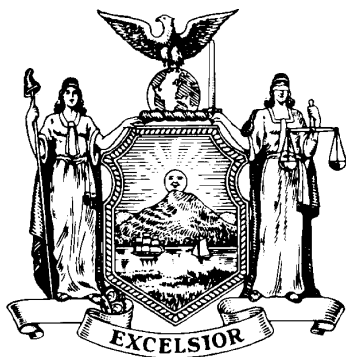


State of New York
Offices of the Inspector General



Investigation of the
Roosevelt Island Operating Corporation

April 2025

Lucy Lang
Inspector General

EXECUTIVE SUMMARY

In September and October 2023, the Office of the New York State Inspector General received a complaint alleging improprieties by executive staff of the Roosevelt Island Operating Corporation (RIOC), a New York State public benefit corporation responsible for the development and operation of Roosevelt Island, a largely residential island in New York City's East River. Of particular note, one of the allegations stated that RIOC improperly procured artificial online reputation management services for RIOC and certain of its executive staff. These services exploit the ways search engines compile and present results by flooding search engines with so much favorable information about a client that online searches prioritize this favorable coverage and thereby make negative results more difficult to find.

This report, which focuses on the Inspector General's investigation of RIOC's procurement and use of an online reputation management firm, found that RIOC's actions were improper, self-serving for certain members of RIOC's executive staff, and contrary to public policy. Indeed, the investigation found that RIOC's President and CEO, Shelton Haynes, and his then executive team used a contract with an online reputation management firm to further their own online reputations—not that of RIOC. The investigation also determined that the actions of Haynes and his team reflected a misuse of public funds for individual gain that may implicate the provisions of the New York Public Officers Law Code of Ethics.¹ Moreover, RIOC tasked its then Assistant Vice President (AVP) of Communications and Public Affairs, Akeem Jamal, to manage this contract despite his personal interest in the suppression of negative articles written about him, many of which involve matters that predate his employment with RIOC. This assignment was inappropriate, created an appearance of impropriety, and exemplified RIOC's disregard of contract provisions addressing potential conflicts. Lastly, the investigation found that had RIOC used the services of a firm to suppress negative online information about RIOC—rather than its executive staff—it would still be a wrongful use of state funds, as the government's use of state resources in the suppression of public speech for personal benefit is improper and inconsistent with New York State policies on openness and transparency in government.

¹ New York Public Officers Law section 74.

COMPLAINT AND RIOCR BACKGROUND

In September and October 2023, the Inspector General received a complaint forwarded from the New York State Division of Housing and Community Renewal² (DHCR) alleging that RIOCR and its executive staff may be engaging in multiple improprieties regarding its procurement and employee compensation practices. Included among these allegations was a claim that RIOCR entered into an improper contract with a firm specializing in artificial online reputation management. Artificial online reputation management is a practice by which search engine results are manipulated by flooding the internet with a great deal of positive information about a client—sometimes including flattering articles of little substance presented on online platforms designed to host such articles and multiple links to the same. Through this process, online searches prioritize favorable client coverage and thereby drown out negative results about a client, which appear on ever subsequent search engine results pages.

Roosevelt Island is an approximately two-mile long island in the East River situated between Manhattan and Queens that is home to about 12,000 residents. In 1984, the State legislature established RIOCR as a public benefit corporation tasked with the overall plan, design, development, operation, maintenance, and management of the island. The corporation is managed by a nine-person Board of Directors responsible for exercising RIOCR's powers. That board is also responsible for the appointment of RIOCR's executive staff, including a president and chief executive officer (CEO), general counsel, chief financial officer (CFO), and chief operating officer (COO), and AVPs. This executive staff discharges the functions and powers of RIOCR, including, for example, managing RIOCR's contracts and maintaining public safety on the island.

From March 2021 to November 2024, Shelton Haynes served as RIOCR's president and CEO. Prior to his elevation to that role, Haynes served as the corporation's COO. Although Haynes's executive team had significant turnover during his tenure, his staff at various relevant times has included Vice President and General Counsel Gretchen Robinson, AVP of Administration Tajuna Sharpe, and AVP of Communications and Public Affairs Akeem Jamal.

As relevant to this investigation, among the regulations governing RIOCR's management are the RIOCR Guidelines Regarding the Use, Awarding, Monitoring and Reporting of

² RIOCR's Board of Directors is composed of nine members including the DHCR commissioner, who serves as the chair.

Procurement Contracts (Procurement Guidelines). Pursuant to the Procurement Guidelines, contracts valued under \$175,000 that will be completed within one year must be approved by the corporation’s CEO, CFO, COO, or general counsel.³ The guidelines further mandate that procurement contracts valued at \$175,000 or more, along with personal services contracts “to be rendered over a period in excess of one year,” must be approved by RIOC’s Board of Directors.⁴ Lastly, per the guidelines, RIOC’s board must be notified if corporation staff “anticipate[] that a contract may need to be extended beyond one year.”⁵

METHODOLOGY

The findings in the Inspector General’s investigation were based on a review of records produced as part of RIOC’s procurement along with interviews of former and current RIOC staff. The records reviewed included internal emails; materials created to procure the contract, including draft requests for proposals; the contract itself; and work product created as part of the contract, including monthly progress reports.

FINDINGS OF FACT

RIOC AND ITS RELATIONSHIP WITH LOCAL BLOGS

In recent years, RIOC has been the subject of negative press,⁶ with especially voluminous and consistent coverage stemming from two local blogs: the Roosevelt Island Daily News⁷ and the Roosevelt Islander. These blogs feature extensive, regular coverage of RIOC, its board, and its executive staff. Much of this coverage criticizes RIOC’s management and operations and specifically alleges Haynes is incompetent and unqualified.⁸ According to current and former RIOC employees, this negative coverage—and especially these local blogs—adversely affected Haynes, the rest of the executive team, and RIOC employees. These

³ RIOC Procurement Guidelines § 10, Contract Approval (May 9, 2019).

