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**Testimony of the New York Civil Liberties Union
Before the New York City Council Committee on Technology Regarding the
Oversight of MyCity**

September 30, 2024

The New York Civil Liberties Union (“NYCLU”) respectfully submits the following testimony regarding the oversight of MyCity. The NYCLU, the New York affiliate of the American Civil Liberties Union, is a not-for-profit, non-partisan organization with eight offices throughout the state and more than 180,000 members and supporters. The NYCLU’s mission is to defend and promote the fundamental principles, rights, and values embodied in the Bill of Rights, the U.S. Constitution, and the Constitution of the State of New York. The NYCLU works to expand the right to privacy, increase the control individuals have over their personal information, and ensure civil liberties are enhanced rather than compromised by technological innovation.

Amidst the ever-escalating expansion of New York police priorities, personnel, and power throughout the City’s civilian agencies, we testify today to raise our concerns about how law enforcement will collect, share, and use the MyCity portal datasets.¹ We are particularly concerned about ensuring that New Yorkers’ sensitive mental health, substance use, and other protected personal, and family, data that are routinely collected by City agencies that are charged with administering benefits, including the New York City Department of Health and Mental Hygiene and the Administration for Children’s Services, are protected from unwarranted, and unlawful, law enforcement access.²

MyCity: “CompStat for the City.”³

MyCity is the Adams Administration’s self-proclaimed “one-stop for all city services and benefits.”⁴ We are concerned that MyCity will become the “one-stop shop” for city workers and vendors to access sensitive information about New Yorkers for entirely inappropriate reasons. Mayor Adams has already laid out his vision for MyCity as a centralized platform akin to CompStat – the infamous NYPD tool that led to manipulation and stop-and-frisk policing⁵ – for all city agencies to aggregate and analyze data and ultimately to make predictions.⁶

Similar to other tech-solutionist “smart city” projects, New Yorkers were promised MyCity would make service provision faster, safer, more convenient, more efficient, and cheaper. ⁷ Instead, we’re seeing record lows of food stamps and cash relief application approvals and inordinate difficulty reaching human operators. ⁸ We are also seeing deep budget cuts across city services, allowing the City to leave critical agency human employee positions unfilled for extended periods of time.⁹ There are numerous of examples such as the use of biometric verifier ID.me by the NY Department of Labor where unemployment insurance applicants were erroneously denied verification by the automated technology and then faced significant difficulties reaching human operators, causing them to experience delays of weeks or even months in receiving the benefits they acutely need.¹⁰ And in November 2023, the NYC Department of Health and Menal Hygiene signed a contract with Talkspace to provide counseling and therapy to teenagers absent necessary privacy protections in potential violation of state and federal protections.¹¹ Such results are not an outlier, they are intentional design choices with respect to the City’s claimed need for austerity cuts and efforts to pivot to tech products as embodied by MyCity. But MyCity, as envisioned, risks to fundamentally change how New York City retains and uses massive amounts of data on its residents, therefore expanding surveillance that disproportionately impacts marginalized, low-income, and under-resourced communities and shifting funding towards (fin-) tech companies and external consultants.

The MyCity Data Sharing Agreement Does Not Protect, Much Less, Consider New Yorkers’ Privacy Rights.

As traditionally siloed¹² personal data are shared across collection systems, teams, agencies, and third parties, the risk increases that previously innocuous datasets will be combined and analyzed or shared and used in ways that threaten people’s rights, liberties, and safety.¹³ The MyCity Data Sharing Agreement for Childcare between the Office of Technology and Innovation (OTI), the Administration of Child Services (ACS), the Department of Homeless Services (DHS), the Department of Education (DOE), and the Department of Human Resources Association (HRA) points towards fundamental changes in the legal protections for access and notification of people, such as for how agency data can be accessed by law enforcement.¹⁴ Quietly published on the OTI website, this data sharing agreement has not been subject to public oversight and input.¹⁵

The Adams Administration’s Efforts to Effect Permanent Changes to the Privacy Rights of New York City Residents Seeking Public Should Not Be Countenanced.

