**WRITTEN TESTIMONY BY THE SEX AND LAW COMMITTEE,
CIVIL RIGHTS COMMITTEE, AND
LESBIAN, GAY, BISEXUAL, TRANSGENDER AND QUEER RIGHTS COMMITTEE**

**EXECUTIVE BUDGET HEARINGS
NEW YORK CITY COUNCIL COMMITTEE ON FINANCE**

RESTORATION OF CITY FUNDING AND STAFF TO THE NEW YORK CITY COMMISSION ON HUMAN RIGHTS (CCHR)

JUNE 10, 2026

The Civil Rights, LGBTQ Rights, and Sex and Law Committees of the New York City Bar Association ("the City Bar") strongly support restoration of City funding and staff to the New York City Commission on Human Rights (CCHR), a cornerstone in our city's commitment to civil rights.

We submit this testimony to call on the City Council to fully fund CCHR to ensure that it is able to fulfill its crucial mission to protect New York City workers from discrimination, especially the most vulnerable.

The CCHR has suffered from disinvestment for years, rendering it unable to meet the needs of New Yorkers. CCHR has minimal staff and budget but plays an outsized role in maintaining the rule of law. As vital and frontline defenders of essential civil rights, CCHR provides indispensable and otherwise unavailable services to the people of New York. CCHR requires increased funding which is necessary for vigorous enforcement of essential civil rights on behalf of all New Yorkers.

We urge the City to restore the agency's effectiveness by protecting its staff from further budget cuts, exempting it from headcount caps, ensuring its staffing levels are commensurate with its critical missions, and bridging the disinvestment gap the agency has faced over the last several years.

We urge the City Council to increase the CCHR'S Fiscal Year 2026 budget by $10 million, so that it is funded at $25 million in Fiscal Year 2027. This small investment in the agency would have an oversized impact on the lives of New Yorkers.

About the Association
The mission of the New York City Bar Association, which was founded in 1870 and has over 20,000 members, is to equip and mobilize a diverse legal profession to practice with excellence, promote reform of the law, and uphold the rule of law and access to justice in support of a fair society and the public interest in our community, our nation, and throughout the world.

Funding at this level will allow the Commission to address four urgent priorities.

1. ***Hiring New Staff & Expanding Mediation to Address Backlogged Cases.*** Without adequate funding or staffing, the CCHR's backlog of cases has grown significantly. Many of our members have experienced this first-hand, with cases they have filed taking years to get any response at all from CCHR. Restoring staffing levels and a robust mediation program is critical so that the CCHR can aggressively tackle its backlog—because justice delayed is justice denied.

2. ***Early Intervention.*** With adequate funding, the CCHR could expand its early intervention programs, and resolve cases early – keeping people in their jobs, allowing them to pay their rent and support their families.

3. ***Deputy Commissioner of Adjudications***. With adequate funding, CCHR could appoint a Deputy Commissioner of Adjudications, so that OATH decisions can be issued promptly. The CCHR refers hearings to OATH which then issues a report and recommendation to the Office of the CCHR Chair, who then has to issue a decision and order. Under the prior administration, OATH decisions have languished for months and years at CCHR while awaiting decisions, delaying monetary and injunctive relief for discrimination victims. Again, justice delayed is justice denied.

4. ***Affirmative Litigation.*** With adequate funding, the CCHR could establish an affirmative litigation team, to ensure that patterns identified by early intervention efforts, public reporting, and case investigations are pursued by the CCHR.

The New York City Human Rights Law ("NYCHRL"), administered by CCHR, is one of the most comprehensive civil rights laws in the country and applies to a long list of protected classes beyond those recognized by the federal and New York State governments.[1] We commend City Council for its expansive view of civil and human rights, amending the NYCHRL over 40 times since 2013 to add additional protections for New Yorkers.[2]

The consequences of the chronic underfunding of CCHR, which prevents New Yorkers from receiving justice when faced with discrimination, are particularly acute right now. The recent announcement by the federal Equal Employment Opportunity Commission (EEOC) that it intends to stop or limit the acceptance, processing, and investigation of charges brought by those who suffer from workplace gender identity discrimination means that New Yorkers who experience workplace discrimination based on gender identity will look to New York State courts and the New

[1] New York City Comm'n on Human Rights, *The New York City Human Rights Law*, NYC.GOV, https://www.nyc.gov/site/cchr/law/the-law.page. (All websites last accessed June 8, 2026)

[2] New York City Comm'n on Human Rights, *Amendments to the NYC Human Rights Law*, NYC.GOV, https://www.nyc.gov/site/cchr/law/amendments.page.