⁴ *Id.*

⁵ Procurement Guidelines § 10.2.

⁶ See, e.g., Nick Garber, *Claims of 'chaos,' corruption engulf Roosevelt Island governing body*, Crain’s New York, Apr. 4, 2023 (<https://www.craigslist.com/politics/claims-chaos-corruption-engulf-roosevelt-island-governing-body>).

⁷ The Roosevelt Island Daily News is the source for the vast majority of the negative coverage regarding Haynes and RIOC. Notably, the blog is the product of a single writer.

⁸ See, e.g., David Stone, *Did Haynes Crash RIOC’s Staff Eval System for a Selfish Purpose?*, Roosevelt Island Daily News, Oct. 28, 2022 (<https://rooseveltislanddaily.news/2022/10/28/did-haynes-crash-riocs-staff-eval-system-for-a-selfish-purpose/>); David Stone, *The Case Against Shelton Haynes Is Strong. So, Why Is He Still Here?*, Roosevelt Island Daily News, Mar. 8, 2023 (<https://rooseveltislanddaily.news/2023/03/08/the-case-against-shelton-haynes/>); and Roosevelt Islander, *Who’s In Charge Of Dysfunctional Roosevelt Island Operating Corp? RIOC President Shelton Haynes Tells RIOC Board Directors Not To Communicate With Staff And Staff Not To Talk With RIOC Board Directors*, Oct. 2, 2023 (<https://rooseveltislander.blogspot.com/2023/10/whos-in-charge-of-disfunctional.html>).

employees described Haynes to the Inspector General as fixated on his public image and the amount of negative press that he and his colleagues received.

Haynes and his team went as far as to compile a multi-page memorandum on RIOC letterhead that Haynes and his staff referred to as a “dossier,” setting forth a detailed discussion on the corporation’s coverage in these blogs. The Inspector General reviewed this dossier, which describes a process by which Haynes’s team reviewed over 700 blog posts about RIOC and compared the coverage of Haynes and his staff to that of previous RIOC administrations. The dossier also analyzed what Haynes and his staff described as “racially charged” undertones in the articles and listed positive stories Haynes and his staff believed were unreported. It is in this context that, in late 2022, RIOC began the solicitation process to retain a firm to perform reputation management in the guise of search engine optimization (SEO) services on behalf of the corporation.

SEARCH ENGINE OPTIMIZATION AND REPUTATION MANAGEMENT

RIOC’s 2022 search for contractors ostensibly sought SEO services to improve RIOC’s online presence. Specifically, according to RIOC’s August 18, 2022, Request for Proposals (RFP), the objectives of the contract were to “enhance the online branding of the corporation [and] create and promote content that provides the experience of RIOC, its successes and achievements, while reinforcing its credibility among stakeholders, and ensure that positive links and information appear on the initial page of search results.” However, the Inspector General found that the true purpose of the procurement—and a specialty of the firm ultimately selected—was artificial reputation management with the goal of burying negative press about certain members of RIOC’s executive team. As discussed below, the difference between these two services is significant, especially in the context of government procurement.

Search Engine Optimization

SEO is a technique by which online content is created or redesigned “to attract search engines and convince them to rank content highly.”⁹ A firm specializing in SEO seeks to ensure its client’s online content is prominently featured on search engines when certain keywords are searched. The benefit of this practice is to make the content in question “easier for search engines and users to access.”¹⁰ Higher rankings on search engines are desirable simply because

⁹ James Grimmelmann, *The Structure of Search Engine Law*, 93 Iowa L. Rev. 1, 13 (2007).

¹⁰ *Id.*

“[u]sers are more likely to click on the first result than the second, the second than the third, and so on” when conducting online searches.¹¹ If a user’s content does not appear “on the first few pages of results,” that content “may as well not exist.”¹²

Optimizing search engine results can be accomplished in several ways. For example, specific phrasing in web page locations known as “URL links” and organized online directories can help boost results for specific search terms.¹³ Similarly, using links to other, related websites can help raise the standing of a website on a search engine’s results page.¹⁴ The inverse of this process is also true—if other, unaffiliated websites contain links to a user’s site, the user’s site will appear more prominently on search engine result pages. This latter concept is known as “backlinking.”

While backlinks can occur organically and drive traffic to a website, firms specializing in SEO can proactively use the technique to their advantage by using other websites to host links to their client’s site, thereby increasing their client’s standing on a search engine. For example, an SEO firm could write or host blogs or articles on websites seemingly unaffiliated with their client’s site and, on these blogs or articles, include links to the client’s page. Even though the firm is ultimately the source of the links to their client’s website, search engines can read the artificial backlinks as positive indicia of traffic and, thus, rank the client’s site higher on the search engine as a result.

Online Reputation Management

Unlike SEO, the goal of reputation management is not merely to improve users’ ability to locate certain websites online. Rather, reputation management firms aim to “drive unflattering messages about [their clients] from search engine prominence.”¹⁵ This can be accomplished by “bombarding the internet with information.”¹⁶ Put differently, reputation management is a practice by which SEO techniques—such as backlinking—can be used to produce an overwhelming amount of favorable information on a particular subject online. This information is then picked up by search engine algorithms and, through savvy SEO practices, rises to the top

¹¹ *Id.* at 31.

¹² *Id.*

¹³ See, e.g., Google.com, *Search Engine Optimization (SEO) Starter Guide* (<https://developers.google.com/search/docs/fundamentals/seo-starter-guide>).

¹⁴ *Id.*

¹⁵ See, Grimmelman, *supra* note 8, at 39.

¹⁶ See, Michal Lavi, *The Good, the Bad, and the Ugly Behavior*, 40 *Cardozo L. Rev.* 2597, 2624 (2019).

of search engine result pages. This occurs at the expense of the purported “unflattering message,” which ranks lower and lower in search engine results as more favorable information appears, with the goal of ultimately burying the message so low in results that it is not readily discoverable by searchers.