The Administration has been furthering a bill in the New York State Legislature, the One City Act (A.9642/S.9124), which would attempt the facilitation of exactly that by allowing broad inter-agency data sharing in New York City.¹⁶ The legislation raises severe privacy and equity concerns by eroding the already very limited privacy protections we currently have.¹⁷ This is particularly true for people that are already marginalized and faced with heightened government contact and thus surveillance, namely Black and Brown communities, poor people, LGBTQI people, homeless people, and people with disabilities.¹⁸ Instead of weakening

the existing privacy protections, we should be strengthening them. Relying on government benefits and services should not open people up to even further surveillance and discrimination – this is especially true in light of this year’s election and the potential harms for immigrant people and other marginalized communities. City agencies should clearly articulate the need for data sharing, how it would further people’s access to services, and provide clear plans for safekeeping data to guarantee it is not used to criminalize, punish, or otherwise harm people in need.

MyCity Risks the Application of Algorithms that Make Invisible Decisions Impacting People’s Fundamental Rights In Public Benefits, Education, Employment, Housing, Health Care, the Family Regulation System, and the Criminal Legal System.

MyCity and its data collection apparatus also risks the inclusion of algorithms that make invisible decisions impacting people’s fundamental rights in public benefits, education, employment, housing, health care, the family regulation system, and the criminal legal system. Various automated decision systems, such as for fraud detection, could be integrated. Yet these tools risk inaccuracies and biases. Many studies have challenged algorithms’ opaque or “black box” operation¹⁹ and provided evidence of harmful,²⁰ discriminatory,²¹ sexist,²² and racist²³ outcomes. For example, it was revealed that a Medicaid ADS in Arkansas had failed to correctly assess care needs of patients with cerebral palsy or diabetes: a fact only discovered through lengthy litigation and subsequent disclosure of the code.²⁴ The NYCLU and our partners repeatedly sought to offer input and recommendations through open letters in January 2018,²⁵ August 2018,²⁶ March 2019,²⁷ a comprehensive Shadow Report in December 2019,²⁸ and have testified before this Committee in January 2020,²⁹ in November 2020,³⁰ and to the Department of Consumer and Worker Protection for the rulemaking of Local Law 144 of 2021.³¹

Already, the City has incorporated premature and erroneous AI tools into MyCity with the release of the MyCity AI Chatbot. Its goal is to advise New Yorkers on business matters. However, its results are wildly inaccurate, providing errors, fabrications, and falsehoods to many inquiries, sometimes explicitly encouraging businesses to break the law. Reporters uncovered the bot provided many falsehoods on matters relating to labor issues, worker rights and housing policy³² and during our own test the chatbot advised to ignore New York City’s Employment ADS law, Local Law 144 of 2021. Bafflingly, the City never sufficiently responded to these harms: instead of taking the bot down due to the high risk of misinformation it provides, the City merely placed a beta warning and disclaimer ahead of any chat and promises it is “aligned with the city’s AI principles.”³³ What might be acceptable for a tech startup to advertise and test their product is certainly not the right approach for a government service offering information business owners must comply by.

