

**COMMISSION TO PROMOTE PUBLIC CONFIDENCE  
IN JUDICIAL ELECTIONS**

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**Appendix D**

**Committee for Modern Courts September 2, 2003 Memorandum**

**To The Commission**

**Initial Comparative Research of Accessibility to the Public of  
Candidate Campaign Finance Information at the New York City,  
Westchester and Nassau County Board of Election  
Offices**



## MEMORANDUM

To: Nicole Gordon & Craig Landy  
Cc: Ken Jockers & Jane Eggers

From: Chris Cesarani

Date: September 2, 2003

Re: Initial Comparative Research of Accessibility to the Public of Candidate Campaign Finance Information at the New York City, Westchester and Nassau County Board of Election Offices

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The following document represents a compilation of observations and information collected by summer interns Danielle Brogan, Kevin Kim and Alex Vanderweide. On four separate occasions, these interns visited the New York City, Westchester, and Nassau County Board of Election offices. The interns recorded their observations in the form of a narrative journal and then reflected upon particular aspects of their experiences with a rated checklist.

The attached narrative and ratings clearly portray a lack of uniformity in the accessibility of candidate campaign finance filings to the public. Moreover, requesting and reviewing candidate campaign financial filings was a cumbersome process. For example, although some filings could be submitted electronically, the interns were unable to review the same filings through a computer. Instead, the process generally involved filling out a form pursuant to the Freedom of Information Law (FOIL) to request paper files. Furthermore, in some instances the interns were informed that they could only request and review one candidate's file at a time. Other times they had to await the presence of an observer before they could review files.

The interns also observed varying levels of resources available to the different boards of elections visited, as well as variant conditions within the public facilities. Certainly, processing candidate election and campaign finance filings is the primary concern of the board of election offices. However, the procedural, staff and facilities related difficulties that the interns encountered during their trips to the boards of elections are disconcerting.

Making the completed filings available to the public should be a function of the resources and procedures in place at the boards of elections.

## **INTRODUCTION**

The judicial selection group, comprised of Danielle Brogan, Kevin Kim, and Alex Vanderweide, visited the board of elections of the following counties: New York, Nassau, and Westchester. The purpose of the visits to the boards of elections was to determine what resources and information are available to the public and to candidates in each of the respective counties. In our attempt to quantify this information, we used a checklist (see attached) to systematize the information that we gathered at each office. We asked the employees certain questions about the office (the number of employees, the volume of filings in the office, etc.), and also gave subjective scores (both in rank and narrative form) to other categories.

## Questions & Checklist for Board of Elections Visits

**1. Are the files complete?**

- a. Does someone check the files for compliance?
- b. If they are not complete, does someone contact the candidate, what happens?

**2. What is the technology like here?**

**3. What is the demand for these files?**

- a. Who comes in, what types of people ask for files?
- b. What is the volume of judicial filing at this board?
- c. How many judicial races are there in a given year in this county?

4. Are papers usually filed on time? How assessed – stamped / dated? Is there a follow-up on non-compliance?

5. Staffing – Number of employees, is this office adequately staffed?

6. How do candidates file? (Walk in, internet, by mail?)

I. High-Low Ratings: 1-4 lowest rating and 16-20 highest rating

**A. 1-5 6-10 11-15 16-20**

**Rated**

Technology

Friendliness / Courteous

Ease of Access

Quality of Copies

Price of Copy

Speed of Copy

Legible Files / Completeness

## WESTCHESTER COUNTY BOARD OF ELECTIONS

### II. JULY 31, 2003

The Westchester County Board of Elections is easily accessible by Metro-North Railroad. The Board of Elections is a few blocks from the White Plains stop and is housed in its own quaint building, which initially appeared to have all the modern amenities. Two employees at the front desk, whom we communicated with throughout the day, greeted us. We were informed that there was a workspace open to the public, right in front of the front desk, which contained a large table and chairs.

Our first inquiry was in regard to how we might gain access to campaign finance disclosure information submitted by judges and learned that a form must be filled out for each request pursuant to the Freedom of Information Law (FOIL). Once the form was complete, we were given a large binder that contained all the candidates who ran in 2002 and the results of the elections. Initially, we were told that we could only look at one file at a time and that no one would be able to copy files. A staff person explained that the office had a backlog of tasks to do, as a result of the July 15<sup>th</sup> filing date.