Online reputation management can occur organically or artificially. For example, an individual with a large public platform can organically create news or content to populate search engine results. This could include, for example, holding press conferences, conducting interviews with news organizations, or participating in community outreach. These actions would generate fresh online press, thereby populating search engines with information that would naturally cause pre-existing information to rank lower on results pages. For individuals lacking such a platform, however, reputation management firms can artificially create a groundswell of online content by drafting flattering articles about the subject and publishing them on various websites.

Such articles need not be especially substantive nor do the websites on which the articles are published need be authoritative or even relevant; rather, the sole purpose of publishing the articles at all is for them to be found and ranked highly by search engine algorithms. This practice is pervasive enough that there are websites designed specifically to host these types of articles in exchange for payment. By creating enough of this content, the firm can ultimately flood search engine result pages with enough positive information about the subject that whatever negative information exists is ranked lower on search engine result pages. It is this latter, artificial form of reputation management that RIOC sought when it solicited bids for “media services” in August 2022.

RIOC’S PROCUREMENT OF A REPUTATION MANAGEMENT FIRM

RIOC’s August 2022 RFP sought a contractor to provide “media services” for the corporation for a period of one year. Initially, RIOC considered availing itself of the New York State Office of General Services’ (OGS) centralized contract for statewide “media buying services.”¹⁷ Pursuant to this centralized contract, contractors preapproved by OGS could provide “strategic media planning, buying, and placement across all types of media platforms” and would “deliver expert solutions in utilizing the most effective and efficient media for individual

¹⁷ See, <https://online.ogs.ny.gov/purchase/snt/awardnotes/7905023171ContractorInfo.pdf>.

campaign goals.”¹⁸ Notably, “creation and production of media as creative work associated with the media buy” was “specifically excluded” from the centralized contract.¹⁹ A representative from OGS explained to the Inspector General that artificial reputation management would similarly not have been covered under the centralized contract. In an email dated August 16, 2022, RIOC’s then director of organizational efficiency & special projects determined that, “[u]pon further discussion,” RIOC would be conducting its own RFP for “media services” instead of availing itself of OGS’s pre-existing centralized contract.

Early versions of RIOC’s RFP provide context into the actual services the corporation sought. The initial draft RFP contained the following overview:²⁰

For the last few years, there have been several published articles full of disinformation that have negatively affected the organization. RIOC and its employees are targeted by these social media outlets.

Despite the collective efforts to correct these falsehoods for the betterment of Roosevelt Island, there is little to no content or, media coverage focusing on these efforts. This lack of quality content has given an opportunity for these negative articles to influence the online narrative of the organization. Online narratives have a way of shaping conversations offline.

To repair and restore search results for RIOC and would like a digital reputation management campaign designed to:

- Enhance the online reputation of the corporation.
- Suppress negative target links from the initial page of search results.
- Create and promote content that rightfully provides the experience of RIOC, their credibility, and their successes.

¹⁸ See, <https://online.ogs.ny.gov/purchase/snt/awardnotes/7905023171HowtoUse.pdf>.

¹⁹ *Id.*

²⁰ The following language is presented as a screenshot of materials reviewed by the Inspector General. This screenshot, along with all others found in this report, is presented as it appears in the source material and, therefore, may contain errors in drafting.

This language was later revised, with the RFP’s final language reading:

For the last few years, RIOC has established a presence on various social media platforms, including but not limited to Twitter, Instagram, and Facebook, among other outlets; and is now seeking to engage a social media firm to launch a digital branding and management campaign that will be designed to promote positive media content and media coverage for the corporation, its departments, and its employees. The media firm will also aim to provide a positive reinforcement of RIOC’s business objectives, priorities, culture, mission, and commitment to its stakeholders. The promotion of quality media content will allow RIOC to influence the online narrative of the organization and its collective efforts, which will also aid in shaping conversations about the corporation offline.

The objectives of this digital branding and management campaign should include:

- Enhance the online branding of the corporation.
- Create and promote content that provides the experience of RIOC, its successes and achievements, while reinforcing its credibility among stakeholders, and ensure that positive links and information appear on the initial page of search results.

These revisions removed the language commenting on negative articles published about RIOC and its employees and on the suppression of negative links and reframed the campaign from one of “digital reputation management” into “digital branding and management.”

Six firms bid on the RFP. First Page Management, LLC d/b/a Status Labs (Status Labs) was ultimately selected as the winning bidder. Status Labs’s bid totaled \$168,680—an amount just below the \$175,000 threshold necessary for RIOC board approval. Despite the above language being removed from the RFP, Status Labs’s bid package specifically acknowledged that “local bloggers and others have published articles that have negatively affected” RIOC and highlighted the firm’s prior experience in developing a “custom digital reputation management strategy to help suppress . . . links” from appearing on the first page of search engine results.

THE STATUS LABS CONTRACT

Contract Execution and Management

On October 25, 2022, RIOC entered into a one-year contract with Status Labs for reputation management services and tasked Jamal, then its new AVP of communications and public affairs, to serve as the contract’s manager. Jamal joined RIOC in late 2022 and, according to Haynes, was hired in part to “uplift Roosevelt Island’s public profile within the city, state, and nationwide.”²¹ Jamal also joined the selection committee for the media services RFP and, thus,

²¹ RIOC Press Release, President & CEO Shelton J. Haynes Announces New Appointment, Oct. 20, 2022 (<https://rioc.ny.gov/CivicAlerts.aspx?AID=368>).

one of his first tasks at RIOC was the selection of the Status Labs contract. Jamal had also been the subject of negative media coverage at the time of his hire and had also been written about by the local Roosevelt Island blogs.²²

Notably, language in the contract reflects the importance of avoiding conflicts involving RIOC employees. Specifically, Status Labs was required to represent the following:

1. No officer, employee, agent or director of RIOC, shall participate in any decision relating to this Contract which affects their personal interest or the interests of any corporation, partnership, or association in which he is directly or indirectly interested; nor shall any officer, agent, director or employee of RIOC have any interest, direct or indirect, in this Contract.