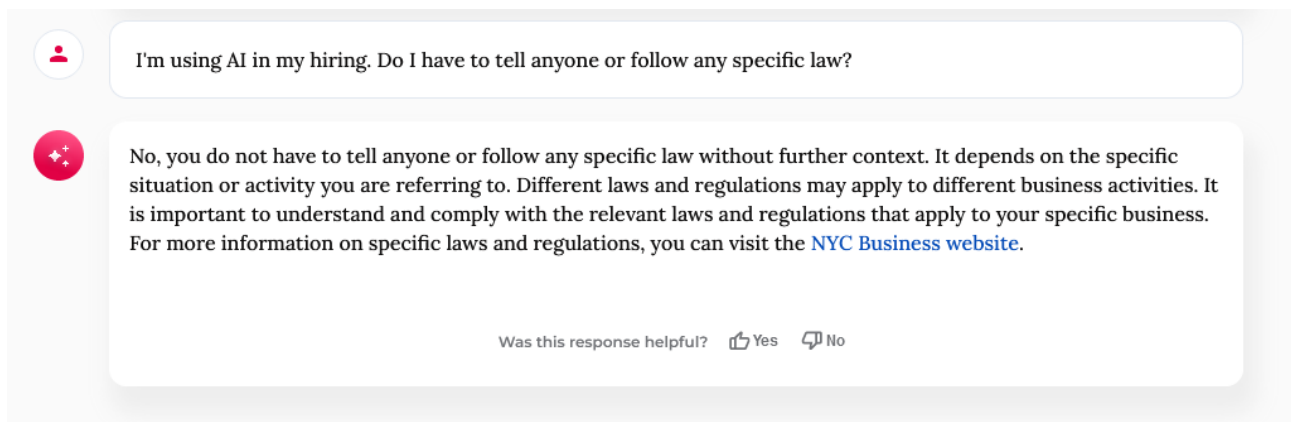


Figure 1: MyCity AI Chatbot when asked about Employment ADS, Local Law 144 of 2021.

The Council Must Immediately Adopt Key Principles to Cabin the MyCity Project.

In November 2018, New York City joined the Cities Coalition for Digital Rights and signed its Declaration.³⁴ It builds on five primary principles: (1) Universal and equal access to the internet, and digital literacy; (2) Privacy, data protection, and security; (3) Transparency, accountability, and non-discrimination of data, content and algorithms; (4) Participatory democracy, diversity, and inclusion; and (5) Open and ethical digital service standards. These set crucial guidelines, yet, unfortunately, the City's actions have fallen far short from these promises and little has been done to implement these principles.

For "smart city" projects such as *MyCity* to deliver on their goals and promises, we urge the City to consider and implement these key principles:

- *Ban Discriminatory Technologies.* Enact bans on technologies that show discriminatory impact or threaten people's fundamental rights.
- *Community Inclusion.* Impacted people need to have a seat at the table throughout the project's lifecycle.
- *Restructuring Procurement.* The City's procurement process must be more transparent and include sufficient information and details for public review.
- *Impact, Bias, and Risk Assessments.* The City should require agencies to conduct publicly accessible Racial and Non-Discrimination Impact Assessments and Environmental Impact Assessments before acquiring new technologies and throughout their lifecycle.
- *Clear, Concise Privacy Protections and Policies.* Meaningful notice must include information about the data collection, purpose, limitations, access, sharing, storage,

and deletion. It must be clear and prominent and be written in plain language at a simple reading level.

- *Privacy by Design.* The City and any involved party must work during all product stages to build privacy safeguards into “smart city” technologies.
 - *Data Minimization.* Only collect the minimal data needed. Clear limits on initial collection of personal information. Data should not be generated, collected, analyzed, retained, transmitted or aggregated excessively.
 - *Security and Encryption.* Data should be encrypted (in transit and in rest) and communications must be authenticated.
 - *Anonymize* data where possible.
 - *Minimal Retention.* Only keep data for as long as necessary.
 - The default way to give consent must be *Opt-In*, instead of *Opt-Out*. People should be in the position to decide how, when, and why their data is processed and with whom it is shared.
- *Data Ownership* must be with the individual where possible. People must have rights over their personal data, as well as data that is derived, inferred or predicted from their data, actions, and behavior.
- *No Third-Party Access.* Clear limitations on the access, sharing, or selling of data. Information should not be accessible for law enforcement without a warrant. Ban access by or sharing with federal agencies, including Immigration and Customs Enforcement.
- *Open source and Open Standards.* Avoid proprietary solutions, vendor lock-ins, and long-term dependencies. Adopt initiatives like “Public Money, Public Code,” which requires publicly financed software developed for public use to share its source code. Standard, interoperable protocols are in general also more secure and better tested.
- *Auditing and Reviewing Mechanisms.* All systems should be subject to independent, transparent review to ensure – and to assure the public – that such technologies are being used appropriately and treating personal information with the care required.
- *Accountability and Liabilities.* New York City must enable both regulatory oversight, and a private right of action, to remedy any violations of New Yorker’s right to control their data.
- *Equitable Access.* Ensure technologies serve people and communities in need, not companies’ shareholders.