Files were given to us in a timely manner, however we were first told that that files could only be viewed one candidate, per party, at one time. (Later on in the day, we were able to view many files simultaneously.) We only had about ½ hour to view the files before another employee, whom we later found out to be the Republican coordinator, interrupted us. She told us that we would have to turn in the files because she was taking her lunch hour. After questioning her as to why this was the case, she informed us that the other coordinator, the Democrat, was also out to lunch and that no one would be “watching us.” We suggested that both of the front desk employees could watch us, as they seemingly were not working on anything, and she agreed to let us continue to view the files.

The Board of Elections presented the files we viewed in a particular order, in that the most recent filing statement was kept on top of the pile. We were informed that the files were kept that way, and that we were to keep them that way as well. We viewed three files, *Committee to Re-Elect Joan Cooney*, *Irene Ratner*, and *Committee to Elect Sam Walker*. The size of the files seemed to depend on whether or not a candidate ran in a primary or special election. For instance, Joan Cooney, who only ran in the general election, had a much smaller file than Irene Ratner’s, whose file contained two periodic reports, and both pre- and post- primary and general reports. In the process of reviewing these and other files, we noticed that some files contain all schedules, no matter if they are needed and filled out or not, while other files contained only the necessary schedules. Ms. Cooney’s files were handwritten and legible. Ms. Ratner, the County Court Republican, had some illegible files that were missing contributor’s addresses information on the expenditures. Also, three disclosure statements were stamped days later than they were due. For example, a January 15, 2003 filing deadline was stamped January 27, 2002, while a statement due December 11, 2002 was stamped December 13,

2002; we also noticed an 11 Day Pre-General Disclosure Statement was dated October 29, 2002 but stamped October 30, 2002. Irene Ratner's file also included a separate typed out sheet for Schedule A instead of using the board of elections issued schedule (this seems easier for candidates who have a long list of payments or expenditures). Mr. Walker, a County Court Democrat Candidate who ran against Ms. Ratner, did file his statements on time. His files appeared to have been electronically filed, but he neglected to fill out the statement inventory. Thus, a reader would not know what was included in that particular statement.

Through interviews with the front desk personnel and the Democrat coordinator, we learned that the Westchester Board of Elections does grant a grace period of 10 business days to candidates for filing. If a certain document is not received when it is due, the board actually contacts the candidate via a mailed notice. Candidates may hand deliver, mail or submit through email the required documents. All files are kept in hard copy. Scanners do exist but they are not currently used to load information onto the web for public access. The demand for files is great. The individuals who come in to view files range from the candidates themselves and employees of candidates, to retired persons and students. The volume of judicial filings seemed to depend upon the individual candidate's number of donations and the type of campaigns that they run.

## WESTCHESTER COUNTY BOARD OF ELECTIONS

### III. SUBJECTIVE RATINGS

#### **TECHNOLOGY:** 11-15 (for candidates)/ 6-10 (for public)

Westchester was the first Board of Elections that we visited that allowed candidates to file their financial disclosure statements on line. However, this is only voluntary- thus the public does not have easy access to this information. Since this service has been available since July 15, 2001, and after utilizing the website options currently available, we were only able to find a few candidates as of the date of this memo who have filed their disclosure statements online (Robert A. Neary, Annette L. Gurarino, Sam L. Walker). The Board itself has modern computers and scans in documents to keep a record of all the documents that they receive. There is no computer access for the public. The website (<http://www.westchestergov.com/boe/>) for the Board has good deal of general information for the public, along with the above mentioned nascent financial disclosure information.

#### **FRIENDLINESS / COURTEOUS:** 11-15

The Westchester Board of Elections was by far the most pleasant trip. There was a large table for reading and research with comfortable chairs and plenty of light, due to the large glass front doors. Pens and paper were available for the general public. The staff itself initially treated us with some hesitance and suspicion, but by the end of the day the staff seemed to come around and to talk to us more freely. For example, when we started to question the front desk employees, they immediately said they could not answer some of our questions and proceeding to call another employee who did. The employee came to the front right away and also provided quick responses for us. The only unusual moment was when a distinguished looking man came over to our table and asked how everything was going. We later surmised that he might have been the Commissioner.

#### **EASE OF ACCESS:** 16-20

The information at the board of elections is readily available to either candidates or to members of the public. The front desk has copies of the yearly election results, so it is possible to find the names of candidates and the information that requests are processed quickly.

