



New York City Conflicts of Interest Board 2024 Annual Report

2 Lafayette St, Suite 1010
New York, NY 10007

212-442-1400

nyc.gov/ethics



@NYCCOIB

Current Board Members

Milton L. Williams Jr.	Partner at Walden Macht Haran & Williams LLP. Appointed to the Board as Chair in September 2022.
Wayne G. Hawley	Former Deputy Executive Director and General Counsel, NYC Conflicts of Interest Board. Appointed to the Board in April 2020.
Ifeoma Ike	Founder and CEO of Pink Cornrows. Appointed to the Board in April 2022.
Amy E. Millard	Of Counsel at Clayman Rosenberg Kirshner & Linder LLP. Appointed to the Board in April 2024.
Georgia M. Pestana	Former Corporation Counsel of the City of New York. Appointed to the Board in April 2022.

Former Board Members

Merrell E. Clark Jr., Chair	January 1989 – September 1990
Sheldon Oliensis, Chair	September 1990 – February 1998
Benito Romano, Acting Chair	March 1998 – June 2002
Steven Rosenfeld, Chair	June 2002 – December 2012
Nicholas Scoppetta, Chair	January 2013 – February 2014
Richard Briffault, Chair	March 2014 – March 2020
Jeffrey D. Friedlander, Chair	April 2020 – March 2022
Fernando A. Bohorquez Jr., Acting Chair	April 2022 – September 2022
Beryl R. Jones	October 1989 – May 1995
Robert J. McGuire	October 1989 – September 1995
Benjamin Gim	September 1990 – September 1994
Shirley Adelson Siegel	September 1990 – April 1998
Benito Romano	September 1994 – 2004
Jane Parver	September 1994 – September 2006
Bruce A. Green	November 1995 – March 2004
Angela Mariana Freyre	October 2002 – May 2011
Monica Blum	August 2004 – March 2013
Andrew Irving	April 2005 – March 2017
Kevin B. Frawley	October 2006 – July 2009
Burton Lehman	July 2009 – March 2014
Erika Thomas	March 2012 – March 2020
Anthony W. Crowell	April 2013 – November 2021
Jeffrey D. Friedlander	April 2017 – March 2022
Nisha Agarwal	April 2020 – March 2022
Fernando A. Bohorquez Jr.	April 2014 – March 2024

Board Staff

Executive

Carolyn Lisa Miller
Executive Director

Administration

Tasnia Karim
Director

Caitlyn Louie
Deputy Director

Annual Disclosure

Katherine J. Miller
Director & Special Counsel
EEO Officer & Disability Rights
Coordinator

Holli R. Hellman
Senior Annual Disclosure
Analyst

Dawnn Anderson
Annual Disclosure Analyst

Jasmine Mack
Annual Disclosure Analyst &
Legal Coordinator

Veronica Martinez Garcia
Administrative Assistant

Education & Engagement

Alex Kipp
Director

Rob Casimir
Senior Education &
Engagement Specialist

Gavin Kendall
Education & Engagement
Specialist

Roy Koshy
Education & Engagement
Specialist

Enforcement

Jeffrey Tremblay
Director

Katherine J. Weall
Deputy Director

Anita Armstrong
Associate Counsel

Vacant
Assistant Counsel

Information Technology

Derick Yu
Director

Legal Advice

Ethan A. Carrier
General Counsel

Christopher M. Hammer
Deputy General Counsel

Maryann White
Associate Counsel

Yasong Niu
Assistant Counsel

Vacant
Assistant Counsel

Florence Watson
Paralegal

Introduction

The New York City Conflicts of Interest Board (“COIB” or “the Board”) has four broad responsibilities:

1. Educating the approximately 325,000 current public servants of the City of New York about the requirements of Chapter 68, the City’s Conflicts of Interest Law;
2. Interpreting Chapter 68, the Lobbyist Gift Law,¹ the Affiliated Not-for-Profits Law,² and the Legal Defense Trust Law,³ through issuing waivers, promulgating rules, and responding to requests for advice, both formal and informal, from current and former public servants, lobbyists, and affiliated not-for-profits;
3. Prosecuting violations of Chapter 68, the Lobbyist Gift Law, the Affiliated Not-for-Profits Law, and the Legal Defense Trust Law in administrative proceedings; and
4. Administering and enforcing the City's Annual Disclosure Law.⁴

This Annual Report reviews the Board's accomplishments during 2024, under each of the following headings: (1) Legal Advice; (2) Enforcement; (3) Education & Engagement; and (4) Annual Disclosure.