York City Commission on Human Rights for protection of their rights. In addition, there are press reports that EEOC has instructed its staff to halt processing of all sexual orientation claims. [3]

This, of course, is occurring in the larger context of the Trump Administration's stance on discrimination in general, which led former EEOC Commissioner Jocelyn Samuels to comment, "I am deeply worried that the EEOC will no longer be an agency that is committed to protecting and vindicating the rights of vulnerable workers, and will instead be a barrier to their ability to be protected from discrimination."[4]

I. BACKGROUND

The New York City Human Rights Law (NYCHRL has prohibited discrimination based on gender identity since 2002, with the passage of the Transgender Rights Bill. It ensured legal protection for people whose "gender and self-image do not fully accord with the legal sex assigned to them at birth," with the intent to make explicit that the law prohibits discrimination against people based on gender identity. Recognizing the profoundly debilitating impact of gender-based discrimination on transgender, non-binary, and other gender non-conforming people, the amendment makes clear that "gender-based discrimination—including, but not limited to, discrimination based on a person's actual or perceived sex, and discrimination based on a person's gender identity, self-image, appearance, behavior, or expression—constitutes a violation of the City's Human Rights Law." In 2018, the City Council amended the definition of "gender" in the NYCHRL to reflect a broader and inclusive understanding of gender. [5]

The United States Supreme Court held in *Bostock v. Clayton County* [6] in 2020 that discrimination on the basis of gender identity was barred by Title VII of the Civil Rights Act of 1964. The EEOC, the federal agency charged with enforcing federal workplace discrimination laws, subsequently issued guidance consistent with *Bostock*: Commission's Enforcement Guidance on Harassment in the Workplace[7]; the EEOC Strategic Plan (2022-2026); and the EEOC Strategic Enforcement Plan Fiscal Years 2024-2028, which included specifically, "targeting discrimination, bias, and hate directed against . . . LGBTQI+ individuals." [8] The EEOC in fiscal

[3] Some reports indicate that the EEOC has decided to halt processing not just gender identity discrimination claims, but sexual orientation claims as well. See here, Ryan Golden & Kate Tornone, *EEOC Tells Its Workers to Halt LGBTQ+ Discrimination Claim Processing*, HR Dive (Jan. 31, 2025), https://www.hrdive.com/news/eeoc-tells-employees-halt-lgbtq-discrimination-cases/738853/.

[4] Andrea Hsu, *How Trump's EEOC Is Attacking DEI and Emphasizing White People*, NPR (Mar. 31, 2026), https://www.npr.org/2025/02/09/nx-s1-5287582/trump-eeoc-dei-civil-rights-diversity.

[5] New York City Comm'n on Human Rights, *Legal Enforcement Guidance on Discrimination on the Basis of Gender Identity or Expression*, NYC.GOV, https://www.nyc.gov/site/cchr/law/legal-guidances-gender-identity-expression.page.

[6] *Bostock v. Clayton County*, 590 U.S. 644 (2020).

[7] U.S. Equal Emp. Opportunity Comm'n, *Enforcement Guidance on Harassment in the Workplace* (Apr. 29, 2024), https://www.eeoc.gov/laws/guidance/enforcement-guidance-harassment-workplace.

[8] U.S. Equal Emp. Opportunity Comm'n, *Strategic Enforcement Plan Fiscal Years 2024–2028* (Sept. 21, 2023), https://www.eeoc.gov/strategic-enforcement-plan-fiscal-years-2024-2028.

year 2023 received more than 3000 charges alleging discrimination based on sexual orientation or gender identity, up more than 36% from the previous year.[9]

II. THE EEOC RENEGES ON ITS OBLIGATION TO TRANS AND NON-BINARY AMERICANS

All this changed after January 20, 2025. In a press release dated January 28, 2025, Acting EEOC Chair Lucas announced that pursuant to Executive Order 14168, one of her priorities for compliance, investigations, and litigation was to "defend the biological and binary reality of sex and related rights, including women's rights to single-sex spaces at work." In other words, not only to abandon claims of discrimination on the basis of gender identity, but to actively support those who carry out such discrimination.