#### **QUALITY OF COPIES:** 16-20

The copies we received were of high quality, easily readable, and contained all of the information that was in the originals.

#### **PRICE OF COPY:** 6-10

The copies were the standard \$0.25 a page. Though \$0.25 is the standard price for copies throughout all of the offices, this seems to be relatively costly. Copies at copy centers such as Kinko's can be done for a much cheaper price (usually around \$0.10 a page). There is no reason that such a high premium should be placed on public information that the general public should be able to obtain at a reasonable cost.

**SPEED OF COPY: 6-10/11-15**

We gave the Westchester Board of Election a mixed grade under the category of “speed of copy” due to the mixed signals that they conveyed to us. As previously mentioned, we were initially told that there would be no chance that we could get any copies done due to the backlog caused by the July 15<sup>th</sup> Periodic Filing Deadline. This was told to us after we reviewed the files and requested copies- we even discussed with them how to get the copies mailed to us. However, a couple of minutes later, we were told that they could make the copies for us, and received the copies in less than half an hour (three files with a total of around 160 pages).

**LEGIBLE FILES / COMPLETENESS: 11-15/6-10**

As discussed above, the different files varied in their completeness and legibility. Generally, the files were legible, with the expected problems when a file is handwritten. The files tended to be missing similar pieces of information: some were devoid of the address of a couple of donors or a blank inventory statement on the front of the disclosure statement. When filed, the files seemed to contain the proper information and the financial numbers added up.

**NASSAU COUNTY BOARD OF ELECTIONS**  
**AUGUST 5, 2003**

The Nassau County Board of Elections is easily accessible by the Long Island Railroad; the Board is within walking distance from the train station (the Mineola stop). The Board of Elections is in the middle of a large complex of cement buildings, which houses much of the bureaucracy of Nassau County. The interior of the Board of Elections is painted an unprepossessing brownish-yellow hue, and is furnished with metallic folding chairs and old wooden foldout tables. On the day we visited, there were power problems: only one of the front-desk staff's computers was functioning and the air conditioning was not working at all.

When we arrived at the Board of Elections, four desk receptionists greeted us. We immediately had to fill out a FOIL request, and then were told to wait; the form needed the appropriate signatures before we could view the files. We arrived at the Board of Elections at around 11:00 a.m. and waited until 11:30 before anyone spoke to us again. As we waited we listened to employees' personal accounts of what they had done the night before, what they were doing the coming weekend or for lunch; a variety of items were discussed, none of which pertained to their work. Because of the power outage we were informed that the "man" who is in charge of getting the files probably took an early lunch: the staff recommended that we should too. As 11:30 seemed a little early, we asked one of the receptionists some general questions about the office such as how busy the office typically is, and how many people are employed. The receptionist responded that approximately 100 employees work for their office, and that the workload varied in relation to when filings are due.

We left the office around 12, and arrived back at the Board of Elections an hour later. Again, we were told to wait. We inquired if someone else could retrieve the files and were told that the man who would retrieve the files was sitting right next to us in the waiting room. We sat and waited as this man talked to another, not about campaign finance information but family pictures, which they viewed together. After about an hour, he approached us and apologized, claiming that he was unaware that we were waiting for files, even though the desk attendants had told us they left our request on his desk hours before. Again, we waited as he got up to get us the files. He consulted with the Democratic coordinator, whom we had not seen before this point, and finally was able to show us some files. With the files in hand, we decided to review them quickly and decide what to copy: now that we had the Democrat and Republican coordinator in the area and did not want to lose their attention. We looked at the files of a number of judges who had run for both family and county court judges in 2002. We focused on the files of candidates Peck, Bates, and Sullivan, who ran against each other for two judicial vacancies on the county court bench.

As we received these files for review, the Board of Election sent out two people- one a Democrat and one a Republican- to “watch” us as we looked through the files. We were told that this was done to make sure that nothing was taken out of the files, and to ensure that no one made marks made on them: we were forbidden to use pens while we took notes examining the files and had to ask for pencils. This was very obtrusive and made us feel very uncomfortable. The job of the “observers” amounted to sitting in their chairs and staring at us as we reviewed the files.