¹ [Subchapter 3 of Title 2 of the New York City Administrative Code.](#)

² [Chapter 9 of Title 3 of the New York City Administrative Code.](#)

³ [Chapter 11 of Title 3 of the New York City Administrative Code.](#)

⁴ [Section 12-110 of the New York City Administrative Code.](#)

Legal Advice

Call us. Write us. Ask us. This has been the Board's mantra for 35 years, because the Board would always prefer to prevent a conflict of interest before it occurs. So, when someone needs guidance regarding their compliance with the City's Conflicts of Interest Law, the Lobbyist Gift Law, the Affiliated Not-for-Profits Law, or the Legal Defense Trust Law, it is both the mission and the legal obligation of the Board to ensure they get that advice. The Board's Legal Advice Unit is primarily responsible for administering the Board's advice-giving function, and there is a lot that goes into making this work successful.

Public servants should not hesitate to ask a question because they worry the process might be slow, bureaucratic, or unreliable. To that end, the Legal Advice Unit operates the Attorney-of-the-Day service – a hotline where in 2024 staff attorneys provided fast (almost always the same day) and accurate responses to 3,595 emails or calls from public servants seeking assistance. Public servants also should not fear, when they ask about the application of the conflicts of interest law to their personal finances or close family members, that this sensitive information will ever become public. The advice provided by the Legal Advice Unit is confidential. If the question is a bit more complicated, or if the public servant wants or needs a more formal response, Legal Advice Unit attorneys also provide Staff Advice Letters, explaining the application of the conflicts of interest law to their question in greater depth (19 in 2024).

There are, of course, complex, novel, or sensitive questions that require the insight of and decision by the full five-member Conflicts of Interest Board. For these questions, the Legal Advice Unit gathers information, performs legal analysis, and provides recommendations so that the Board is best positioned to consider these difficult matters at its monthly meetings and provide Board Advice Letters to the requesting public servants (11 in 2024). Chapter 68 of the City Charter requires that this formal Board advice or "advisory opinion" be "made public with such deletions as may be necessary to prevent disclosure of the identity of any public servant or other involved party." Charter Section 2603(c)(3). In practice, the advice provided by the Board is so specific to the particular facts of the public servant, such as their City position and City duties, as well as the details of their relevant private interest, such as personal financial or familial circumstances, or the precise circumstances of another involved party, that it is not possible to make the confidential advice public, as the legally required deletions would render the document meaningless. To reveal the identity of the public servant or other involved party is not only prohibited by the City Charter but would cause a chilling effect on public servants seeking advice, undermining the Board's core purpose of preventing conflicts of interest.

Not infrequently, a public servant wishes to engage in conduct that would technically violate the conflicts of interest law but would not actually conflict with the purposes and interest of the City. In such circumstances, the head of that public servant's City agency may request that the Board grant a waiver (for a position or conduct) or an order (for ownership interests) to permit that public servant to engage in the otherwise prohibited conduct. The Board has delegated to the Chair the authority to grant routine waivers and orders (700 granted in 2024), such as many of the requests for waivers for public servants to hold second jobs (also known as "moonlighting waivers").

Requests for waivers or orders that are complex, novel, or sensitive are reviewed by the full five-member Board (13 granted in 2024). Because they involve the Board granting an exception to the prohibitions in the conflicts of interest law, the City Charter requires that all waivers and orders are public documents.

Ethics Liaison Training

The Legal Advice Unit continued its work teaching City attorneys through the Board's "Friday Fifteen" program, a weekly live video conference training program. This program covers both the nuts and bolts of the Conflicts of Interest Law and best practices for handling Chapter 68 matters, for 15 minutes every Friday morning throughout the year.

Rulemaking

The Legal Advice Unit continued its work supporting the Board's rulemaking agenda. In 2024, the Board engaged in two rulemaking efforts, holding two open meetings and one public hearing:

- The Board completed amendments to Board Rules Chapter 2, the Board's enforcement procedures. The changes relate to the applicability of Chapter 2 to the Annual Disclosure Law, the order of closing statements, page limits for written statements, *ex parte* communications, garnishment of City wages to collect penalties, and various minor clarifying edits.
- The Board also completed amendments to Board Rules § 1-02, which defines those public servants who are "charged with substantial policy discretion" ("policymakers") and establishes related requirements for reporting and notification. These amendments include: (1) changing the reporting date by which City agencies must submit their policymakers lists to the Board; (2) making that reporting semi-annual rather than annual; (3) codifying the Board's current practice of directly notifying policymakers that their agencies have designated them and of their additional restrictions rather than requiring City agencies to do so; (4) establishing a procedure for agencies to dispute a Board determination to add or

remove a policymaker from the agency’s list, and (5) requiring that agencies submit their latest organizational charts to the Board to aid Board Staff in making individualized assessments concerning an agency’s designations. These amendments were implemented in the August 2024 reports.