"The Commission's harassment guidance was fundamentally flawed," said Lucas. "It ignored biological reality, effectively eliminated single-sex workplace facilities, and impinged on all employees' rights to freedom of speech and belief. In unlawfully expanding past *Bostock's* dictates, the EEOC exceeded its authority. The EEOC must rescind the guidance and protect the sex-based privacy and safety needs of women." [10]

The EEOC wasted no time putting these words into action. On February 18, 2025, the news media reported that the EEOC moved to dismiss six of its own cases on behalf of workers alleging gender identity discrimination. [11] One of these cases, *Equal Employment Opportunity Commission v. Boxwood Hotels, LLC* (1:24-cv-00902), involved a housekeeper in a New York hotel who was fired after she complained about being the target of multiple derogatory comments by her supervisor, including being referred to as "it".[12]

The EEOC has explicitly chosen, in direct violation of its mandate under Title VII and Supreme Court doctrine, to simply stop pursuing cases based on gender identity discrimination. Whether this takes the form of absolutely refusing to accept new complaints of gender identity discrimination, completely eviscerating employee rights under Title VII, or simply refusing to investigate them, the EEOC's message is clear: the federal government can no longer be relied upon to protect trans and non-binary New Yorkers. Moreover, there have been press reports that

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[9] Claire Savage & Alexandra Olson, *EEOC Seeks to Drop Transgender Discrimination Cases, Citing Trump's Executive Order*, CBS News (Feb. 15, 2025), https://www.cbsnews.com/news/eeoc-transgender-discrimination-cases/.

[10] U.S. Equal Emp. Opportunity Comm'n, *Removing Gender Ideology and Restoring the EEOC's Role of Protecting Women in the Workplace* (Jan. 28, 2025), https://www.eeoc.gov/newsroom/removing-gender-ideology-and-restoring-eeocs-role-protecting-women-workplace.

[11] Claire Savage & Alexandra Olson, *EEOC Seeks to Drop Transgender Discrimination Cases, Citing Trump's Executive Order*, CBS News (Feb. 15, 2025), https://www.cbsnews.com/news/eeoc-transgender-discrimination-cases/.

[12] U.S. Equal Emp. Opportunity Comm'n, *EEOC Sues Boxwood and Related Hotel Franchises for Discriminating Against Transgender Employee*, EEOC, https://www.eeoc.gov/newsroom/eeoc-sues-boxwood-and-related-hotel-franchises-discriminating-against-transgender-employee.

sexual orientation claims are being "paused", again in violation of Title VII. And, as former Commissioner Samuels has warned, there is reason to believe that the EEOC in general will be shifting its focus away from protecting historically disadvantaged populations and even targeting them for discrimination.

Just recently, the EEOC issued a decision allowing federal agencies to bar employees from using the bathroom that fits their gender identity. The first sentence of the decision quotes from Executive Order 14168 and reads, in derogation of the Supreme Court's ruling in *Bostock*: "It is the policy of the United States that 'intimate spaces [in federal workplaces] . . . are designated by sex and not identity.'"[13]

While the EEOC believes that is the "policy of the United States," it is not the policy of the City of New York. Now, more than ever, New York City's trans and non-binary workers need a robust and fully funded CCHR.

III. THE EEOC ABANDONS DISPARATE IMPACT LIABILITY

Disparate impact liability – one important type of civil rights protection – has been an important tool in targeting policies that result in unjust discrimination. More than 50 years ago, the Supreme Court adopted the disparate impact framework for proving discrimination, which Congress codified in 1991 in our federal civil rights laws.[14]

Discriminatory workplace policies persist today. For example, disparate impact liability successfully challenged Walmart's physical ability tests for certain warehouse grocery jobs, which were not correlated to a person's ability to do the work, but made it more difficult for women to be hired for the positions. The case resolved with a $20 million settlement, and Walmart agreed to stop using the tests, allowing more women to compete for relatively high-paying entry-level jobs at grocery distribution centers. [15]

In another example, in *Johnson v. AK Steel Corp.*, a federal court allowed the disparate impact discrimination claim of a female crane operator to continue after she explained that crane operators had to urinate off the back of their cranes instead of taking restroom breaks. The court found that this practice would have a significant discriminatory impact on women given the anatomical differences between men and women and women's hygienic needs.[16]

Disparate impact liability is an important element of the NYCHRL.[17] But as of today, it is no longer an element of federal anti-discrimination law. On April 23, 2025, President Trump

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[13] U.S. Equal Emp. Opportunity Comm'n, *Complaint*, EEOC v. Boxwood Hotels LLC, No. 2025-003976 (filed 2025), https://www.eeoc.gov/sites/default/files/2026-02/2025003976.pdf.