The files were unremarkable. Their legibility varied with the quality of handwriting of the filer, though some of the judges had enclosed computer printouts for schedules. Occasionally, a schedule would be missing the address of a donor or two. The financial figures for the candidates seemed to add up. Of concern was a non-compliance letter in Judge Peck’s file. The letter stated that the committee for Judge Peck did not file a periodic January 15<sup>th</sup> disclosure statement, yet the file lacked a follow up letter, a filing, or any indication that the issue had been addressed. We asked the coordinator who reviewed the file about the follow up policy; he explained that a five-business day grace period was given to people who did not file, a response that did not answer the issue with this file.

We then returned the files and asked if we could have them copied. We were then told that we needed to fill out a new FOIL to get copies and that this too needed the appropriate signatures. So again we waited. Finally, at 3:30pm, after 4 and ½ hours of waiting, we were told that it would take the office 5 days to copy files as they “needed the appropriate signatures to use the specific copier downstairs.” We were informed that the five-day rule was Nassau’s policy, but could not help noticing a copier that was not being used and employees who were reading magazines or talking on the telephone. When we questioned this procedure, we were told that they were just following their policy and that it was summer; everyone was covering for someone else in this Board of Elections that employs over 100 people. We requested the copies and asked the Board to call us when they would be ready, at which time we would send them a check. As we left, the Republican and Democrat coordinator made faces at us and laughed. Obviously, this was no way to treat members of the public.

## NASSAU COUNTY BOARD OF ELECTIONS

### IV. SUBJECTIVE RATINGS

#### **TECHNOLOGY: 1-5**

The Nassau Board of Elections lacks technological services for the public and for candidates. First, it does not have a website for general information. All forms must be handwritten, and there is no apparatus for on-line filing or to obtain forms or documents online. Additionally, on the day we visited there was a power outage so the employees there did not have full computer access. More significantly, there is no computer access for the public use.

#### **FRIENDLINESS / COURTEOUS: 6-10/1-5**

As described above, the Nassau Board of Elections is not user friendly or particularly efficient. The staff people needed to retrieve files were unavailable, but when finally available, they were attentive and helpful. However, we felt that it was very unprofessional for the document coordinators to snicker at us as we departed.

#### **EASE OF ACCESS: 1-5**

Getting files and viewing them took quite a long time. Though staffed by approximately 100 employees, it seems that only a few individuals can authorize the release of public information to members of the public. When these people are not available, people are forced to sit around and wait for them to return. After the files are received, highly obtrusive observers then watched us. And finally, once the records are obtained, Nassau also makes the general public wait five business days before they will release any files.

#### **QUALITY OF COPIES: 1-5**

The physical conditions of the copies were acceptable and easily legible. The reason for this low grade is that the entire file requested was not included. For example, when first reviewing the file for Hon. Peck, we noticed that there was a letter that stated that she had not filed her January 15, 2003, periodic disclosure statement. We had requested the entire file be copied, but this letter was not included in the copy of the file that was sent to us.

#### **PRICE OF COPY: 6-10**

Copies are the standard \$0.25 a page. Although this is the same price for copies that the other board of elections offered, this seems to be a high price for public information.

#### **SPEED OF COPY: 1-5**

The Westchester Board of Election did not release information on the day we requested- we were told that they would get us copies within five business days. We gave them the names of the files that we wanted to have copied and our information. We received a call two days later, and were informed that our copies were ready and that we had to send them a check for the price of copies, postage paid and self-addressed envelopes for the return mail, and a letter re-requesting that the copies be sent to us. It took the Board of Elections over one week to get the files to us.

**LEGIBLE FILES / COMPLETENESS: 11-15/6-10**

As discussed above, the different files varied in their completeness and legibility. For the most part these files were legible, with the expected problems when a file is handwritten. Generally, the files tended to be missing similar pieces of information, such as the address of a couple of donors, and blank inventory statement charts. When filed, the files that we reviewed seemed to contain the proper information and the financial numbers seemed to add up.

V. MANHATTAN BOARD OF ELECTIONS  
JULY 15 AND AUGUST 14, 2003

Located at 32 Broadway in downtown Manhattan, the Board of Elections is easily accessible. Visitors do not have to sign in nor show identification to any building personnel when entering the lobby. However, once one arrives on the 7th floor, access to documents is more inhibited. Approaching the office, we were confronted by dark and dreary doors that were rather foreboding, and made the office look closed. Nonetheless, we entered, and found ourselves in the reception area.