Although this provision reflected an affirmative representation on the part of Status Labs, it was language drafted and contemplated by RIOC as part of the RFP process. This broad prohibition therefore demonstrates the necessity to avoid improprieties associated with decision-making by RIOC employees with a “personal interest” in the contract.

Status Labs’s Objectives

Status Labs’s work on the contract began in November 2022. Monthly during the contract term, Jamal received a “Progress Report” from Status Labs. Each report featured an “overview” that is illustrative of the goals Status Labs sought to accomplish on behalf of RIOC.²³ For example, on March 2, 2023, Status Labs sent the following:

²² See, e.g., David Stone, *AVP Akeem Jamal Doesn’t Meet RIOC Requirements. Why Was He Hired?*, Roosevelt Island Daily News, Sep. 7, 2022 (<https://rooseveltislanddaily.news/2022/09/07/avp-akeem-jamal-doesnt-meet-rioc-requirements-why-was-he-hired/>).

²³ Of note, Status Labs misnamed both its client (“Rochester Island Operating Corporation”) and where progress would be measured from (“Rochester Island”) in its monthly status reports to RIOC.

CAMPAIGN OVERVIEW

Status Labs is four months into a 12-month digital reputation management campaign on behalf of Rochester Island Operating Corporation (RIOC) to suppress the identified negative content from page 1 of Google search results. Progress is measured from Rochester Island, NY. Campaign objectives are as follows:

- Suppress the negative content from page one of Google.com search results for the keyword, "Akeem Jamal" searching from New York, NY.
- Suppress the negative content from page one of Google.com search results for the keyword, "Tajuna Sharpe" searching from New York, NY.
- Suppress the negative content from page one of Google.com search results for the keyword, "Shelton Haynes" searching from New York, NY.
- Suppress the negative content from page one of Google.com search results for the keyword, "Gretchen Robinson" searching from New York, NY.
- Curation and branding building for the keyword "RIOC" searching from New York, NY.

The reports also measured the project's progress by charting out the "positions of impending negative links on Google.com search results for . . . target keywords" over the contract's lifespan.

The "negative links" measured included:

- Articles from the Roosevelt Island Daily News about Haynes,²⁴ Sharpe,²⁵ Robinson,²⁶ and Jamal.²⁷
- Articles from the Roosevelt Islander about Haynes.²⁸
- Articles from the Yonkers Tribune about Jamal.
- Posts on Pinterest about Jamal.²⁹
- Links to Court Listener about Robinson.³⁰

²⁴ E.g., David Stone, *Roosevelt Island Virtual Reality Gifts Shelton Haynes with Super Powers*, Roosevelt Island Daily News, Dec. 28, 2022 (<https://rooseveltislanddaily.news/2022/12/28/roosevelt-island-virtual-reality-gifts-shelton-haynes-with-super-powers/>).

²⁵ E.g., David Stone, *Behind Closed Doors at RIOC, the Strange Promotion of Tajuna Sharpe*, Roosevelt Island Daily News, Sep. 24, 2021 (<https://rooseveltislanddaily.news/2021/09/24/rioc-promotion-of-tajuna-sharpe/>).

²⁶ E.g., Roosevelt Island Daily News, *Gretchen Robinson Archives* (<https://rooseveltislanddaily.news/tag/gretchen-robinson/>).

²⁷ E.g., David Stone, *RIOC Silently Adds a New AVP Akeem Jamal*, Roosevelt Island Daily News, Aug. 31, 2022 (<https://rooseveltislanddaily.news/2022/08/31/rioc-silently-adds-a-new-avp-akeem-jamal/>).

²⁸ E.g., Roosevelt Islander, *Serious Allegations Of Wrongdoing Made Against RIOC President & Executive Staff By Purported Whistleblower Employees, Read The Full Document - Assembly Member Seawright And City Council Member Menin Call For Investigation, Allegations Referred To NY State Inspector General*, Mar. 28, 2022 (<https://rooseveltislander.blogspot.com/2022/03/serious-allegations-of-wrongdoing-made.html>).

²⁹ <https://www.pinterest.com/pin/yonkers-insider-yonkers-newswire-not-guilty-akeemjamaal-who--845199055054118947/>.

³⁰ Court Listener, *Eliav v. Roosevelt Island Operating Corporation (1:22-cv-09978)*, (<https://www.courtlistener.com/docket/65871254/eliav-v-roosevelt-island-operating-corporation/>).

Status Labs endeavored to drive these “negative links” further down on the results of the first page on Google when searching for each applicable term, with the ultimate goal of placing these links outside the top 100 Google³¹ search results.

The March 2, 2023, Progress Report serves as an illustrative example of each monthly update Status Labs provided to Jamal. The report sets out how negative content about each member of Haynes’s team was performing on Google over the project’s first four months and details Status Labs’s continued efforts to suppress this content for each team member:

- Shelton Haynes³²

GOOGLE.COM ORGANIC SEARCH										
KEYWORD	NEGATIVE ARTICLES TO SUPPRESS	START 11/3	MO 1 12/6	MO 2 1/3	MO 3 2/8	MO 4 3/2	MO 5 4/3	MO 6 5/3	MO 7 6/3	MO 8 7/3
Shelton Haynes	<i>3 Reasons, Over the Weekend, Why Shelton J. Haynes Must Go</i>	#3	#4	#10	NT 100	NT 100	-	-	-	-
	<i>Shelton Haynes Before RIOC ...How Did He Wind Up Here?</i>	#4	#5	#17	NT 100	NT 100	-	-	-	-
	<i>Roosevelt Islander - Serious Allegations...</i>	-	#9	#18	NT 100	NT 100	-	-	-	-
	<i>Roosevelt Island Virtual Reality Gifts Shelton Haynes with Super Powers</i>	-	-	#11	NT 100	NT 100	-	-	-	-
	<i>Shelton Haynes Archives</i>	-	-	-	#9	#7	-	-	-	-



³¹ It should be noted that, while Status Labs used Google as its metric for measuring the success of its campaign, the firm’s efforts to suppress negative articles about Haynes and his team would have influenced results on any major search engine.