Legal Defense Trust Law

With two legal defense trusts operating in 2024, a considerable number of staff hours were dedicated to administering the reporting requirements of this law. A significant portion of this time was spent solving (or working around) problems arising from the limitations of the electronic reporting system the Board was able to procure within its limited budget when the City Council entrusted the Board with the responsibility of administering this law but allocated no resources for doing so. These challenges were exacerbated by cuts to the Board’s budget that prevented the Board from filling ongoing staff vacancies.

By the Numbers:

	2019	2020	2021	2022	2023	2024
Board Waivers and Ownership Interest Orders	8	50	33	32	31	13
Chair Waivers and Ownership Interest Orders (Charter §§ 2604(a)(4) and 2604(e))*	649	395	330	580	814	679
Chair Waivers (Board Rules §§ 1-13(c) and 1-13(e)(2))	17	4	10	7	13	21
Board Advice Letters	13	6	12	12	6	11
Staff Advice Letters	55	15	17	35	11	19
Attorney-of-the-Day Advice	4,871	3,398	3,323	3,939	4,075	3,595
Cases Pending at Year End	105	88	92	119	107	71
Median Days from Request to Chair Waiver and/or Ownership Interest Order	57	53	60	41	28	35

* A “waiver” is a letter in which, with the written approval of the relevant agency head, the Board authorizes a current or former public servant to engage in conduct that would otherwise violate Chapter 68; most waivers are for second jobs with firms doing business with the City, known as “moonlighting waivers.” Charter Section 2604(e). An “order” is similar to a waiver, but is for a public servant’s ownership interest in a firm. Charter § 2604(a)(4). A Board Rules Section 1-13(c) waiver is specific to permitting a public servant to use a small amount of City time or City resources (but not City letterhead or email) for certain charitable volunteer work, such as providing *pro bono* legal services. A Board Rules Section 1-13(e) waiver is specific to permitting a public servant to perform work for a City not-for-profit as part of their City duties, such as when an agency head serves on the board of a not-for-profit affiliated with their City agency.

Enforcement

The Enforcement Unit, a unit of only four when fully staffed, has been functioning without a junior Enforcement attorney since August 2023. The Board sought, but did not receive, budget authorization to fill this vacancy. The result of this funding decision has been the reduction for all of 2024 in the Unit's staff by 25%, straining the Unit's remaining staff.

The shorthanded Enforcement Unit dealt with a significantly increased workload, as the number of complaints received in 2024 returned to pre-pandemic levels. Despite the ongoing staffing challenge, the Enforcement Unit persevered to ensure that current and former public servants who violate the conflicts of interest law are held accountable for their misconduct. In 2024, the Board made 46 public findings of violations, the most since 2020. The Board also collected \$189,346 in fines in 2024, the highest yearly total since 2019.

By the Numbers:

	2019	2020	2021	2022	2023	2024
Complaints Received	361	203	256	287	288	361
DOI/SCI Reports Received	145	107	105	84	77	72
Public Findings of Violations*	86	55	38	42	40	46
Fines Collected	\$227,550	\$67,450	\$59,825	\$94,750	\$79,700	\$189,346
Fines Imposed	\$233,050	\$90,750	\$76,075	\$88,725	\$302,350	\$222,446

* Public findings of violations include settlements in which respondents agree to pay fines to the Board, Board Orders imposing fines after hearings, and public warning letters issued to respondents with no accompanying fine.

Notable Cases:

In 2024, the Enforcement Unit addressed several serious violations of the conflicts of interest law. In some of these cases, public servants used their City status to benefit themselves or their close family members. In others, public servants used substantial amounts of City time—time when they are being paid by the City to perform their City jobs—and/or City resources to perform private work. Through their violations, these public servants put their private interests ahead of their duty to the City. The Board held these public servants accountable for their violations through substantial monetary

fines.

- [Health + Hospitals Senior Vice President \(“SVP”\) Pays \\$25,000 Fine for Awarding Business to Husband’s Company and Eating at Expensive Restaurants on City’s Dime](#)

The SVP for Business Operations and Pharmacy at New York City Health + Hospitals caused Health + Hospitals to purchase \$98,000 in consulting services and ventilators from a company where her husband worked as a Senior Vice President. Under the conflicts of interest law, a public servant cannot be involved in the purchase of goods or services that would benefit themselves or their associates, even if the items purchased are needed by the City.