[14] *Griggs v. Duke Power Co.*, 401 U.S. 424, 424 (1971); 42 U.S.C. § 2000e–2(k).

[15] U.S. Equal Emp. Opportunity Comm'n, *Walmart, Inc. to Pay $20 Million to Settle EEOC Nationwide Hiring Discrimination Case* (Sept. 10, 2020), https://www.eeoc.gov/newsroom/walmart-inc-pay-20-million-settle-eeoc-nationwide-hiring-discrimination-case.

[16] *Johnson v. AK Steel Corp.*, No. 1:07-CV-291, 2008 WL 2184230 (S.D. Ohio May 23, 2008).

[17] N.Y.C. Admin. Code § 8-107(17).

announced a policy directive to eliminate the use of disparate impact liability "to the maximum degree possible" and directed federal agencies to deprioritize enforcement of laws and regulations that rely on the doctrine—undermining a cornerstone of civil rights protections that has expanded equal opportunity for decades.[18] The EEOC did as instructed and stopped pursuing disparate impact claims.[19]

As it did for protecting the workplace rights of trans and non-binary workers, the EEOC has now also closed its doors to claims of workplace discrimination based on discriminatory policies. Here, too, and now more than ever, the NYCHRL's disparate impact liability coverage is an essential tool for workplace equity, and the Commission an essential part of securing that protection for New York City workers.

IV. THE ROLE OF THE CITY COMMISSION ON HUMAN RIGHTS

While filing with the EEOC is a prerequisite for bringing a lawsuit under federal anti-discrimination workplace laws, New Yorkers may also exercise their rights under New York City's Human Rights Law, by filing a lawsuit, or by making an administrative complaint to the NYCCHR. Until the EEOC reversed its stance, New York employees could choose to file either with the EEOC or the NYCCHR (or with NYS State Division of Human Rights). For many employees, an administrative agency such as the EEOC or NYCCHR is the forum of choice – when working properly, these agencies can offer a faster, less expensive, more private alternative to litigation in court.

Now that the federal government in general, and the EEOC in particular, has announced that it no longer protects the rights of employees to be free of gender identity discrimination, we can only expect that New Yorkers suffering from such discrimination will be forced to turn to state and local agencies. With the EEOC turning its back on victims of gender identity and sexual orientation discrimination, and its anticipated policy shift away from protecting members of disadvantaged communities, the CCHR will become an important, if not the, critical administrative locus for protection of these New Yorkers and the vindication of their rights.

V. UNDERFUNDING CCHR UNDERMINES CITY GOVERNMENT PRIORITIES AND SERVICES

Effective enforcement of the NYCHRL is key to advancing many of the City's priorities, including workplace rights. This requires a well-funded CCHR that has the capacity to take on these cases.

Among its many protections, the NYCHRL protects workers against discriminatory practices such as sexual harassment, retaliation, lack of disability accommodations, or not providing a place and time for lactating employees to pump breast milk. Female employees, workers of color, and LGBTQIA employees, are some of the groups most vulnerable to these

[18] Exec. Order No. 14281, 90 F.R. 17537 (2025).

[19] Rebecca Klar, *EEOC to Close Workers' Disparate Impact Discrimination Charges*, Bloomberg Law News (Sept. 19, 2025), https://news.bloomberglaw.com/daily-labor-report/eeoc-to-close-workers-disparate-impact-discrimination-charges.

insidious and illegal practices. They are also groups with lower labor force participation[20] and therefore most likely to be targeted by the City's workforce development programs. Providing training and education may prove to ultimately be meaningless if these workers are not hired, not promoted, or unfairly disciplined because of illegal discrimination.