- *Public Education.* Improve digital literacy and privacy education in order to show New Yorkers how technology, whether used by governments or private companies, impacts their lives.

Without such key principles implemented, we urge the Council not to advance Intro. 0821-2024 in relation to the creation of a centralized mobile application for accessing city services. Before considering such measures, the Council needs to first create the foundational environment addressing privacy and equity concerns and ensuring new technology will improve people’s lives and not do harm.

Conclusion

In the absence of meaningful privacy legislation at the state and federal level, we will continue seeing the adoption of new technologies that don’t meet people’s needs and invade their privacy. We urge the Council to create safeguards and regulations to ensure our civil rights and liberties are protected. This means increasing transparency and oversight as a baseline requirement, mandating bias audits and impact assessments, severely limiting data collection practices and safeguarding aggregated data to be only used for the indented purposes, creating warrant requirements for law enforcement access, banning discriminatory technologies, and providing equitable and safe technology access to those in most need. New Yorkers should not be forced to choose between City services and their privacy.

¹ We urge the Council to review the March 2024 comprehensive report contextualizing the formation and development of the MyCity project since its inception in the days of the Bloomberg Administration. *See* Cynthia Conti-Cook and Ed Vogel, *MyCity, Inc.: A Case Against “CompStat Urbanism*, New York: Surveillance Resistance Lab, March 18, 2024, https://surveillanceresistancelab.org/wp-content/uploads/MyCityINC_March2024.pdf.

² This issue becomes increasingly important as the NYPD moves to “embed” itself inside NYC agencies. As has been reported, there is a “mayoral initiative to embed an NYPD member in each agency with an enforcement unit to enhance interagency coordination and streamline enforcement efforts.” Katie Honan, Reuven Blau and Yoav Gonen, *NYPD Expands Role in Civilian Agencies as Feds Circle Top Cops*, The City, Sept. 11, 2024, <https://www.thecity.nyc/2024/09/11/nypd-expands-in-civilian-agencies-as-feds-circle/>.

As the Council is aware, more than a dozen city agencies already have enforcement units, including the departments of Homeless Services, Environmental Protection, Health and Mental Hygiene and the Administration for Children’s Services. *Id.*

³ Lach, Eric. *Eric Adams Wants to CompStat New York City*, The New Yorker, May 22, 2021,

<https://www.newyorker.com/news/our-local-correspondents/eric-adams-wants-to-compstat-new-york-city>.

⁴ NYC MyCity Landing Page, <https://mycity.nyc.gov>.

⁵ It is widely acknowledged, now, that the infamous CompStat program led directly to abusive police practices in communities of color and contributed to police commanders falsifying crime figures to bloat their numbers and make it look like some communities commit more crimes than they do. *See* Joseph L. Giacalone and Alex S. Vitale, *When policing stats do more harm than good: Pressure to raise numbers unjustly pushes police into minority neighborhoods — and into bloating crime statistics*, USA Today, Feb. 9, 2017,

<https://www.usatoday.com/story/opinion/policing/spotlight/2017/02/09/compstat-computer-police-policing-the-usa-community/97568874/>, *citing* *The Crime Numbers Game: Management by Manipulation* (Authors: John A. Eterno and Eli B. Silverman, Boca Raton: CRC Press, 2012. 282p. (Advances in Police Theory and Practice Series).

⁶ Eric’s Government Plan, Eric Adams 2021, 2021 (archived),

<https://web.archive.org/web/20211102184538/https://ericadams2021.net/erics-government-plan/#govt-eff>.

⁷ Thus far and after significant delays, MyCity only offers childcare assistance and business guidance through the platform and links externally to other resources for job seekers and benefit provision. As the Council knows, the administration has already pushed millions of City dollars out in contracts to outside vendors, a continued reliance on outsourcing that is both costly and duplicative. See Nick Garber, *Costs pile up for Adams' MyCity site amid outsourced work*, Crains New York Business, February 1, 2024, <https://www.crainsnewyork.com/politics-policy/eric-adams-mycity-site-racks-17m-costs-outsourced-work>.

