Business Integrity Commission

DECISION OF THE BUSINESS INTEGRITY COMMISSION TO DENY THE REGISTRATION APPLICATION OF CONEY ISLAND CONTAINER INC. TO OPERATE AS A TRADE WASTE BUSINESS

Introduction

Coney Island Container Inc. ("Coney Island" or the "Applicant") has applied to the New York City Business Integrity Commission (the "Commission") for renewal of its exemption from licensing requirements and a registration to operate a trade waste business pursuant to New York City Administrative Code ("Admin. Code") §16-505(a). Specifically, Coney Island seeks an exemption from the licensing requirements and a registration enabling it to operate a trade waste business "solely engaged in the removal of waste materials resulting from building demolition, construction, alteration or excavation" – a type of waste commonly known as construction and demolition debris, or "C & D." Id.

On May 7, 2012, the Commission served Coney Island with Notice of Grounds to Recommend Denial of the Registration Application ("Notice"). The Notice stated the grounds for denial of the application and notified Coney Island of its opportunity to submit a written response to the Notice and/or to provide other information it would have the Commission consider in connection with its exemption application. The Notice further stated that any factual assertions in Coney Island's response were to be made under oath. Response was due within ten (10) business days from the date of the notice. On May 18, 2012, the Commission received Coney Island's response which consisted of an affidavit signed by Jerry DeRosa ("DeRosa"), a principal, and one exhibit (collectively, "Response"). A copy of the Response was provided to members of the Commission for their review.[1]

Based upon the record, the Commission denies Coney Island's registration renewal application because Coney Island lacks good character, honesty and integrity. As set forth more fully below, on March 15, 2012, Coney Island's recent past principal, Anthony Castelle ("Castelle") was indicted for crimes including one court of Criminal Possession of a Weapon in the second degree and three counts of Criminal Possession of a Weapon in the third degree, all of which are racketeering activities in the New York Penal Law ("PL") §460.10(1). This indictment is the third time that Castelle has been prosecuted on weapons possession charges. Subsequently, on May 11, 2012, Castelle pleaded guilty to Criminal Possession of a Weapon in the third degree, a class "D" felony, and also a racketeering act. Castelle's repeated attempts to ignore and evade the law make Coney Island unfit for registration. Coney Island's registration

[1] On May 31, 2012, the Commission received a further submission from Coney Island, the Affidavit of Anthony Castelle. Such submission was served by mail and post-marked May 29, 2012, more than a week late than the date by which Coney Island's response was due. At no time did Castelle or Coney Island request additional time to provide its response, nor did they attempt to justify their late submission. Notwithstanding the fact that Castelle's Affidavit was untimely, it has been provided to the Commission for their review. Castelle's Affidavit makes largely the same arguments as DeRosa's affidavit; arguments which are rejected by the Commission as detailed below.

application should also be denied because it failed to disclose Castelle's arrests and convictions, as required by law, and further failed to disclose Castelle's lifetime of knowing associations with organized crime members.

Background and Statutory Framework

Every commercial business establishment in New York City must contract with a private carting company to remove and dispose of the waste it generates. Historically, the private carting industry in the City was operated as a cartel controlled by organized crime. As evidenced by numerous criminal prosecutions, the industry was plagued by pervasive racketeering, anticompetitive practices and other corruption. See e.g., United States v. International Brotherhood of Teamsters (Adelstein), 998 F.2d 120 (2d Cir. 1993); People v. Ass'n of Trade Waste Removers of Greater New York Inc. et al., Indictment No. 5614/95 (Sup. Ct. N.Y. Cty.); United States v. Mario Gigante et al., No. 96 Cr. 466 (S.D.N.Y.); People v. GNYTW, 701 N.Y.S.2d 12 (1st Dep't 1999). The construction and demolition debris removal sector of the City's carting industry has also been the subject of significant successful racketeering prosecutions. See United States v. Paccione, 949 F.2d 1183, 1186-88 (2d Cir. 1991), cert. denied, 505 U.S. 1220 (1992); United States v. Cafra, et al., No. 94 Cr. 380 (S.D.N.Y.); United States v. Barbieri, et al., No. 94 Cr. 518 (S.D.N.Y.); United States v. Caccio, et al., Nos. 94 Cr. 357,358, 359, 367.