³² “NT” as it appears in the below screenshots represents that the “articles are no longer ranking in the top 100” Google search results.

- Tajuna Sharpe

GOOGLE.COM ORGANIC SEARCH										
KEYWORD	NEGATIVE ARTICLES TO SUPPRESS	START 11/3	MO 1 12/6	MO 2 1/3	MO 3 2/8	MO 4 3/2	MO 5 4/3	MO 6 5/3	MO 7 6/3	MO 8 7/3
Tajuna Sharpe	<i>Behind Closed Doors at RIOC, the Strange Promotion of ...</i>	#3	#3	#3	#3	#3	-	-	-	-
	<i>Serious Allegations Of Wrongdoing Made Against RIOC ...</i>	#8	#8	#8	#5	#6	-	-	-	-

Tajuna Sharpe

Given our limitations with publishing new content, results have not changed much. That being said, we are seeing minimal progress with our backend SEO efforts, but it won't be enough to successfully clear page one. As you can see from the graph below, the higher-ranking *Roosevelt Island Daily* has moved down 3 times since we started the campaign.



And the *Roosevelt Islander* is indicating a slight downward trend, as you can see from the graph below.



We've yet to see a change in search results for the article titled "*Behind Closed Doors at RIOC...*" which remains at position #3, but we saw the article titled "*Serious Allegations of Wrongdoing Made...*" move in the right direction from position #5 to #6. As a reminder, our strategy is heavily reliant on content creation.

- Akeem Jamal

GOOGLE.COM ORGANIC SEARCH										
KEYWORD	NEGATIVE ARTICLES TO SUPPRESS	START 11/3	MO 1 12/6	MO 2 1/3	MO 3 2/8	MO 4 3/2	MO 5 4/3	MO 6 5/3	MO 7 6/3	MO 8 7/3
Akeem Jamal	<i>RIOC Silently Adds a NEW AVP Akeem Jamal</i>	#3	#3	#3	#3	#4	-	-	-	-
	<i>Roosevelt Island Daily - AVP Akeem...</i>	-	#4	NT 100	NT 100	NT 100	-	-	-	-
	<i>Lohuhd - Yonkers staffer accused...</i>	#8	#11	#15	#7	#24	-	-	-	-
	<i>Pinterest - Akeem Jamal...</i>	#9	#13	#14	#16	#11	-	-	-	-
	<i>Yonkers Tribune - AKEEM JAMAAL: Personal Autonomy v Public Health By...</i>	#10	NT 100	NT 100	#14	NT 100	-	-	-	-
	<i>Yonkers Tribune - Akeem Jamal Day...</i>	-	#8	#6	#8	#18	-	-	-	-
	<i>Yonkers City Hall Employee Akeem Jamal has suffered ...</i>	-	-	-	-	#7	-	-	-	-

Akeem Jamal

We continue to see great progress four months into the campaign. Only 2 out of 7 articles remain on page one, and two of them are no longer ranking in the top 100 results. As of today, we saw a new Facebook listing ranking at #7 and we're working to suppress this as well. Notably, the *Roosevelt Island Daily News* article moved down one position from #3 to #4. To give you insight on its daily movement, please reference the position history graph below – you can see that it's been fluctuating since we started the campaign but since early February, it's been consistently ranking at the #4 position.



- Gretchen Robinson

GOOGLE.COM ORGANIC SEARCH										
KEYWORD	NEGATIVE ARTICLES TO SUPPRESS	START 11/3	MO 1 12/6	MO 2 1/3	MO 3 2/8	MO 4 3/2	MO 5 4/3	MO 6 5/3	MO 7 6/3	MO 8 7/3
Gretchen Robinson	<i>Roosevelt Island Daily - Gretchen...</i>	#6	#4	#5	#8	NT 100	-	-	-	-
	<i>Court Listener - Eliav v. Roosevelt</i>	-	-	-	#10	NT 100	-	-	-	-
	<i>Gretchen Robinson Archives - The Roosevelt Island Daily</i>	-	-	-	-	#10	-	-	-	-

Gretchen Robinson

We continue to see great progress four months into the campaign. The article moved from position #6 at the start of the campaign to position #4 in December to position #5 in January, to position #8 in February, and is outside of the top 100 in March. We continue to see Gretchen's *Ideamensch* and *Principal Post* article ranking on page 1. This is an indicator of our abilities when we're able to publish content to drive positive results. We saw a link to archived articles about Gretchen on the Roosevelt Island Daily blog appear at position #10 however and will monitor this accordingly.

Status Labs's Use of SEO and Artificial Reputation Management

To effectuate the suppression of negative search results involving RIOC executives, Status Labs employed SEO and artificial reputation management techniques. Specifically, the firm wrote multiple flattering articles about Haynes and his team and published them on various websites to flood search engine result pages. Many of these websites were designed or are advertised as an appropriate space to host puff pieces regarding subjects looking to exploit search engine SEO algorithms to scrub online reputations.³³ When published, these articles included backlinks to RIOC's website thereby further boosting their standing on search engines. Status Labs also used a "proprietary engagement tool" that directed artificial traffic to these articles to help boost engagement and further improve their search standing.

By way of example, at the start of the contract term in November 2022, Status Labs sent Jamal two draft articles meant to "hit the ground running" on the contract. These articles were written by Status Labs staff and titled "Who is Shelton Haynes? Everything You Need to Know About the RIOC CEO" and "RIOC CEO Shelton Haynes' Plans to Elevate NYC's Historic Roosevelt Island, A Hidden NYC Gem." Jamal was invited to edit the articles and to advise Status Labs once they were approved. After rounds of edits by Haynes and his staff, these

³³ Even where the websites used by Status Labs were not specifically designed for artificial reputation management, the sites acknowledge, tacitly or otherwise, that they can be used for reputation management. For example, the FAQ section of the *Principal Post*—a site discussed further below—denies that the website is a reputation management service but acknowledges that "we may play a vital role in your reputation management strategy." See *Frequently Asked Questions*, *Principal Post* (<https://www.principalpost.com/faq>).

articles were ultimately published in CEOWORLD Magazine³⁴ and BOSS Magazine,³⁵ respectively.