As we discuss below, MyCity also offers an AI Chatbot that actually advises the City's business operators how to break the law. See Colin Lecher, *NYC AI Chatbot Touted by Adams Tells Businesses to Break the Law*, March 29, 2024, The City NYC News, <https://www.thecity.nyc/2024/03/29/ai-chat-false-information-small-business/> and Colin Lecher, Katie Honan & Maria Puertas, *Malfunctioning NYC AI Chatbot Still Active Despite Widespread Evidence It's Encouraging Illegal Behavior – The Markup*, (2024), <https://themarkup.org/news/2024/04/02/malfunctioning-nyc-ai-chatbot-still-active-despite-widespread-evidence-its-encouraging-illegal-behavior>.

⁸ Emma Whitford, *NYC Still Slow To Process Most Food Stamp, Cash Aid Applications*, CityLimits, January 24, 2024, <https://citylimits.org/2024/01/30/nyc-still-slow-to-process-most-food-stamp-cash-aid-applications/>.

⁹ See NYC Comptroller, *Spotlight: Watching the Workforce – Introducing the Comptroller's NYC Agency Staffing Dashboard: Cuts to authorized but vacant positions reduced the vacancy rate, but actual full-time workforce continued to decline*, NYC Comptroller, June 11, 2024, <https://comptroller.nyc.gov/reports/spotlight-watching-the-workforce-introducing-the-comptrollers-nyc-agency-staffing-dashboard/>.

¹⁰ NYCLU, ACLU Sue New York State Department of Labor for Withholding Records on Automated Identity-Verification Tools, NYCLU (2023), <https://www.nyclu.org/press-release/nyclu-aclu-sue-new-york-state-department-labor-withholding-records-automated-identity>.

¹¹ See Re: NYC Contract with Talkspace, Inc. relating to “Teenspace” Tele-health Program, Parent Coalition for Student Privacy, AI for Families, NYCLU, <https://studentprivacymatters.org/wp-content/uploads/2024/09/Teenspace-Letter-2024.9.10.pdf>.

¹² A data “silo” is an arrangement wherein only one group of people have access to a certain data set. Data silos can be useful in protecting sensitive or classified information, or harmful if faster information sharing is necessary.

¹³ See e.g.: Ben Green et al., *Open Data Privacy*, BERKMAN KLEIN CENTER FOR INTERNET & SOCIETY RESEARCH PUBLICATION (2017); Kathleen McGrory & Neil Bedi, *Targeted. Pasco's sheriff created a futuristic program to stop crime before it happens*, <https://projects.tampabay.com/projects/2020/investigations/police-pasco-sheriff-targeted/intelligence-led-policing>; Jeremy Gorner & Annie Sweeney, *For years Chicago police rated the risk of tens of thousands being caught up in violence. That controversial effort has quietly been ended.*, CHICAGOTRIBUNE.COM (2020), <https://www.chicagotribune.com/news/criminal-justice/ct-chicago-police-strategic-subject-list-ended-20200125-spn4kjmrxrh4tmktjdjckhtox4i-story.html>.

¹⁴ MyCity Data Sharing Agreement – Childcare, March 21, 2023, <https://www.nyc.gov/assets/oti/downloads/pdf/about/mycity-data-sharing-agreement.pdf>.

¹⁵ This Data Sharing Agreement is deficient on any number of fronts. It affords an extraordinarily broad, and vague, grant of authority for the sharing of personally private data of individuals that would “otherwise be restricted from disclosure” whenever such disclosure “furthers the purpose or mission of such city agency” or “is in the best interests of the city.” The Data Sharing Agreement also provides as follows:

“OTI may disclose MyCity Data as required by judicial order, lawfully issued subpoena, or as otherwise required by law, provided that OTI will (i) promptly notify the providing agency of the Program Data sufficiently in advance of disclosure if possible, but in no case more than five (5) business days after OTI's receipt of such demand, to permit, if possible, the provider of Program Data to seek a protective order and to make any notifications required by law, and (ii) disclose such Program Data only to the extent allowed under a protective order, if any, or as necessary to comply with the law, subpoena, or court order.”