The Commission is charged with, *inter alia*, combating the pervasive influence of organized crime and preventing its return to the City's private carting industry, including the construction and demolition debris removal industry. Instrumental to this core mission is the licensing scheme set forth in Local Law 42, which created the Commission and granted it the power and duty to license and regulate the trade waste removal industry in New York City. Admin. Code §16-505(a). It is this licensing scheme that continues to be the primary means of ensuring that an industry historically plagued with corruption remains free from organized crime and other criminality, and that commercial businesses that use private carters can be ensured of a fair, competitive market.

Pursuant to Local Law 42, a company "solely engaged in the removal of waste materials resulting from building demolition, construction, alteration or excavation," commonly known as construction and demolition debris, or "C & D" removal, must apply to the Commission for an exemption from the licensing requirement. Id. If, upon review and investigation of an exemption application, the Commission grants the applicant an exemption from the licensing requirement, it issues the applicant a Class 2 registration. Id. Before issuing such registration, the Commission must evaluate the "good character, honesty and integrity of the applicant." Id. at §16-508(b). The New York City Administrative Code provides an illustrative list of relevant factors for the Commission to consider in making a licensing or registration decision:

1. failure by such applicant to provide truthful information in connection with the application;

2. a pending indictment or criminal action against such applicant for a crime which under this subdivision would provide a basis for the refusal of such license, or a pending civil or administrative action to which such applicant is a party and which directly relates to the fitness to conduct the business or perform the work for which the license is sought, in which cases the commission may defer consideration of an application until a decision has been reached by the court or administrative tribunal before which such action is pending;
3. conviction of such applicant for a crime which, considering the factors set forth in section seven hundred fifty-three of the correction law, would provide a basis under such law for the refusal of such license;
4. a finding of liability in a civil or administrative action that bears a direct relationship to the fitness of the applicant to conduct the business for which the license is sought;
5. commission of a racketeering activity or knowing association with a person who has been convicted of a racketeering activity, including but not limited to the offenses listed in subdivision one of section nineteen hundred sixty-one of the Racketeer Influenced and Corrupt Organizations statute (18 U.S.C. §1961 et seq.) or of an offense listed in subdivision one of section 460.10 of the penal law, as such statutes may be amended from time to time, or the equivalent offense under the laws of any other jurisdiction;
6. association with any member or associate of an organized crime group as identified by a federal, state or city law enforcement or investigative agency when the applicant knew or should have known of the organized crime associations of such person;
7. having been a principal in a predecessor trade waste business as such term is defined in subdivision a of section 16-508 of this chapter where the commission would be authorized to deny a license to such predecessor business pursuant to this subdivision;
8. current membership in a trade association where such membership would be prohibited to a licensee pursuant to subdivision j of section 16-520 of this chapter unless the commission has determined, pursuant to such subdivision, that such association does not operate in a manner inconsistent with the purposes of this chapter;
9. the holding of a position in a trade association where membership or the holding of such position would be prohibited to a licensee pursuant to subdivision j of section 16-520 of this chapter;

10. failure to pay any tax, fine, penalty, or fee related to the applicant's business for which liability has been admitted by the person liable therefor, or for which judgment has been entered by a court or administrative tribunal of competent jurisdiction.

Id. at §509(a)(i)-(x). Additionally, the Commission may refuse to issue a license or registration to any applicant who has "knowingly failed to provide information or documentation required by the Commission...or who has otherwise failed to demonstrate eligibility for a license. Id. at §509(b). The Commission may refuse to issue a license or registration to an applicant when such applicant was previously issued a license which was revoked or not renewed, or where the applicant "has been determined to have committed any of the acts which would be a basis for the suspension or revocation of a license." Id. at §509(c). Finally, the Commission may refuse to issue a license or registration to any applicant where the applicant or its principals have previously had their license or registration revoked. Id. at §509(d).

An applicant for a private carting license (including construction and demolition) has no entitlement to and no property interest in a license or registration and the Commission is vested with broad discretion to grant or deny a license or registration application. Sanitation & Recycling Industry, Inc., 107 F.3d at 995; see also Daxor Corp. v. New York Dep't of Health, 90 N.Y.2d 89, 98-100, 681 N.E.2d 356, 659 N.Y.S.2d 189 (1997). Admin. Code § 16-116.