New York City workers should be able to rely on CCHR to address their discrimination claims in a timely manner. Unfortunately, CCHR adjudications are not timely, and during Fiscal Year 2024, CCHR had an "average age of complaint closed" of 593 days, up from 515 days in Fiscal Year 2020 and a 5-year low of 427 days in Fiscal Year 2021.[21] New Yorkers cannot afford to wait so long for workplace justice. In the experience of National Employment Lawyer's Association's New York members, investigations often lag for many months, creating significant hardship for complainants, especially those who are still employed by the employer. By not effectively staffing and resourcing CCHR, the City does a disservice to all employees, but those who are already most vulnerable will bear the brunt of the agency's lackluster performance due to its lack of resources.

By not fully resourcing a critical tool in its arsenal, NYC countermands its own initiatives and commitment to workplace justice. The NYCHRL is not simply a pledge for the City to be more equitable; it is a law that should be enforced with the full weight of the government behind it. Leaving workers exposed to the whims of discriminatory actors in the employment space will not only impede the City's goals of equity but undermine the resources it invests in these crucial areas.

VI. CCHR'S ENFORCEMENT CAPACITY IS LIMITED BY ITS UNDERFUNDING AND UNDERSTAFFING

CCHR has a law enforcement function in a civil context that parallels that of the district attorney's office in a criminal context, serving both a prosecutorial and punitive role through initiating matters and handing down punishment. However, it has a fraction of the funding of the DA, which limits the capacity of the agency's staff. At its best, law enforcement should garner a sense of safety within communities. CCHR has the infrastructure necessary to grant that for NYC workers, but that is meaningless if it's not backed by sufficient resources to power its enforcement capacity.

CCHR has the power to investigate complaints, settle cases, and refer cases to the New York City Office of Administrative Trial and Hearing (OATH) for resolution. It also has the authority to assess fines, obtain monetary damages, and negotiate additional remedies including rehiring, policy change, training, and modifications for accessibility.[22] CCHR plays an important role in mediating reasonable accommodation requests. Under the NYCHRL, employers are required to engage in "cooperative dialogue" with employees who make reasonable

[20] N.Y. State Comptroller, *New York City's Uneven Recovery: Mothers in the Workforce* (May 2023), https://www.osc.ny.gov/reports/osdc/new-york-citys-uneven-recovery-mothers-workforce.

[21] N.Y.C. Comm'n on Human Rights, *Mayor's Management Report: Fiscal Year 2024* (2024), https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/cchr.pdf.

[22] N.Y.C. Comm'n on Human Rights, *2024 Settlement Highlights*, NYC.GOV, https://www.nyc.gov/site/cchr/enforcement/2024-settlements.page.

accommodation requests and CCHR can mediate these matters in the settlement process.[23] However, the capacity issues within CCHR are leaving New Yorkers with potentially viable workplace discrimination claims without a forum to address them due to the backlog in cases. In Fiscal Year 2024 CCHR administratively closed 40% of the 447 cases that it closed that year—approximately 179 cases. While this percentage is down from a 5-year high of 56% in Fiscal Year 2022, the high rate of administrative closures means that CCHR staff initiated some cases, because they determined there may be a viable claim, but failed to decide if the cases should be dismissed or referred, or CCHR staff were unable to settle those cases.[24] Consequently, these 179 cases were shelved without being decided on the merits. If New Yorkers must wait for years to have their discrimination cases reviewed, only to have them administratively closed, they don't have adequate protection from discrimination.[25] When it comes to discrimination, CCHR is the administrator of justice, but City government has not funded or staffed this agency sufficiently to meet that mandate. Consequently, New Yorkers are living in an acute state of lawlessness concerning discrimination, because their enforcement agency is under-resourced.

CCHR's settlement capacity is also limited by the agency only employing one mediator. Mediation often speeds up settlement. However, the existence of a single mediator and the fact that *pro se* litigants unrepresented by counsel do not have access to CCHR's mediation contribute to CCHR's backlog of cases. These problems undermine the deterrent effect of having a watchdog agency with the power to enforce penalties against those who violate the NYCHRL, because failing to sufficiently fund CCHR cuts the teeth of the agency. It also wastes the efforts of the City Council to continuously amend the NYCHRL and expand civil rights to New Yorkers, because CCHR's responsibilities continue to expand without sufficient staff and funding to carry out the work. In Fiscal Year 2024 CCHR administratively closed approximately 6 times more cases (179) than it mediated (31).[26] The need for a sufficiently staffed and funded CCHR is also about creating proactive enforcement, to keep the caseload and backlog down through both deterrence and timely enforcement of the NYCHRL.