Throughout the life of the year-long contract, Status Labs continued to draft articles about Haynes, Robinson, Sharpe, and Jamal on a regular basis for publication on various websites and platforms. Haynes and members of the executive team also sat for interviews with Status Labs to flesh out content for these articles and participated in their review and editing. Haynes and Jamal also arranged for the executive team to sit with a photographer to provide headshots for the articles in question. These activities all occurred during RIOC work hours. The campaign ultimately produced and published over 17 articles about Haynes and the executive team at RIOC.³⁶

In some instances, Status Labs paid to have articles published on news websites as sponsored content.³⁷ These articles contained disclaimers that the articles are not a product of the publishing site and are paid advertising. Other times, Status Labs published articles on websites whose connection to RIOC are tenuous at best, including the Venture Capital Post,³⁸ a website that describes itself as providing “insight into the newest start-ups and latest trends in

³⁴ Anna Papadopoulos, *Who Is Shelton J. Haynes? Everything You Need To Know About the Roosevelt Island Operating Corporation CEO and President*, CEOWORLD Magazine, Dec. 23, 2022 (<https://ceoworld.biz/2022/12/23/who-is-shelton-j-haynes/>). Notably, freelance writers advertise writing articles on CEOWORLD for a fee as a method of driving traffic to a particular website. See, e.g., <https://www.peopleperhour.com/services/ceoworld?ref=search>.

³⁵ BOSS Editorial, *RIOC CEO Shelton Haynes’ Plans to Elevate NYC’s Historic Roosevelt Island, A Hidden NYC Gem*, BOSS Magazine (<https://thebossmagazine.com/shelton-haynes-roosevelt-island/>). A web search revealed that other freelance writers advertise writing and publishing articles on BOSS Magazine to help drive web traffic for a fee. See, e.g., <https://www.upwork.com/services/search?q=The%2520Boss%2520Magazine>.

³⁶ It should be noted that at least one article published by Status Labs contained misinformation about RIOC. That article, “Shelton Haynes on Shaking Up Roosevelt Island Operating Corporation to Improve the Community,” (see <https://eprnews.com/shelton-haynes-on-shaking-up-roosevelt-island-operating-corporation-to-improve-the-community-675093/>) conflated RIOC’s total spending on capital projects between 2019-2021 with the average amount spent in that same window. RIOC’s then assistant CFO/comptroller raised the error to Haynes who denied knowledge of the article and deferred to Jamal. The article was ultimately corrected.

³⁷ See, e.g., *Roosevelt Island: A Hidden Gem Nestled Between Queens & New York City At the Helm of the State Ran Agency is President & CEO Shelton J. Haynes*, City & State, Feb. 13, 2023 (<https://www.cityandstateny.com/sponsors/sponsor-content/2023/02/roosevelt-island-hidden-gem-nestled-between-queens-new-york-city-helm-state-ran-agency-president-ceo-shelton-j-haynes/382827/>).

³⁸ David Thompson, *RIOC’s CEO Shelton Haynes Says Roosevelt Island Boasts a Model Public Safety Department*, Venture Capital Post, Mar. 31, 2023 (<https://www.vcpost.com/articles/124008/20230331/rioc-s-ceo-shelton-haynes-says-roosevelt-island-boasts-a-model-public-safety-department.htm>). Freelance writers advertise writing articles on the Venture Capitalist Post to drive traffic for a fee. See, e.g., <https://www.peopleperhour.com/services/vcpost?ref=search>.

venture capital investing,”³⁹ and BBNCommunity.com,⁴⁰ a website for the “Buddhist Broadcasting Network.”⁴¹ The articles on these sites contained no disclaimer that the posted content was the product of a reputation management firm.

Status Labs also published articles on platforms designed specifically to host content meant to game search algorithms. The Principal Post, one such website, provides an example of this practice. That site describes itself as “not a traditional newspaper or magazine” and “not meant to be read through by a general audience.” Its purpose is instead to “publish and archive authoritative content that will be readily found from an online search for your name.”⁴² Articles about Haynes and his team appeared on the Principal Post.⁴³ Other, similar websites on which Status Labs published stories about Haynes and the RIOC executive team include beforeitsnews.com⁴⁴ and EIN Presswire.⁴⁵

Status Labs published on these disparate and esoteric websites to bury the negative press Haynes and his team received from local blogs. As described in its Progress Reports to Jamal, Status Labs acted with “the purpose of generating additional backlinks that point back to the focus links that [Status Labs will] be promoting in Google search,” thereby promoting Status Labs’s desired content at the expense of the undesired content—specifically stories about RIOC written by local bloggers.

³⁹ *About Venture Capital Post*, <https://www.vcpost.com/about-us>.

⁴⁰ *Shelton Haynes, RIOC, Welcome OMNY to Roosevelt Island Tramway*, BBN Community, Sept. 20, 2023 (<https://www.bbncommunity.com/shelton-haynes-rioc-welcome-omny-to-roosevelt-island-tramway/>). Freelance writers also advertise writing articles on BBN community for a fee. *See, e.g.*,

www.peopleperhour.com/hourlie/publish-guest-post-on-bbncommunity-bbncommunity-com-da-44-dr-45/663018

⁴¹ *See*, <https://lk.linkedin.com/in/bbncommunity>. Additional platforms irrelevant to RIOC’s work used by Status Labs to publish articles about Haynes include ceoworld.biz and goodmenproject.com. These are described as “the world’s leading business magazine catering to influential business executives who collectively control trillions in annual world-wide spending” and a “a space for a much-needed cultural conversation about manhood,” respectively.