The SVP also used her agency-issued purchasing card, or P-Card, which she was given for emergency use during the COVID-19 pandemic, to spend a total of \$7,261.98 for food and alcohol at sit-down meals, largely at expensive restaurants including Cut by Wolfgang Puck and Quality Italian, at a time when indoor dining was limited due to the pandemic.

The SVP also used her agency P-Card to spend \$872.33 on the food delivery service Seamless and to make a \$2,500 “donation” to her alma mater, St. John’s University, to secure her placement on the St. John’s University College of Pharmacy and Health Sciences Dean’s Advisory Board.

For these violations, the SVP agreed to pay a \$25,000 fine (COIB Case No. 2023-205).

- [Principal at the New York City Department of Education \(“DOE”\) Pays \\$22,500 Fine for Awarding Business to Son’s Company](#)

A DOE Principal directed payments totaling \$50,815 to her son’s company to provide numerous services and products to her school, including murals, business cards, banners, and parent workshops. There were several incongruities in the invoices submitted by the son, including that he invoiced for five workshops he claimed to have conducted on the same day, only two of which were advertised, and the attendee lists for two of those workshops were identical. By directing these payments to her son’s company, the Principal misused her City position to benefit her son.

The now-former Principal agreed to pay a \$22,500 fine to resolve these violations (COIB Case No. 2022-729).

- DOE Payroll Secretary Pays \$10,000 Fine for Helping Son Get Paid for Unauthorized Substitute Teaching Assignment

A DOE Payroll Secretary's son was hired by her school's Principal to work a two-week stint as a substitute Paraprofessional at her school. As Payroll Secretary, she processed her son's assignment in DOE's SubCentral system so that he could get paid. After the two-week stint ended, the Payroll Secretary twice re-assigned her son to her school in SubCentral, making him eligible to be paid for an additional six months of work that had not been authorized by the Principal. She also entered her son's work hours into the DOE payroll system, including hours for 55 days that her son did not actually work. Through her conduct, the Payroll Secretary used her City position to benefit her son.

In a three-way settlement with the Board and DOE, the Payroll Secretary agreed to pay a \$10,000 fine to the Board (COIB Case No. 2023-514).

- Probation Officer Pays \$7,250 Fine for, Among Other Things, Using More than 200 Hours of City Time for Private Work as Social Work Consultant

A Probation Officer at the New York City Department of Probation ("DOP") had a second job as a Social Work Consultant performing court-appointed work. The Probation Officer performed more than 200 hours of this outside work at times she was required to be working for DOP, thus misusing a significant amount of City time. The Probation Officer also stored 87 documents on her DOP computer and used a DOP printer to scan documents related to her outside work, thus misusing City resources.

Finally, on behalf of her court-appointed clients, the Probation Officer communicated with employees of the New York City Administration for Children's Services, the New York City Department of Education, and the New York City Police Department on more than 200 occasions. The City's conflicts of interest law prohibits a public servant from communicating with any City agency as part of an outside job.

To resolve these violations, the now-former Probation Officer paid a \$7,250 fine to the Board (COIB Case No. 2023-384).

- Project Manager at New York City Department of Housing Preservation & Development ("HPD") is Fined \$6,500 for Storing More than 1,000 Documents for His Ticket-Selling Business on his HPD Computer.

An HPD Project Manager had a private business selling event tickets and related

services. From 2013 to 2019, the Project Manager stored 1,030 files related to this business on his HPD computer and used his HPD email account to send and receive 27 emails related to the business, thus misusing City resources.

After a full hearing at the New York City Office of Administrative Trials and Hearings, the Board imposed a fine of \$6,500 on the now-former Project Manager (COIB Case No. 2019-732).

Education & Engagement

Conflicts of Interest can happen at any level of City government. While not a daily occurrence for most, encountering a potential conflict of interest should be seen as a normal part of public service. Problems occur when the conflict is not addressed in compliance with the law. It is the work of the Board's Education and Engagement Unit to arm every public servant with enough awareness to know when they need advice and to help them see the Board as the trusted partner who can advise them.

The Unit's work breaks down into two basic categories: *"Meet Them Where They Are,"* and *"Stay in Their Heads"*.