Statement of Facts

Coney Island applied to the Commission for a Class II registration for the removal of construction and demolition debris ("Registration"). Its reported principals were Castelle and DeRosa, who both held the position of Director / Co-president and owned equal shares. On September 1, 2005, the Commission granted Coney Island's application. However, Coney Island's Registration included a specific condition that it not have any business dealings with Castelle's brothers, Eugene Castelle and John Castellucci. Such association was prohibited because Eugene "Boobsie" Castelle and John Castellucci are both made members of the Lucchese organized crime family.[2] Coney Island's Registration was valid for two years, and thereafter, Coney Island timely filed applications for renewal.

Coney Island's initial application disclosed Castelle's 1994 conviction for a class "A" misdemeanor level weapons possession offense, for which he was sentenced to serve 90 days in jail. See Coney Island's Application for Exemption from Licensing Requirement for Removal of Construction and Demolition Debris ("Application") at 5. As a result of this conviction, Castelle's right to possess firearms was thereafter restricted. See PL §§265.00 – 265.03.

[2] Eugene and John were co-defendants in a federal racketeering case against the so-called "Bensonhurst Crew" of the Lucchese organized crime family, and they were convicted for committing various crimes under the Racketeer Influenced and Corrupt Organizations Act ("RICO") in violation of 18 USC §§1962(c) and 1963. They were sentenced to serve 88 months and 41 months in prison, respectively. *See U.S. v. Tangorra et al*, 00-cr-1167 (EDNY) (ARR).

However, in November 2006, (after the Commission granted Coney Island's Application) Castelle was arrested again on a weapons possession charge, and pleaded guilty to a violation. According to Commission rules, arrests of principals must be disclosed within 10 days of occurrence. Title 17 Rules of the City of New York ("RCNY") § 2-05(a)(1). Moreover, as part of its renewal application, the Commission requires registrants to disclose all arrests and convictions. See Commission renewal applications. Coney Island failed to disclose Castelle's 2006 arrest and subsequent plea in any of its renewal applications.

In June 2011, Castelle was arrested on gambling charges, and pleaded guilty to Disorderly Conduct. See Castelle Criminal History at 4. Coney Island failed to timely disclose this arrest and plea to the Commission, as required.

In November 2011, only five months after his gambling arrest, and approximately three months after Coney Island's most recent renewal application, Castelle was again arrested on weapons charges after a search warrant executed on Castelle's property discovered an unlicensed loaded handgun, two unregistered shotguns and two unregistered rifles. On May 11, 2012, Castelle pleaded guilty to a class "D" felony level weapons charge stemming from this arrest. Class "D" felony weapons possession is a racketeering act.[3]

In addition to requiring the disclosure of criminal history information, the renewal applications submitted by Coney Island also required them to state whether any of their principals or employees have "knowingly associated in any manner with any member or associate of organized crime." See First Renewal Application at 4; Second Renewal Application at 5; Third Renewal Application at 5. Coney Island responded negatively to this question in 2007, 2009, and 2011, when it filed for renewal of its Registration, and denied any such associations. Id.

While the Commission was aware that Castelle's brothers Eugene and John were members of the Lucchese organized crime family, Coney Island failed to disclose that its principal, Castelle, had knowingly associated in varying degrees for virtually his entire life with close to 3 dozen members of organized crime. That list includes the current boss of the Lucchese organized crime family, Steven Crea, and former Colombo organized crime family administration member Joel Cacace, who is currently awaiting trial in Brooklyn federal court on murder conspiracy charges in connection with the death of New York City police officer Ralph Dols, among other charges. The Commission became aware of such associations only after Castelle was called to give testimony before the Independent Review Board ("IRB") of the International Brotherhood of Teamsters ("IBT" or 'Teamsters") on March 11, 2011.[4] At his

[3] Coney Island also failed to disclose this arrest to the Commission. However, because Commission investigators assisted in the execution of the warrant leading to this arrest, the Commission was able to monitor what happened with the charges.