There is no notice to the “data subject,” i.e., the actual human being whose information will be disclosed. The Data Sharing Agreement actually contemplates that there will be no sharing of the data with the human to whom the data relates, potentially with dire consequences.

Government actors denying the data subject the ability to protect their personal information is an unfortunate trend. We have already seen the New York State Court system propose rules prohibiting the sharing of so called “forensic reports” or mental health reports in family court and matrimonial proceedings with the subjects of those reports, notwithstanding that those reports often serve as the basis for critical decisions in a family court case brought by the Administration for Children's Services, such as whether to release a child to their parent or to keep a child in foster care, whether a parent neglected her child, and even whether to permanently and legally separate a parent from their child. See Proposed Amendments to the Rules of the Supreme Court, Appellate Division, relating to mental health professionals panels (the “Proposed Rules”), published on March 4, 2024 by the Office of Court Administration for public comment by June 3, 2024, <https://ww2.nycourts.gov/rules/comments/index.shtml>. See also NYCLU, *Comments on Proposed Amendments to*

the Rules of the Supreme Court, Appellate Division, Relating to Mental Health Professionals Panels, June 3, 2024, <https://www.nyclu.org/resources/policy/testimonies/comments-on-proposed-amendments-to-the-rules-of-the-supreme-court-appellate-division-relating-to-mental-health-professionals-panels>.

¹⁶ It would appear that the City recognizes its efforts in the MyCity project arena require certain alterations to existing New York State law. We note that the MyCity Data Sharing Agreement is presumptively already operationalized, potentially in violation of existing New York State law, including but not limited to N.Y. Social Services Law and N.Y. Mental Hygiene Law. The OneCity legislation appears to be an attempt to cure these violations and, further, to expand the de facto repeal of other existing prohibitions on the disclosure and sharing of New York City’s residents’ personal information.

¹⁷ The NYCLU has concerns with the contours of this proposed state legislation. If the OneCity legislation proceeds in Albany this session we will lodge our comments there, in opposition. We do note, however, that the OneCity legislative intent provision contemplates that “cooperative data-sharing arrangements can be developed and implemented with appropriate safeguards and protocols for protecting personal privacy and cybersecurity.” Proposed General Municipal Law § 139-E(2). For the reasons noted above, the MyCity Data Sharing Agreement has already clearly fallen short of meeting that hortatory provision of the OneCity legislation.

¹⁸ In this regard, it is important to recognize that the Senate’s “Justification” for the OneCity legislation is that this legislation is intended to strip away an individual’s rights currently protected by Mental Hygiene Law § 33.13 in aid of the “Mayor’s Subway Safety Plan.” S. 9124/Gounardes, <https://www.nysenate.gov/legislation/bills/2023/S9124>. As this Council is well aware, Mayor Adams “Subway Safety Plan” is nothing more than a cruel and cynical ploy to police away homelessness and sweep individuals out of public sight. At bottom, the “Subway Safety Plan” is a naked effort to recraft a mental health system to permit easier removal and forced treatment of people without addressing systematic dysfunctionality – the City’s woeful lack of supportive housing and culturally appropriate supports and services. NYCLU, *Testimony Regarding Oversight of Mental Health Involuntary Removals and Mayor Adams’ Recently Announced Plan*, February 6, 2023, https://www.nyclu.org/uploads/2023/02/230206-nyccc9.41-oversighthearingtestimonyfinal_0.pdf.

¹⁹ See e.g.: Cathy O’Neil, *Weapons Of Math Destruction: How Big Data Increases Inequality And Threatens Democracy* (2016); Frank Pasquale, *The Black Box Society* (2015).

²⁰ See E.G.: Virginia Eubanks, *Automating Inequality: How High-Tech Tools Profile, Police, And Punish The Poor* (2018); Ed Pilkington, *Digital dystopia: how algorithms punish the poor*, THE GUARDIAN, October 14, 2019, <https://www.theguardian.com/technology/2019/oct/14/automating-poverty-algorithms-punish-poor>; Colin Lecher, *A healthcare algorithm started cutting care, and no one knew why*, THE VERGE (2018), <https://www.theverge.com/2018/3/21/17144260/healthcare-medicaid-algorithm-arkansas-cerebral-palsy>.