Under the conflicts of interest law, all public servants are required to receive training once every two years. These mandatory training sessions comprise the *"Meet Them Where They Are"* category, where the four members of the Education & Engagement Unit reach public servants by making the law come alive with relevant examples and discussion, with delivery methods that are minimally disruptive to their work. Training is delivered in one of three ways: in-person Instructor-Led-Training (ILT) (147 conducted in 2024); virtual ILT conducted *via* webinar (217 conducted in 2024); and eLearning with a course created by the Education & Engagement Unit and hosted by CityLearn, the Citywide eLearning portal maintained by the Department of Administrative Services (DCAS).

eLearning's strength lies in its ability to potentially reach any public servant with access to a computer. In 2024, over 19,000 public servants received Conflicts of Interest Law training with this tool. eLearning, however, is less impressive when it comes to making the law come alive, as the system cannot adjust to the concerns or daily practices of the individual trainee.

Virtual and in-person sessions led by the Unit's creative training team do a much better job of engaging audiences. For every agency, sometimes even for individual groups within agencies, the Unit creates bespoke training content that uses enforcement examples and advice questions that are typical for that audience. The trainers employ hypotheticals and cases that make the law feel relevant and humor to make the content memorable.

To maximize its impact, the Unit will go any place at any time. This allows agencies to book Conflicts of Interest Law training as a part of existing training initiatives where

groups of employees have already been targeted. In a given week, a professional educator of the Unit might find themselves leading an in-person meeting with 150 new Sanitation Workers at 7 a.m. at Floyd Bennet Field, an 11 a.m. virtual training for 40 new employees of the Administration for Children's Services, a 1 p.m. in-person session for the "Commissioner's All-In" for 800 of the highest-ranking Executives of the Police Department at the NYPD Academy, a 3 p.m. in-person Professional Development session for teachers at a school in the Bronx, and a 7 p.m. briefing for Community Board 1 in Queens. Each session will deploy different examples, different stories, different decks, different jokes, -- to deliver an experience that feels like the trainer is "in their heads," anticipating their questions and concerns and generating authentic discussion. This approach has won many public servant fans who've described the Board's training as "sensational" and "the best part of their workday." Unit staff spend much of their time scheduling these sessions and cultivating relationships with agency training liaisons across the City.

Once the Unit has gotten in public servants' heads by "meeting them where they are," it makes myriad regular attempts to **"Stay in Their Heads"** with micro-messaging across a wide variety of platforms, including monthly publications, video, infographics, and postings on the agency's LinkedIn, Bluesky, and Instagram accounts. All creative assets are produced in house, with Unit members serving as writers, actors, directors, editors, and designers. The Unit creates three unique publications per month with a combination of new original content and assets from the Unit's archives. Devoted fans often respond to the Unit's publications with emails such as, "your newsletters are truly a highlight and make me smile each time I receive them. Thanks for bringing levity along with facts/education to us!" and, "please tell me I can print this edition and share it with friends. I love it!"

A typical month for the Unit will see production of the Board's newsletter, the Ethical Times, featuring an original (many times humorous) article on some aspect of the conflicts of interest law and summaries of recent enforcement cases; the Public Service Puzzler, each month featuring a new original ethics-themed puzzle for public servants to play; and COIB Small Plates, a pairing of multi-media content from the Unit's deep library. Examples from 2024 include a December interview between Santa and an Ethics Auditor; the pitfalls associated with becoming a paid tattooed brand ambassador for businesses that do business with the City; and a variation on the "River Crossing Problem" featuring a City worker, their subordinate, and a \$50 impermissible gift from a member of the public.

Each month, the Unit also typically writes, shoots, and edits short videos on some conflicts-related theme. These videos are deployed on social channels and then are

available to redeploy in training sessions and monthly publications. Examples from 2024 include a short father-son “intervention-style” video about the use of fake City parking placards; a number of installments of “Public Service Ponderings” in the Jack Handey “Deep Thoughts” style; and news-desk-style summaries of enforcement cases.

The Unit also produces bespoke video and print content at the request of City agencies looking to address specific audiences and subjects. In 2024, the Unit produced one such video for deployment across NYPD and another video for the DCAS Citywide New Employee Orientation program. The Unit also created an NYPD-specific one-page Plain Language Guide for members of service.

The Unit’s Director, Alex Kipp, currently serves on the board of directors of the Council on Governmental Ethics Laws (COGEL) and also serves as Co-Chair of its Marketing & Communications Committee. At the COGEL Conference in Los Angeles in December, Mr. Kipp co-hosted a Training & Communications Roundtable, led an Improvisation workshop for COGEL professionals, moderated a Breakfast Table Topics session on COGEL’s year-round programming, and co-hosted several plenary sessions. In 2024, Alex also made a number of videos to support COGEL’s work.