[4] The IRB is the internal investigative body of the Teamsters that was created pursuant to a settlement of civil racketeering charges brought against the Teamsters by the U.S. Justice Department in 1988. U.S. v. International Brotherhood of Teamsters, 88-civ-4486 (SDNY). The IRB is charged with investigating organized crime and other forms of corruption and any behavior by its members that tends to bring reproach upon the union, including knowingly associating with members and associates of organized crime. See, e.g., U.S. v. IBT, 808 F. Supp. 279, 283

deposition, Castelle admitted knowing or having met dozens of organized crime figures, many of whom he claimed to know "from the neighborhood" (upon information and belief, around Avenue U in Gravesend). See IRB Tr. at 34. Castelle's testimony self-servingly sought to minimize his interactions with them, but the sheer number with whom he was familiar was noteworthy.[5] Castelle testified, for example, that he was introduced to then Lucchese caporegime Steve Crea while visiting his brothers Eugene and John who were both incarcerated at Federal Correctional Institution, Ray Brook.[6] IRB Tr. at 27 and 68. On another similar occasion he met former Lucchese caporegime Joseph Tangorra. Id. at 28. More recently, he met Tangorra's co-defendant Scott Gervasi, another friend of his brothers, in late 2010. Id. at 31-33. He also admitted knowing Colombo Caporegime Luca DiMatteo[7] "from the neighborhood." IRB Tr. at 59-62 ("I grew up in their house as a kid" and I "talk to him every day") and Benjamin Castellazzo.[8] Castelle initiated correspondence with imprisoned Colombo caporegime Joel Cacace, after talking with Cacace's son Steven. IRB Tr. at 55-57.[9] All in all, Castelle admitted to having met or been associated with about three dozen organized crime figures, many of them persons of great notoriety.[10]

(S.D.N.Y. 1992), aff'd, 998 F.2d 120, 126 (2d Cir. 1993) ("Adelstein"). As an employee of the New York City Department of Sanitation, Castelle is a member of Teamsters Local 831 which represents public sector sanitation workers.

[5] With few exceptions, Castelle rarely claimed to have a conversation with any of the people in question that went much beyond "hello" and "goodbye." IRB Tr. at 27-74.

[6] Crea was convicted and sentenced in 2004 to 34 months in prison for construction industry related extortion. U.S. v. Crea, et al, 02-cr-844 (SDNY)(KMW). In connection with this case, he was identified by the United States Attorney as the underboss of the Lucchese organized crime family. See United State Attorney Press Release, U.S. Charges an Attorney, the Luchese Underboss and Several Members and Associates of Organized Crime, February 5, 2002. Crea is reputed to be the current boss of the Lucchese organized crime family. See Jerry Capeci, Gang Land News, Luchese Tape Stevie Wonder as New Boss; (That's Stevie From Creaville, Not Motown, February 23, 2012.

[7] For DiMatteo's organized crime status, see U.S. v. Cacace, 01-cr-0700 (EDNY) (SJ).

[8] For Castellazzo's organized crime status and most recent criminal charges, see U.S. v. Russo, 11-cr-30 (EDNY) (KAM).

[9] For Cacace's organized crime status and pending murder and racketeering charges, see U.S. v. Curanovic, 08-cr-240 (EDNY)(BMC).

[10] In his response, DeRosa claims that the Commission "scoffs at" the idea that Castelle is acquainted with people "from the neighborhood" many of whom happen to have ties to organized crime and mocks the Commission's supposed refusal to understand that this is plausible. *DeRosa Affidavit* at p.3, ¶21-22. DeRosa's ridicule is misplaced. The Commission does not doubt Castelle's testimony about who he knows "from my neighborhood" (the locution is Castelle's, *see, e.g.*, pp. 30, 34 and elsewhere), and that many of those he knows from his neighborhood have connections to organized crime. The Commission is only skeptical that Castelle would, as he repeatedly testified, have little or no conversation with most of these friends and acquaintances as he meets them from time to time beyond "hello" and "goodbye." According to Castelle's testimony, a typical exchange between Castelle and someone he has known for over a decade would go like this: "I seen him, and I said 'hello Scott,' he said hello to me, and that was what happened." *IRB Testimony* at 32 (Scott Gervasi). For other examples, see 35 (Alphonse D'Ambrosia) 45-46 (Frank Assisi), 54 (Joseph Amato), 58 (Benjamin Castellazzo), 60 (Luca DiMatteo (the uncle)), 62 (Robert D'Onofrio), 63-64 (Frank Iannaci), 65 (Theodore Persico), 67 (John Baudanza), 69-70 (Joseph Datello), 70-71 (Angelo DeFendis). The Commission's staff characterized Castelle's testimony in this regard as "self-serving" and DeRosa's reply gives the Commission no basis for altering that assessment.