⁴² <https://www.principalpost.com/>.

⁴³ *See*, Principal Post, *Gretchen Robinson*, Jan. 30, 2023 (<https://www.principalpost.com/in-brief/gretchen-robinson-rioc>).

⁴⁴ *See*, *RIOC’s CEO Shelton Haynes and His Team Upgrade Roosevelt Island’s Youth Center*, Before It’s News, Mar. 14, 2023 (<https://beforeitsnews.com/business/2023/03/riocs-ceo-shelton-haynes-and-his-team-upgrade-roosevelt-islands-youth-center-3681708.html>). “Before It’s News” advertises itself as a website that will “publish almost any story by almost anybody” and highlights how useful publishing on the site is for getting attention on search engines. *See*, <https://beforeitsnews.com/v3/faq/>.

⁴⁵ *See*, *Shelton Haynes and Akeem Jamal are Bringing Pickleball to Roosevelt Island in 2023*, EIN Newswires, Jan. 31, 2023 (https://www.einnews.com/pr_news/611832626/shelton-haynes-and-akeem-jamal-are-bringing-pickleball-to-roosevelt-island-in-2023). EIN Newswires is a site that distributes press releases for a fee and advertises itself as a site where one can “[a]ttain long-term visibility in search engines & SEO benefits.” *See*, <https://www.einpresswire.com/?promo=4700>.

Alternative Techniques Proposed by Status Labs

Status Labs and RIOC also discussed other methods to accomplish contract goals besides SEO and reputation management. For example, one communication from Status Labs to Jamal indicated that the firm was going to “move forward on building Shelton Haynes a website.”⁴⁶ Additionally, Status Labs and RIOC discussed entering into an “earned media campaign” with Status Labs’s “strategic communications sister company,” Sensei Advisory (Sensei). Under a proposed statement of work sent to RIOC, Sensei offered to help RIOC develop media strategies and interview talking points with the goal of coverage in major media outlets such as the New York Times and New York Post. The statement of work also described the proposed campaign as being “on behalf of RIOC and Mr. Haynes” and described one “key objective” as being to “[p]romote the leadership and victories of RIOC, and Mr. Haynes, in particular.” RIOC never entered into any formal contract with Sensei.

The Contract’s Conclusion

In August 2023, as the year term of the Status Labs contract neared its end, the firm raised the possibility of extending the contract. In a memorandum dated August 3, 2023, Status Labs indicated that it had been mostly successful in its campaign “to help combat the negative effects of disparaging blogs being published to rooseveltislanddaily.news.” The memorandum highlighted that “[t]hese blog posts target Shelton Haynes, the CEO and President of RIOC, and other members of the RIOC Executive Team, calling into question their character, their track record, and their integrity.” However, Status Labs indicated that because “[t]his antagonistic blogger is himself sophisticated and employs his own best practices to solidify and strengthen his negative articles,” it was “critical” that the contract be extended beyond its one-year term. The memo concluded with the following language:

Status Labs and RIOC are in agreement that an extension of the contracted term is not only beneficial but vital to ensure the long-term success of a campaign that has made such a positive impact on Mr. Haynes’ and RIOC’s online reputations to this point.

Jamal evidently reviewed this memorandum and provided edits,⁴⁷ which Status Labs summarized in an email dated August 9, 2023:

⁴⁶ The Inspector General was unable to confirm whether this website ever materialized.

⁴⁷ The Inspector General does not possess any of Jamal’s original edits.

I wanted to clarify and make sure that I have all of the edits specified for making revisions to the Memo mentioned below. Please specify & provide any additional edits that you'd like us to make.

- Provide statistics and analytics that make sense in order to help prove the point that these bloggers are targeting Shelton and RIOC as a way to provide more insight in the reason for Status Labs continued support.
- Replace mentions of Shelton with mentions of RIOC
- Include specifics about David Stone and Rick O'Connor and the two blogs:
 - Roosevelt Islander
 - Roosevelt Island Daily News

Status Labs subsequently provided two further drafts that implemented these edits. Similarly, in a November 2023 “Month 12 Reputation Management Update,” Status Labs again highlighted its commitment “to doing everything we can to clear Mr. Haynes’ search results.”

Ultimately, RIOC did not extend the Status Labs contract, which was allowed to expire at the conclusion of the contract term. Jamal’s tenure at RIOC ended in November 2023.⁴⁸ Sharpe left RIOC in early 2024. Haynes’s and Robinson’s employment at RIOC concluded on November 25, 2024. Haynes and Robinson are currently involved in litigation against RIOC.

THE INSPECTOR GENERAL’S DETERMINATIONS

The Inspector General’s investigation determined that Haynes and his executive team used the Status Labs contract as a mechanism for the management of their own reputations—not that of the agency they represented. This conduct reflected an appearance of impropriety that may implicate the New York Public Officers Law Code of Ethics. Moreover, the Inspector General found that even if the contract had been implemented in such a way as to focus on suppressing negative content about RIOC itself, such use of public funds would have been inappropriate and contrary to public policy.

The Status Labs Contract was a Misuse of Public Funds for Individual Gain

The Inspector General’s review determined that Status Labs was hired chiefly to conduct reputation management for Haynes and certain members of his executive team, including Robinson, Sharpe, and Jamal. Status Labs measured its success by analyzing search results for “Shelton Haynes,” “Gretchen Robinson,” “Tajuna Sharpe,” and “Akeem Jamal.” Status Labs did

⁴⁸ As part of this investigation, the Inspector General extended Jamal an opportunity to meet and discuss the Status Labs contract. Jamal declined the invitation.

not measure success based on searches of these names combined with the term “RIOC”—rather, the contract’s success hinged on whether searching for the individual names of RIOC’s executive team members on Google delivered positive results. During the contract term, Jamal and the firm also discussed building a website specifically for Haynes himself—not for RIOC. The proposed “earned media campaign” similarly reflected the clear goal of amplifying Haynes’s public standing, not that of the agency he represented.

