



## Conflicts of Interest Heads-Up for DOB Employees

Conflicts of Interest between your official duties and your private financial or political interests, or those of someone who is “associated” with you (like a close relative), can damage your reputation as a public servant, taint the official actions you take, and may even lead to prosecution. The Conflicts of Interest Board (COIB) administers, enforces, and interprets the Conflicts of Interest Law which covers all New York City public servants, including those that work at DOB.

Conflicts of interest are a reasonable expectation for anyone in government service. Some are obvious. Some are less so. While you are not expected to be an expert on the Conflicts of Interest Law, you are expected to know when you face a potential conflict of interest and address it before it becomes a problem. The COIB is always available to confidentially answer any question you have regarding a potential conflict of interest. Call anytime between 9am-5pm, Monday through Friday, to speak to an attorney in the COIB Legal Advice Unit. The telephone number is 212-442-1400.

*Below are a few typical conflicts of interest issues that come up for DOB employees. You will see some basic restrictions, but if these provoke any further questions, please reach out to COIB for more information.*



### ***OUTSIDE JOBS—***

Like a lot of City agencies, DOB **requires** that you seek permission from DOB for **any** sort of outside employment. And that really does mean **anything**, whether it’s outside work teaching a course at NY College of Technology, wrapping presents at MACY’s, or tending bar on the weekends. Any outside employment must be disclosed to DOB. The person to contact is Jeanine Gaylard at Legal. Many people at DOB have successfully obtained permission for outside work of various sorts, although permission to work privately in the trades is very unlikely. Additionally, DOB may grant you permission, but refer you to COIB for an official **waiver** for your outside job. This is because of certain requirements of the Conflicts of Interest law. DOB will explain more, should you encounter this particular situation.

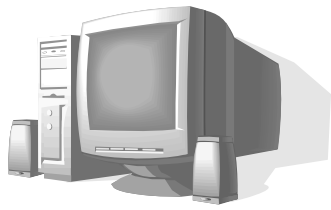
*So you got permission (maybe even a waiver form COIB, if you needed one), but remember: **no City time and resources.***

(One of the conditions of the permission you get from DOB will **always** be that you do not use DOB time, resources, personnel, contacts, tools, or anything else at DOB to pursue that outside work.)

## ***GIFTS—***



Whatever your position at DOB, remember that the gift policy is \$0, when talking about what you can accept from someone doing business with DOB. Whether you're an inspector working on a site, a person working at the window in a borough office and dealing all day with expeditors, or a contract officer working with vendors, no gifts are allowed. Check the DOB employee code of conduct for more info. Also remember: if someone offers you something to look the other way, or otherwise alter your professional work, it's not a gift, it's a bribe, and **MUST** be reported to DOI.



## ***DOB RESOURCES—***

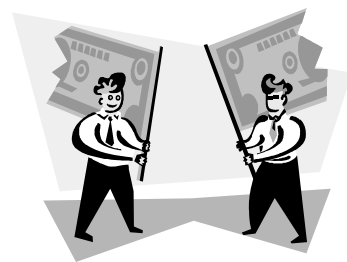
DOB time, computers, cars, equipment, and the like are to be used to DOB purposes only. A minimal amount of time, office technology, supplies, etc. might be allowed for some kinds of personal use. See the DOB Code of Conduct for more information about this. However, **no** amount of DOB time or resources may **ever** be used for an outside business, job, or political campaign.

## ***POST-DOB EMPLOYMENT—***

When looking for a job while still working at DOB, remember that you can't seek employment with any private entity that you personally deal with in your DOB capacity. So, for example, if there is an expeditor you deal with every day, you couldn't seek employment with that expeditor unless you **recused** yourself from having anything to do with the expeditor in your DOB job.

*After You Leave*—you are prohibited from **appearing** (in person, at meetings, on the telephone, in writing) before DOB for **one** year after leaving City service. You **could** appear before other agencies, however.

*Particular Matter Bar*—if you worked on a particular project substantially, you are barred from working on that project **forever** once you leave government. This restriction is pretty narrowly interpreted, so call COIB to see how it might or might not affect you.



## ***COMMERCIAL ACTIVITY IN THE WORKPLACE—***

DOB has a ban on any commercial activity on DOB premises. Employees should not buy/sell goods and services to each other, nor should they organize savings clubs or lotto pools in DOB buildings, or on DOB time.

Additionally, **any** financial relationship between any superior and subordinate is prohibited under the Conflicts of Interest Law, whether it happens in a City building during work hours, or it happens in a bar on the weekends. Superiors and subordinates cannot lend/borrow money to/from each other, go into business together, buy/sell goods & services to or from each other, or anything else.

## ***AT THE WINDOW—***

Be careful of people with DOB matters attempting to offer gifts or tips to you. As stated above, all gifts and tips are prohibited. Also remember that DOB information is confidential and must remain so. It's illegal to reveal confidential DOB info to **anyone** who's not supposed to know it.



## ***RELATIVES—***

If there is some DOB-related process that involves a relative of yours, or someone with whom you have a financial relationship, chances are you will need to disclose the situation to your boss and have your boss officially **recuse** you from having any involvement with that DOB-related matter. For example, if you were a DOB inspector and were assigned to inspect your sister's building, you would disclose this potential conflict to your boss and s/he would reassign those duties to someone else. Similarly, if your spouse is a contractor or an expeditor, you would want to disclose that potential conflict of interest to your boss in order to ensure that someone else could always handle your spouse's DOB-related matters.

### *Can your relatives apply for jobs at DOB?*

Yes, they apply like everyone else AND you disclose this potential conflict and recuse yourself from any involvement in your relative's application process: no references, no questions, no recommendations.

### *What if my spouse owns a construction business?*

If you or your spouse owns a business that has any business dealings with **any** City agency, you must disclose this business to COIB. This would include a construction business that deals with DOB.

***FOR ADDITIONAL INFORMATION, CONTACT  
NEW YORK CITY CONFLICTS OF INTEREST BOARD  
2 LAFAYETTE STREET, SUITE 1010  
NEW YORK, NY 10007  
212-442-1400 (TDD 212-442-1443)  
<http://nyc.gov/ethics>***

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