The first time we visited this building the receptionists told us that it was a very bad day to visit as it was the deadline for the first periodic filing for all candidates running in this year's elections. Since we did not want our trip to be in vain nor leave empty handed we asked the receptionist a few questions. First, we asked, "If I were a candidate what would I do? What would I file or what documents would I need?" The receptionist immediately handed us a packet that contained the *New York State Board of Elections Handbook of Instructions for Campaign Financial Disclosure* and other document related material. Then we began questioning him more about how the public might gain access to campaign finance information. Though helpful, he kept insisting that July 15<sup>th</sup> was not a good day to visit them, and suggested that we come back in two weeks: "someone would be more than happy to give you a tour." After we conferred among ourselves and looked at the packet we had been given, we then asked the receptionist more questions such as, "How soon could the public look at such information on candidates who are filing campaign disclosure information today (July 15<sup>th</sup>)?" This seemed to be the breaking point for the receptionist, as he immediately called for his co-worker to bring us to where the campaign disclosure documents were kept.

In the backroom, approximately ten employees sat at their desks, reading the *New York Post*, browsing the internet, and talking on the telephone. When we asked for the most up to date disclosure information on Supreme Court judges, the office staff people were rather unfriendly. First, we were correctly informed that only Albany houses Supreme Court judge disclosure information. In response, we asked what judgeships they had on file. "Only New York City Civil Court judges," they responded. So we asked for the civil court judges of all 5 counties in the most recent 2003 election. "That's impossible," they claimed, we "absolutely could not have all of the information on the civil court judges." Requests can only be made by filling a request form, which includes the disclosure information of a named candidate. We had no names at our disposal, so we asked where we could find a list. We were told to look on the Web. But we did not have access to a computer, and there were none provided to the public by the BOE. Fortunately, one of the employees behind the desk (after getting approval from a man who appeared to be his superior) printed out a list of the relevant candidates for 2003 civil court judgeships, and we randomly selected judges. When a proper request was submitted, one of the BOE employees looked up our request on a computer and got a file number for the particular candidate. He then told one of his fellow employees, who sat

just five feet behind him, unengaged, to go to the file cabinets and retrieve the files requested. The man then got up and retrieved the document.

Since July 15 was the first filing day for 2003 primaries in September, and the elections in November, the individual candidate files were sparse. No disclosure forms or schedules were attached. Only basic registration forms, such as that which documents the name of the candidate's treasurer, were included. In order to review more complete files, we looked up a past candidate at random from the late 90's. This proved more useful, as all relevant schedules and cover pages and summaries for the various disclosure statements were included. Any missing filing documents were reflected in copied letters from the Board of Election to the candidate informing the candidate of their failure to file certain periodic filings. However, no "in lieu of" statements were included to further clear up the missing documents. The file also contained copies of the candidate's previous election campaign materials (fliers, handouts, etc.), which are not available to the public online.

Of note is the fact that we were clearly shunned by the Board of Election's legal counsel, who occupied the entire main table and chair area, when we tried to find a space to review the financial documents we had been given. We were told to go over to the public's table, a table no bigger than a few feet across. Counsel and his team were reluctant to give up any of their chairs despite the fact that most of them were empty, save a few papers.

The second visit we had to this office was certainly more productive. Our access to the files was much easier, as we knew the system and the Board of Election employees seemed less harried. We asked the front desk for financial disclosure information and, after signing in and putting on a nametag, were led to the same backroom where the files were kept.

During this second trip on a more "normal day" the file room had less employees staffing desk- this time there were six men- who seemed to be engaged in the same activities their co-workers were during our first trip. We had come armed with a list of candidates that we wanted to see, so we were directed to fill out a FOIL request with their names, position, and year of election. After looking up the correct number, which is kept on a computer database, the Board of Election employee was able to find and retrieve the appropriate file. This was done expediently; we had received five different files in approximately five minutes. As the legal team was not occupying the main table, we were able to use the large table available for public use.

The files that we requested were all randomly picked judges, one from each of the boroughs, who had won election in 2002. As most judges in New York County do not face appreciable opposition, we did not look at the financial filings of any existing oppositional candidates. We looked at the filings for Judges Debra Rose Samuels (Manhattan), Fernando Tapia (Bronx), Wavny Toussaint (Brooklyn), Timothy Dufficy (Queens), and Judith McMahon (Staten Island). As a general rule, all of these files were somewhat miskept, as they did not seem to be in any particular order. We noticed that

