to approach the issue.
- **Target the residents in buildings where there have been both evictions and indicators of high distress.**
- **Target the Signature Portfolio of buildings where there might be an opportunity for residents to purchase the building.**

Address	
2086 Vyse Avenue	Genesis Realty Group (Jac Zadrina)
4648 Park Avenue (25)	Atlantic Development Group (Peter Fine)
400 East 187 Street (5)	Genesis Realty Group (Jac Zadrina)
518 East 187 Street (2)	Prana Investments (Rick Herman)
2324 Beaumont Avenue (9)	
655 East 183 Street	Alma Realty (Steve Valiotis)
2478 Arthur Avenue (0)	Anahid Hatzigeorgiou
2265 Hughes Avenue (2)	Genesis Realty Group (Jac Zadrina)
2378 Webster Avenue	Genesis Realty Group (Jac Zadrina)

2380 Webster Avenue	Genesis Realty Group (Jac Zadrima)
463 East 185 Street	Genesis Realty Group (Jac Zadrima)
663 Crescent Avenue (5)	Prana Investments (Rick Herman)
1997 Daly Avenue	Yaakov Deckelbaum
566 East 187 Street (6)	Prana Investments (Rick Herman)
576 East 187 Street (3)	Prana Investments (Rick Herman)
2008 Hughes Avenue (2)	Genesis Realty Group (Jac Zadrima)
540 East 183 Street (1)	Genesis Realty Group (Jac Zadrima)
404 East 175 Street (2)	Uri Dreifus
865 East 181 Street (4)	Prana Investments (Rick Herman)
666 East 181 Street (5)	Genesis Realty Group (Jac Zadrima)
452 East 187 Street (16)	Chaim Abramson
4575 Park Avenue	Moshe Piller
2237 Bathgate Avenue (1)	Jacob Jacobowitz
2340 Beaumont Avenue (11)	Camber Property Group (Rick Gropper)
2322 Crotona Avenue (4)	Jacob Jacobowitz
502 East 183 street	

HPD Neighborhood Pillars Program-provides low-interest loans and tax exemptions to nonprofits and mission driven organizations to acquire and rehabilitate unregulated or rent stabilized housing for low- to moderate-income households.

Create and Maintain a relationship with Northwest Bronx Community and Clergy Coalition and HPD

HPD has a relatively new program called **Partners in Preservation** through its Tenant Engagement and Special Projects Division. This program's aim is to strengthen and support tenant organizing. Northwest Bronx Community and Clergy Coalition is the Bronx based contractor for the program. Community Board 6 should remind HPD and NWBCCC that there is an urgency in bringing tenant organizers to their district. Forge and maintain a relationship with these entities to have an additional source of tenant association workshop trainings and Know Your Rights Trainings.

Advocate for more funding for Universal Access to Legal Services

An

[A Long-Term Transformational Endeavor- The Case of 785 East Tremont Avenue.](#)

This report recommends a long-term strategy of tenant organizing, so that residents of Community Board 6 can resist landlord pressures, rising rental costs and ultimately have control over their housing. Below is the story of one such group of residents who live at 785 East Tremont Avenue. This case study shows how a group of tenants, using present- day financial tools, will finance a distressed tenant-owned building, converting it to a limited equity cooperative/ Community Land Trust model and expand democratically controlled housing.

Context:

785 East Tremont was originally intended to be one of the eleven hundred Housing Development Finance Corporation (HDFC) limited equity cooperative success stories of the 1980s and 90s. Instead, residents ultimately found themselves in a building that had lost its tax-exempt status due to mismanagement. The city had sold the debt to a tax lien trust whereupon the building was sold at auction.