CCHR also needs funding to dedicate staff to publicizing its work and offering policy positions within its guidance. This policy guidance would clarify how the NYCHRL will be applied by CCHR and create a deterrent effect for those looking to discriminate against New Yorkers, while also educating New Yorkers about their rights. Without sufficient funding and staffing, CCHR does not have the capacity to enforce these laws, leaving New Yorkers without essential protection.

While it is clear that CCHR is underfunded and understaffed, it can be difficult to gauge the extent of the problem due to gaps in reporting. In Fiscal Year 2024, CCHR received 13,360 inquiries, up from 10,015 in Fiscal Year 2020 and a 5-year low of 9,055 in Fiscal Year 2021, and it initiated 868 matters, down from 1,307 in Fiscal Year 2020. CCHR also reported having 1,206

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[23] N.Y.C. Admin. Code tit. 8, ch. 1 (Commission on Human Rights), https://www.nyc.gov/site/cchr/law/chapter-1.page.

[24] N.Y.C. Comm'n on Human Rights, *Mayor's Management Report: Fiscal Year 2024* (2024), https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/cchr.pdf.

[25] *Id.*

[26] *Id.*

open matters in Fiscal Year 2024, down from 2,398 in Fiscal Year 2020 and a 5-year high of 2,411 in Fiscal Year 2021.[27] While there could be several reasons why the number of matters initiated by CCHR has plummeted, including an attempt to address the backlog of open matters, the reporting from the agency is insufficient to draw a clear picture. There is a need for greater transparency in reporting, because it is not clear how many of CCHR's cases are held over from year to year. A worker experiencing discrimination at their job does not have years to wait for relief. This type of backlog is unacceptable and needs to be addressed with increased funding and staffing.

VII. CCHR'S LIMITED CAPACITY LEAVES NEW YORKERS WITHOUT JUSTICE

We are in the middle of a crisis, and the New York City government must act with the urgency of the last line of defense against discrimination in a context where federal anti-discrimination law and policy can no longer be relied upon.

To be clear, the work of CCHR has always been urgent, not only because anti-discrimination work is essential for all the reasons mentioned in this testimony, but also because there are protections that New York City residents enjoy that don't exist on the federal level. However, the urgency has increased under a federal administration that is dismantling decades of anti-discrimination law.[28] New Yorkers cannot afford a budget issue to stand between them and possibly their only forum for asserting many of their civil rights. City government must be accountable to its constituents. In this moment, recognizing a potential increased need for the services of CCHR, City government must act to increase funding.

VIII. CREATING A MORE RESPONSIVE AND BETTER RESOURCED CCHR

We ask that City Council allocate $25 million to give CCHR the resources necessary to work through its caseload, prepare for the possibility of an influx of cases due to the changes at the federal level, put resources towards educating the public about their rights and the work of CCHR, and decide cases on the merits, including through a robust mediation process.

In the years immediately prior to the pandemic, CCHR's budget peaked at $14 million, which adjusted for inflation is approximately $16.2 million today. This funding was insufficient before the pandemic, and City government has failed to allocate this level of funding since. With that amount of funding CCHR was administratively closing 51% of the cases it closed in Fiscal Year 2020, 60% in Fiscal Year 2019, 68% in Fiscal Year 2018, 65% in Fiscal Year 2017, and 62% in Fiscal Year 2016.[29] CCHR should also be staffed to address at least 10% of its cases through mediation to reduce the waiting times for complainants with viable claims. We believe the increase in both funding and mediation capacity is necessary to protect the civil rights of New Yorkers.

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[27] *Id.*

[28] Russell Contreras & Emily Peck, *Trump Rolls Back Bedrock Civil Rights Measure in Sweeping Anti-DEI Push*, Axios (Jan. 21, 2025), https://www.axios.com/2025/01/22/trump-dei-lbj-rollback.

[29] N.Y.C. Comm'n on Human Rights, *Mayor's Management Report: Fiscal Year 2020* (2020), https://www.nyc.gov/assets/operations/downloads/pdf/mmr2020/cchr.pdf.

For these reasons, the City Bar strongly urges increased funding and staffing for the Commission on Human Rights, to support its critical work on behalf of all New Yorkers, and to enable the Commission to do its job to enforce New York City's anti-discrimination laws, on behalf of all New Yorkers.

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