Basis for Denial

A. Coney Island's Principal, Anthony Castelle was Indicted and Subsequently Convicted of a Crime that Constitutes a Racketeering Activity.

In determining whether an applicant lacks good character, honesty and integrity, the Commission is explicitly authorized to consider a "pending indictment or criminal action against such applicant or person for a crime which under this subdivision would provide a basis for the refusal of such [registration]." Admin. Code §16-509(ii). Further, the Commission may also consider a conviction for a crime which would provide a basis under §753 of the New York State Corrections Law ("Corr. L.") for the refusal of a registration. Id. at 16-509(iii). As set forth above, Castelle has now been arrested for a third time for weapons possessions charges. He has been indicted and convicted after pleading guilty. These felony level crimes are "racketeering offenses" according to Admin. Code § 16-509(a)(v), as they are offenses listed in the New York State's Enterprise Corruption Statute, PL §460.10(1). Therefore, being indicted (and subsequently convicted) for committing these crimes provides independent basis for denial of Coney Island's registration. See Admin. Code §16-509(a)(v). Moreover, analysis of the crimes charge in the indictment, and the crime to which Castelle pleaded guilty, in light of the factors set forth in Corr. L. §753(1), pursuant to Admin. Code §§16-509(a)(ii) and (iii), provides additional support for denial of Coney Island's registration. Those factors are:

> (a) The public policy of this state, as expressed in this act, to encourage the licensure and employment of persons previously convicted of one or more criminal offenses.
>
> (b) The specific duties and responsibilities necessarily related to the license or employment sought or held by the person.
>
> (c) The bearing, if any, the criminal offense or offenses for which the person was previously convicted will have on his fitness or ability to perform one or more such duties or responsibilities.
>
> (d) The time which has elapsed since the occurrence of the criminal offense or offenses.
>
> (e) The age of the person at the time of occurrence of the criminal offense or offenses.
>
> (f) The seriousness of the offense or offenses.
>
> (g) Any information produced by the person, or produced on his behalf, in regard to his rehabilitation and good conduct.

> (h) The legitimate interest of the public agency or private employer in protecting property, and the safety and welfare of specific individuals or the general public.

See Corr. L. § 753(1). Here, the public policy of the State to encourage the licensure is not outweighed by the Commission's legitimate interest in pursuing its mission under Local Law 42 and protecting "the safety and welfare" of the general public. See id. at (a) and (h). At the time of his November 2011 weapons possession arrest, Castelle was 42 years old and clearly old enough to understand and appreciate the gun possession laws and the restrictions imposed upon him due to his previous conviction. In fact, Castelle received a reminder of those restrictions when he was arrested in 2006 for weapons possession charges. Castelle chose to break the laws that restricted his ability to possess firearms, even after having been arrested for this same conduct twice previously. Castelle's recidivism on this issue goes beyond a casual disregard of the law and demonstrates actual contempt for the kind of legal restraints others take for granted in the interests of public safety and good order.[11] Taken together, Castelle's criminal history, comprised of numerous serious offenses as recently as 2011, makes clear that he should not be permitted to act as a principal of a company involved in an industry historically plagued by criminality.

To this ground for denial, the applicant has a simple response: Anthony Castelle sold his interest in the company recently and neither Jerry DeRosa nor the business itself have been charged criminally. While a step in the right direction, this attempted divestiture comes very late in the day and follows a prolonged period of inaction by DeRosa. Moreover, the vagueness and inconsistencies of the divestiture do not give the Commission confidence that it has a full description and understanding of the deal that has been reached between the parties.[12] In fact, the divestiture's timing, on the eve of Castelle's guilty plea to felony level weapons charges, and the fact that Castelle's shares were purportedly purchased for $1.00, is suspicious and does not give the Commission comfort that he will indeed cease being a principal in the company.