Hypothetical paths to Tenant Control of Building

1. Start: Tenants threatened with loss of domicile because of rent hikes by landlords or intimidation practices, eviction pressures and speculative development. Building conditions are challenging
2. Tenants form an association, exchanging their living experiences in the apartment and interactions with landlord. This task is easier said than done, but
3. If tenants find that they have all tried to contend with getting repairs done in the building, there are multiple strategies to pursue-
 - a. **Disruption**- find the residence of the landlord or LLC, organize a protest, calling attention to the landlord's unresponsive behavior to the media as a form of pressure. Other forms of disruption include calling attention to the landlord's bad behavior in the community. For example, one building's tenants put up letters in their windows that



spelled out:
Slumlord: Don't Rent Here⁵

Edward Garcia of NWBCCC makes the point that going to court to sue the landlord should not be the go-to strategy because of the potentially long drawn-out process, that the tenant association see if landlord will make necessary repairs without going to court. All tools should be considered.

- b. Instead of each individual going to court to initiate an HP action, pursue a group HP action. This is when several tenants file one case together against the landlord. These

⁵ Tenant Organizing Manual NYC-DSA Housing WG. February 2018.

can be taken more seriously. They also, however, should involve outside support such as non-profit legal services such as Take Root Justice.

- c. Another
4. If the tenants have formed an association, and they are interested in having controlling ownership of the building, they should consider the following: is it an individual landlord who has a large mortgage? Inquire whether or not the landlord would be willing to sell the building to the tenants.
5. **HPD Neighborhood Pillars Program**-provides low-interest loans and tax exemptions to nonprofits and mission driven organizations to acquire and rehabilitate unregulated or rent stabilized housing for low- to moderate-income households.
6. **Policies to Fight For/Support--**

Appendix A.

Rent Burden

The percentage of households experiencing rent burden in Community District 6 is 63%. A closer look at rent burden by census tract shows where the most rent burdened households are.

Percentage of Households paying 35% or more of their Income on Rent

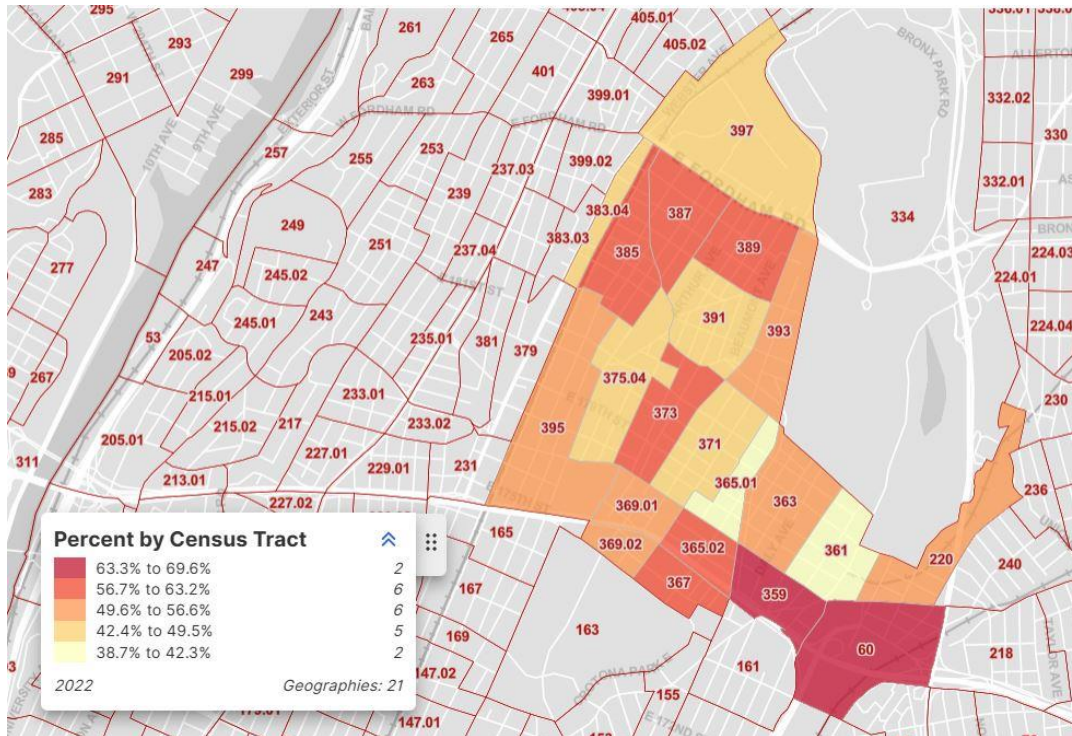


Fig 2. American Community Survey 2022: 5-Year Estimates DP04 Selected Housing Characteristics