some seemed to be filed from most recent to least, while other files did not seem to have any order. The files tended to be filled with a lot of other documents, such as campaign literature, which also clutters the files. All files were handwritten and none of them contained any printed schedules. The most common error that the files shared was that they lacked statement inventories on the front of the disclosure statements, and donor addresses and check numbers. The file of Hon. Wavny Toussaint is of note, as his file was extremely large and convoluted. His full file was too large to copy, partially due to the large amounts of money that he raised, and partially due to the problems he had in filing. After reviewing his file it seemed quite apparent the Judge Toussaint and his committee's treasurer were having problems with the filing process. For example, his first filing for the July 15<sup>th</sup> periodic filing date was very long (over 100 pages), as each individual donor was listed on a separate page, rather than multiple donors per page, as is typically the format of the schedules. Later filings were not sent in time to the Board of Elections and non-compliance letters were sent out to the committee by the board (This portion of the file has been copied and is included).

We then spoke to the file clerk who told us that late filing is common among candidates. He told us that candidates typically get a one-week grace period, after which a phone call is placed to the committee of the offending candidate. If compliance is still not met following that phone call, the Board of Elections will then send out a letter warning the candidates. If the filing is still not received after this warning, then the name of the candidate is given to the Commissioner who will then proceed with legal action.

After reviewing the files, we requested copies that be made for our records. We had part of Hon. Toussaint's file copied (the part with all of the non-compliance letters and issues with his treasurer) along with the files of Hon. McMahon and Hon. Tapia, as theirs seemed to be quite typical. When we requested the copies, we were asked to fill out another FOIL. The file clerk who we spoke asked if we had any specifications for the copies of the files. We were able to point out to him the part of Hon. Toussaint's file that we wanted, and also able to point out a duplicate filing in Hon. McMahon's file that was not needed. The file clerk then made copies, which were given to us in less than half an hour.

## MANHATTAN BOARD OF ELECTIONS

### VI. SUBJECTIVE RATINGS

#### **TECHNOLOGY: 6-10**

The New York County Board of Elections does not have extensive technological services for either the public or for candidates. The website for the Board of Elections ([www.vote.nyc.ny.us/index.jsp](http://www.vote.nyc.ny.us/index.jsp)) has valuable general information for both candidates and the public: voter registration, election results and statistics, financial disclosure rules and forms, an election calendar. However, if more in-depth information and filings are needed, this process must be done in person at the Board of Elections. Furthermore, none of these forms are available in computer format for the candidates—thus, all forms have to be handwritten or typed. At the Board of Elections there are no computers available to the public, however, the employees themselves do have computers and all the files are listed on their computer. We were told that the New York County Board of Elections currently does not scan in the files they receive, and that the only copies of the files they have are the hard copies in their drawers.

#### **FRIENDLINESS / COURTEOUS: 11-15/6-10**

As described above, we received competent service from the New York County Board of Elections. Though there seemed to be more employees behind the desk than necessary, when we did speak to a file clerk our requests were handled expeditiously and professionally.

#### **EASE OF ACCESS: 16-20**

Getting files and viewing them were easy and done very quickly. The building is easy to get to and when we visited on a less harried day, we had no problem getting into the financial disclosure area. However, access is fair on the busiest days of the year. As previously stated, on our first trip we were discouraged from entering the building and asking for information, even though it was easily retrieved when we finally were allowed into the filing area.

#### **QUALITY OF COPIES: 16-20**

The physical conditions of the copies were acceptable and easily legible. We were asked to specify exactly what we wanted copied and received everything in the file that was asked for.

#### **PRICE OF COPY: 6-10**

Copies are the standard \$0.25 a page. Although this is the same price for copies as in other board of elections offices, this price seems to be very high for public information.

#### **SPEED OF COPY: 16-20**

The New York County Board of Elections did a great job in getting us our copies as quickly as possible. The same employee who gave us the file and got our specifications for the copy job was the one who took the file back and copied it. We were able to get

our copy request of 3 different files—a total of over 160 pages—in a little under half an hour.

**LEGIBLE FILES / COMPLETENESS: 6-10**

What distinguished New York County from the other counties that we visited was that many files were handwritten and lacked typed schedules. Though most of the files were legible, many of them were a little bit hard to read, as the handwriting on the files was not very neat. The files also seemed to lack any sense of order as many of the filings seemed to have been placed in the files haphazardly. Beyond the internal disorganization of some of the files, everything else seemed to be in order. The files appeared complete and contained the requisite information and schedules. The files were coherent and the numbers added up- it just took a minute to find the information.