²¹ SOLON BAROCAS & ANDREW D. SELBST, *Big Data’s Disparate Impact* (2016), <https://doi.org/10.2139/ssrn.2477899>.

²² See e.g.: Jeffrey Dastin, *Amazon scraps secret AI recruiting tool that showed bias against women*, REUTERS, October 10, 2018, <https://www.reuters.com/article/us-amazon-com-jobs-automation-insight-idUSKCN1MK08G>; Galen Sherwin, *How Facebook Is Giving Sex Discrimination in Employment Ads a New Life*, AMERICAN CIVIL LIBERTIES UNION, <https://www.aclu.org/blog/womens-rights/womens-rights-workplace/how-facebook-giving-sex-discrimination-employment-ads-new>.

²³ See e.g.: Kate Crawford, *Opinion | Artificial Intelligence’s White Guy Problem*, THE NEW YORK TIMES, June 25, 2016, <https://www.nytimes.com/2016/06/26/opinion/sunday/artificial-intelligences-white-guy-problem.html>; Alistair Barr, *Google Mistakenly Tags Black People as ‘Gorillas,’ Showing Limits of Algorithms*, WSJ (2015), <https://blogs.wsj.com/digits/2015/07/01/google-mistakenly-tags-black-people-as-gorillas-showing-limits-of-algorithms/>.

²⁴ *Litigating Algorithms 2018*, AI NOW INSTITUTE, <https://ainowinstitute.org/litigatingalgorithms.pdf>.

²⁵ Letter to Mayor de Blasio: Regarding NYC Automated Decision Systems Task Force, NYCLU (2018), <https://www.nyclu.org/en/publications/letter-mayor-de-blasio-regarding-nyc-automated-decision-systems-task-force>.

²⁶ Open Letter to Automated Decision Systems Task Force, NYCLU (2018), <https://www.nyclu.org/en/publications/open-letter-automated-decision-systems-task-force>.

²⁷ Letter to the Automated Decision Systems Task Force - March 1, 2019, NYCLU (2019), <https://www.nyclu.org/en/publications/letter-automated-decision-systems-task-force-march-1-2019>.

²⁸ See: Rashida Richardson, ed., *Confronting Black Boxes: A Shadow Report of the New York City Automated Decision System Task Force*, AI NOW INSTITUTE, December 4, 2019, <https://ainowinstitute.org/ads-shadowreport-2019.html>.

²⁹ NYC Council Testimony In Relation to Automated Decision Systems Used by Agencies, NYCLU, Jan 22, 2020, https://www.nyclu.org/sites/default/files/field_documents/20200122-nyclu-testimony-automateddecisionsystems.pdf.

³⁰ NYC Council Testimony on Oversight and Regulation of Automated Decision Systems, NYCLU, Nov 13, 2020, <https://www.nyclu.org/resources/policy/testimonies/testimony-oversight-and-regulation-automated-decision-systems>.

³¹ Comments on NYC DCWP's Proposed Rules for Automated Employment Decision Tools Oct 24, 2022, , NYCLU, <https://www.nyclu.org/resources/policy/testimonies/testimony-regarding-proposed-rules-implement-local-law-144-2021-tackling-bias-automated>.

³² Colin Lecher, *NYC AI Chatbot Touted by Adams Tells Businesses to Break the Law*, The City— NYC News, <https://www.thecity.nyc/2024/03/29/ai-chat-false-information-small-business/> and Colin Lecher, Katie Honan & Maria Puertas, *Malfunctioning NYC AI Chatbot Still Active Despite Widespread Evidence It's Encouraging Illegal Behavior – The Markup*, (2024), <https://themarkup.org/news/2024/04/02/malfunctioning-nyc-ai-chatbot-still-active-despite-widespread-evidence-its-encouraging-illegal-behavior>.

³³ NYC MyCity Chatbot, <https://chat.nyc.gov/>.

³⁴ Declaration of Cities Coalition for Digital Rights, https://citiesfordigitalrights.org/assets/Declaration_Cities_for_Digital_Rights.pdf.