It is important to note that even in the census tracts with the lightest color, at least 38.7% of households are rent burdened. In census tract 359 and 60, which cover the neighborhood of West Farms, 63.5% of households are rent burdened. Between 56.7% and 63.2% of households in Belmont, (census tracts 385, 387, and 389) are rent burdened.

Census Tracts with the most evictions are 385, 393, 389, 373, 363, 359, with 40, 36, 33, 32, 29, and 26 evictions respectively.

Census tract 60 has 2 executed evictions. This in part, is due to the concentration of home owners, the highest level of home ownership in District 6. Just to the west, tract 359 has 5.7% level of home ownership, and 26 executed evictions

Appendix B- Age of Building Stock

The age of a building in and of itself does not determine whether or not a building will receive violations, but the experiences of many renters living in buildings built before 1939, which are rent-controlled, have stories of neglectful landlords making minimal or patchwork repairs, never addressing the building's root problems that come with age. An analysis of census tracts showed that Belmont and West Farms in particular, have old housing stock, with over 60% of buildings

built in 1939 or earlier. Overall, 10 of the 21 census tracts in Community Board 6 have 40% or more of their buildings built in 1939 or earlier.

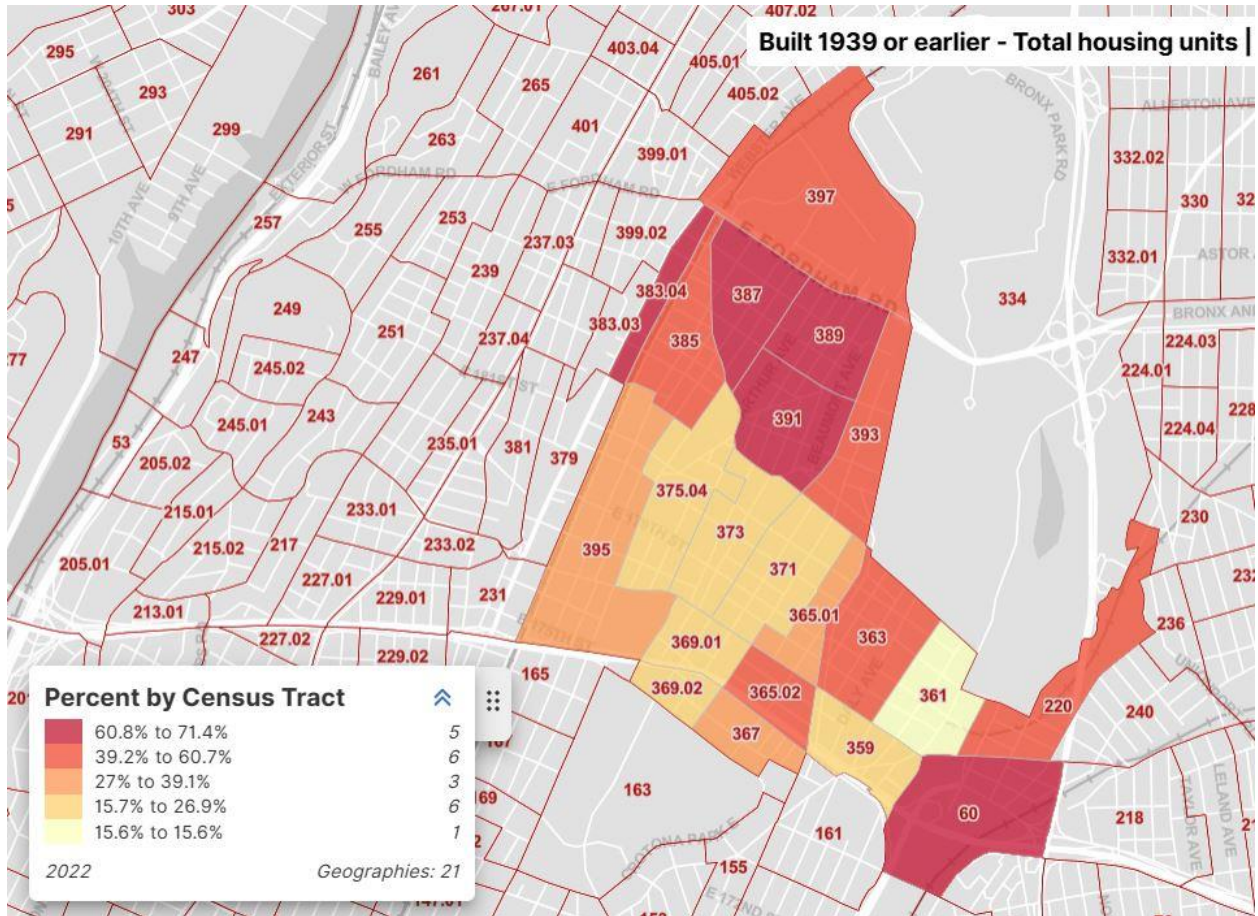


Fig 2. American Community Survey 2022: 5-Year Estimates DP04 Selected Housing Characteristics

Methodology

To arrive at the figures for rate of legal representation, percentage of default judgements, median amount of rent claimed, as well as the average for Bronx Community District 6, the following steps were taken:

1. In 2023, Community Board 6 downloaded the data set of executed evictions from 2017 to the present. provided by the Department of Investigation and compiled from the majority of New York City Marshalls and hosted by the City of New York Open Data website, https://data.cityofnewyork.us/City-Government/Evictions/6z8x-wfk4/about_data. Of this collection, a sample of residential eviction court cases initiated in 2022, as indicated by the Court Index number were chosen for analysis.
