



Mayor's Office of Criminal Justice

Elizabeth Glazer
Director
Mayor's Office of Criminal Justice

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By Electronic and United States Mail

February 4, 2015

Earl Ward, Esq.
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600 Fifth Avenue
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Dear Mr. Ward:

Thank you for your Board's corrective action plan that encapsulates our discussions regarding the steps necessary to address the issues identified in the Department of Investigation's report of January 29, 2015. This letter confirms and accepts the plan as set out below:

1. The two employees who arranged for The Bronx Defenders to be featured in the film, Kumar Rao and Ryan Napoli, have resigned from the organization.
2. The Executive Director of the organization, Robin Steinberg, will be suspended without pay for 60 days. To facilitate the transition of her duties, the suspension will begin on February 27, 2015. During the six-month period following her return, the Board will increase its oversight of Ms. Steinberg. Any unsatisfactory performance by Ms. Steinberg during this period will result in her resignation. The Board will provide monthly reports to my office summarizing the results of this increased oversight.
3. The Mayor's Office of Contract Services (MOCS), in conjunction with my office, will immediately undertake a Capacity Building and Oversight review. This review is an evaluation performed by MOCS of City contractors' organizational policies and practices to identify any weaknesses in governance, financial controls or management structure. At the close of that review, the organization will take any necessary remedial actions or policy changes that MOCS requires.

4. The Board will immediately retain Jason Lilien, the former Bureau Chief of the New York State Attorney General's Charities Bureau and the principal author of the Nonprofit Revitalization Act of 2013, which imposed new duties and obligations on the boards of non-profits. In coordination with my office and MOCS, Mr. Lilien will conduct a complete review of the organization and advise the Board on policy and governance reforms necessary to address specifically DOI's findings. Within 30 days, the board will designate a board subcommittee to review, evaluate, and oversee implementation of Mr. Lilien's recommendations. The Board will consult with my office and MOCS with respect to the results of that review and any remedial steps.

5. Within 30 days, the Bronx Defenders will begin the process of recruiting a General Counsel or Chief Compliance Officer to oversee the implementation of any changes required by MOCS or instituted as the result of Mr. Lilien's evaluation.

6. In conjunction with my Office, within 60 days the City's Corporation Counsel will identify a new training program for all employees of The Bronx Defenders to ensure that its attorneys are zealously representing the interests of their clients and observing their responsibilities as officers of the court. This training program will be put into place within 30 days of Ms. Steinberg's return.

Sincerely,



Elizabeth Glazer
Director
Mayor's Office of Criminal Justice

cc: Mitra Hormozi, Esq.
First Deputy Mayor Anthony Shorris
Corporation Counsel Zachary Carter