More fundamentally, the applicant's response mistakes the licensing and registration process as one pertaining to individuals rather than businesses. The Commission is not required to attribute individual wrongdoing to each principal or key employee involved. The Commission

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[11] It should be noted that this is not Castelle's only arrest. Castelle was arrested in 1994 and 2006 on weapons charges (only one of which was ever disclosed to the Commission), and in 2011 on gambling charges (which was not timely disclosed to the Commission), in addition to his most recent November 2011 arrest on weapons charges.

[12] For example, as the Applicant admits, the Stock Sale Agreement refers to a note to be taken by Castelle which it now says does not exist, despite the nominal sale price. DeRosa Aff. at ¶¶13-15. Moreover, while DeRosa avers that "while Castelle did not receive a large sum of money for his interest, he greatly benefitted from the sale because the Company released him from any and all financial liabilities that he may have incurred" (*id.* at ¶12), the forgiveness of Castelle's debts was not provided for in the Unanimous Consent and Resolution of the Shareholders and Directors of Coney Island Container, Inc., or Stock Sale Agreement which specifically states, "this agreement contains the entire understanding of the parties and may not be amended, changed or modified unless in writing and signed by the parties."

has before it an application from a business, one of whose principals has repeatedly been arrested, and now convicted, on serious weapons charges and another principal who is determined not to inquire into such things (see DeRosa Aff. at ¶32). That is enough of a record to find on this ground alone that this applicant lacks good character, honesty, and integrity.

B. Coney Island Failed to Disclose Castelle's Numerous Arrests and Convictions.

The success of the Commission's regulatory regime depends on the honesty of this industry's participants to timely disclose that which the law requires them to disclose, especially arrests and convictions of principals. See 17 RCNY §2-05(1)(a). Despite Castelle's repeated arrests, both Castelle and co-owner, DeRosa, falsely certified the truth of the assertions made in Coney Island's renewal applications in 2007, 2009 and 2011. See Commission Registration Renewal Applications. Specifically, Coney Island failed to disclose that Castelle was arrested in November 2006 on a weapons possession charge, and that he ultimately pleaded guilty to a violation. Additionally, Coney Island failed to timely disclose that in June 2011, Castelle was arrested on gambling charges, and pleaded guilty to disorderly conduct on the gambling charges. Finally, Coney Island failed to timely disclose Castelle's November 2011 weapons arrest.

The applicant responds by submitting an affidavit from the remaining principal denying any obligation to inquire about the criminal acts or organized crime associations of his business partner (DeRosa Aff. at ¶¶31-32), and reasserting the truth of his prior factually false certifications (*id.* at ¶36). Again, this response mistakes the registration application process as one that acts on individuals rather than applicant businesses, and overlooks that the Administrative Code's definition of "Applicant" makes each principal jointly liable for the company's action, and the actions of their partners. §16-501(a). Derosa's personal claim of ignorance coupled with the supposed lack of any duty on his part to inquire does not insulate the applicant (or himself) from a finding that it and its principals failed to properly disclose Castelle's arrests and therefore lack good character, honesty, and integrity.

C. Coney Island Failed to Disclose Castelle's Lifetime Association with Organized Crime Figures.

As set forth above, Castelle admits to associating with close to 3 dozen members of organized crime. Castelle and DeRosa were required to disclose all such associations but disclosed none, other than Castelle's brothers (who are made members of the Lucchese organized crime family).

The applicant's response on the issue of association with organized crime figures is identical to its response on its principal's criminal record and failure to disclose the same, and it

is as unavailing and unpersuasive here as it was there.[13] Accordingly, on this ground too the Commission finds the applicant lacks good character, honesty and integrity.

Conclusion

The Commission is vested with broad discretion to issue a license or refuse to grant an exemption from the license requirement and issue a registration in lieu of a license, to any applicant who it determines to be lacking in good character, honesty and integrity. The record as detailed above demonstrates that the Applicant falls short of that standard. Accordingly, based on the above independently sufficient reasons, the Commission denies Coney Island's exemption application and registration.

This exemption/registration denial is effective immediately. Coney Island Container Inc. may not operate as a trade waste business in the City of New York.

Dated: June 5, 2012

THE BUSINESS INTEGRITY COMMISSION

Shari C. Hyman
Commissioner and Chair

John Doherty, Commissioner
Department of Sanitation

Janet Lim, Assistant General Counsel (designee)
Department of Consumer Affairs

[13] *And see supra.* p. 6, fn. 10.

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