2. With Court Index numbers in hand, a search in the New York Unified Court System's E-Courts Database, in Bronx Housing Court, provided information on whether or not the tenant represents themselves, the amount of rent claimed by the landlord, and if a default judgement was issued.

To compute the eviction rate for CD 6 the following steps were followed

1. First, a search for the total number of evictions cases initiated by street name in the zipcodes of 10457, 10458, and 10460 was done on the New York Unified Court System's E-Courts Database. For example, East 183rd St in zipcode 10457 was searched.
2. The results were then photographed and counted, and then verified to see whether or not the specific address lied within district 6. Addresses outside the boundaries of District 6 were excluded
3. The resulting number of total evictions processes then served as the denominator. The number of executed evictions in the sample was then divided by the total number of evictions cases

ⁱ Office of Civil Justice. New York City Department of Social Services. Winter 2023. Universal Access to Legal Services. A Report on Year Six of Implementation in New York City. p.7-

ⁱⁱ Oksana Miranova, Samuel Stein, Izhiah Thomson.Right to Counsel Works, Why Won't the City and State Use it to Stop More Evictions, January 2023. p. 5.Community Services Society, p. 5.

ⁱⁱⁱ Office of Civil Justice. New York City Department of Social Services. Winter 2023. Universal Access to Legal Services. A Report on Year Six of Implementation in New York City.

^{iv} Oksana Miranova, Samuel Stein, Izhiah Thomson.Right to Counsel Works, Why Won't the City and State Use it to Stop More Evictions, January 2023. p. 5.

^v (<https://medium.com/justfixorg/corporatization-of-nyc-real-estate-83e2bf191b73>)