Further exemplifying how the Status Labs contract was actually meant to bolster the public-facing online presence of RIOC’s executive team, the Inspector General’s investigation also found that Haynes’s fixation with local blogs was a driving force in RIOC’s procurement of a reputation management firm. Language about “several published articles full of disinformation” that needed to be corrected can be found in initial drafts of the RFP. While this language was removed in the final RFP, Status Labs’s progress reports show that the very baseline measurement of whether Status Labs was succeeding in its purported mission was the search engine performance of local blogs. Status Labs also constantly referred to the blogs in communications with Jamal and even edited its memo seeking a contract extension to be more explicit in discussing the bloggers by name.

Additionally, while Status Labs did indicate that it was involved in “curation” and “branding” for RIOC as a whole, it is clear that any work done for the agency itself was secondary to the work done for the executive team individually. For example, during the contract term, Haynes and Jamal explored the ability to remove links from Google altogether, an act inconsistent with a campaign meant to simply improve RIOC’s online branding. Similarly, communications between Jamal and Status Labs consistently focused on specific members of the executive team, not on RIOC. Moreover, OGS has a centralized contract for “media buying services” that RIOC could have used had the corporation been truly seeking a contract for improved branding. Haynes and his team were aware of this contract and considered using it before ultimately turning to the RFP process. It is noteworthy that the OGS centralized contract lacks any terms regarding artificial reputation management services.

In sum, Haynes and certain members of the RIOC executive team used Status Labs to curate and launder their own online image as public-facing figures. This was done at least in part through an active campaign to suppress the appearance of critical local blog posts in web searches. The results produced when searching online for the individual names of RIOC’s executive team are irrelevant to RIOC’s work managing Roosevelt Island. Despite this, RIOC

spent nearly \$170,000 of public money to help curate results found when searching for the names Shelton Haynes, Akeem Jamal, Gretchen Robinson, and Tajuna Sharpe online. This is an inappropriate use of state funds.

The Assignment of the Contract Manager was Inappropriate

The Inspector General also determined that the contract's management by Jamal was inappropriate and counter to the intent in the contract to avoid decision-making by RIOC employees with a personal interest in the contract's execution. As described above, the Status Labs contract provided a mechanism for Haynes and the executive team to attempt to control online narratives about themselves at the state's expense. Jamal—a person written about extensively by local blogs before and after the Status Labs procurement—was responsible for managing the contract in his capacity as AVP of communications and public affairs. As a subject of multiple blog articles, Jamal had a vested interest in the suppression of any articles written about himself. Jamal's management, then, created an appearance of impropriety, as contemplated by the New York Public Officers Law Code of Ethics.

Moreover, while Jamal clearly had a personal interest in suppressing negative links about himself, the other members of the RIOC executive team did as well. Though Haynes, Robinson, and Sharpe were not tasked with managing the contract, they were involved in reviewing draft articles about themselves and participating in interviews with Status Labs's staffers creating content for the contract. This participation in the contract similarly runs counter to its provisions seeking to avoid decision-making by interested RIOC employees and similarly may implicate the New York Public Officers Law Code of Ethics.

Had the Status Labs contract constituted an acceptable usage of state funds—which, as described above, it did not—the participation of RIOC's executive team in its execution, and especially Jamal's management of it, created an unacceptable appearance of impropriety.

Artificial Reputation Management by Government Actors is Inconsistent with Public Policy

Finally, the Inspector General determined that even if the Status Labs contract was meant to suppress negative links for the benefit of RIOC instead of for the benefit of Haynes, Robinson, Sharpe, and Jamal, it would still be an inappropriate use of state funds. As made clear by multiple New York laws and regulations, a paramount goal of New York State government is transparency and openness with the public. For example, New York's Freedom of Information Law provides in pertinent part that “[t]he more open a government is with its citizenry, the

greater the understanding and participation of the public in government” and that “it is incumbent upon the state and its localities to extend public accountability wherever and whenever feasible.”⁴⁹ Related to this goal is the understanding that the public, including local blogs, has the ability to be heard consistent with the law. A system by which the state or one of its agencies actively works to bury or hide commentary—such as the one employed by members of RIOC’s executive staff—is counter to these goals.

To be sure, state agencies can and should endeavor to be easily found online. Boosting a state entity’s internet profile is wholly consistent with transparency goals—when the public can more easily find information about state government, it can more easily participate in state government. At issue here, though, is not simply a situation in which RIOC tried to boost its online image through organic means such as social media awareness campaigns, press releases, or public interviews. Instead, RIOC paid to flood the internet with puff pieces to artificially manipulate web search results to explicitly drown out blogs written about RIOC. When the goal of agency action is to suppress speech made by the public, that action is inappropriate and the state or one of its agencies should not contract with third parties—at high cost—to effectively undermine its constituents’ ability to be heard. Accordingly, RIOC’s contracting with Status Labs to help suppress negative online content, regardless of whose benefit the contract inured to, was contrary to important government goals.

CONCLUSION

Haynes and the executive team at RIOC inappropriately contracted with a firm to manipulate search engine results to suppress negative local press. This act was not consistent with RIOC’s purpose and was a misuse of state funds. The use of state resources in the suppression of negative articles about Haynes and other members of RIOC’s executive staff was also self-serving and may implicate the New York Public Officers Law Code of Ethics. However, because Haynes, Robinson, Sharpe, and Jamal are no longer employed with RIOC, and because the Status Labs contract was not renewed, there is no immediate danger of continued misuse of state resources on this contract. The Inspector General, however, notes that the very premise of a state agency manipulating search engine results to bury negative press is itself against good open government policy. RIOC and all New York State agencies are

⁴⁹ New York Public Officers Law Art. 6, § 84.

reminded to be mindful in how to respond to negative commentary in the public, as the answer cannot be to use state resources to attempt to silence critics.

For the reasons detailed above, the Inspector General is providing a copy of this report to the New York State Commission on Ethics and Lobbying in Government for its review and consideration.