Of particular pride to the Board this year, Mr. Kipp was awarded the Sloan Public Service Award in November of 2024, in recognition of his innovative methods and passion for communicating ethics to New York’s 325,000 public servants. Mr. Kipp is the first Board employee to have received this honor, referred to by some as the “Nobel Prize of New York City Public Service.” In the words of the Award Committee: “His innovative approach has not only raised the bar for ethics training but has also earned him the respect and admiration of colleagues and stakeholders across the board.”

By the Numbers:

	2021	2022	2023	2024
Live Classes Conducted (in person and webinar)	258	249	346	364
People Trained	13,641	14,113	18,306	22,471
Agencies Visited	38	37	55	48
Classes before 9:30 a.m./after 5:30 p.m.				30
eLearning Class Completions	28,256	42,833	33,029	19,812
Agencies Participating in eLearning	53	46	78	49
Social Media Views	1,782,114	1,256,167	490,128	25,256
Videos Created				15
Unique Publications Created				37
Website Page Views	156,000	127,205	172,231	173,122

Annual Disclosure

During 2024, 9,604 individuals were required to file an annual disclosure report with the Board covering calendar year 2023. The majority of those individuals—specifically, City employees and compensated members of policymaking boards or commissions—were required to file online during the annual disclosure filing period from April 8 through May 3, 2024. The Board’s Annual Disclosure Unit worked closely with over 100 agency liaisons to prepare for the filing period, generate unique passwords for each filer, and distribute those passwords to all filers. During 2024, the AD Unit handled nearly 5,000 telephone calls to assist with the filing of reports.

For uncompensated members of policymaking boards and commissions, members of local public authorities, and tax assessors, the AD Unit distributed and collected a PDF fillable 2023 report from each required filer.

	2020 Reports	2021 Reports	2022 Reports	2023 Reports
Reports Filed*	10,306	9,996	10,079	9,601
Filing Compliance Rate	98.6%	98.0%	98.5%	99.9%

* Each year, filers are required to file a report covering the prior calendar year. Thus, during 2024, filers were required to file reports for calendar year 2023.

Filers of 2023 Reports	
City Employees & Compensated Members of Policymaking Boards and Commissions	8,941
Uncompensated Members of Policymaking Boards and Commissions	196
Members of Local Public Authorities	338*
Tax Assessors	128

*Two of these filers also file as members of an uncompensated board or commission.

During 2024, the AD Unit reviewed almost all 2023 reports for completeness and potential conflicts of interest. The AD Unit identified information in over 1,000 filers’ reports that was not accurately reported and contacted those filers to amend their 2023 reports.

Enforcement of Penalties Against Late Filers

For the first time, the Board utilized [Board Rules § 4-07](#) to prosecute filers who filed their reports more than one week after their filing deadline. In accordance with Board Rules § 4-07, each late filer was sent a Late Filer Notice and given an opportunity to pay a fine based on the fine schedule found in Board Rules § 4-07(c) or to submit a written response for the Board's consideration. In 2024, the Board issued 15 public orders imposing fines on late filers after considering their written responses submitted to the Board.

Filers Leaving City Service

City employees who meet the filing criteria on the day they leave City service are required to file a final report within 60 days of their last day performing work for the City. In 2024, the AD Unit assisted almost 300 filers to file a final report covering the part of 2024 during which the filer was working for the City.

Filers who do not file their final report will not receive their last paycheck and/or any lump sum payments to which they are entitled until they file. To verify that a filer has completed that requirement, upon the request of the filer's agency, the AD Unit ensures that the filer has filed their final report and issues a Certification of Compliance.

By The Numbers:

	2021	2022	2023	2024
Reports Reviewed*	10,711**	8,800	9,022	9,302
Filers Advised of Potential Conflicts	131	240	339	185
Late Fines Collected***	\$43,500	\$24,500	\$41,200	\$19,700
Certifications of Compliance Issued for Filers Leaving City Service	755	981	432	475
AD Reports Released	415	399	533	1,340

* The numbers in this row do not include final reports that were reviewed.

** Because the 2020 filing period was delayed due to the COVID-19 pandemic, the review of 2019 reports extended into 2021; 1,938 of the reports reviewed were 2019 reports.

*** The numbers in this row reflect the total amount of fine payments received by the Board during the year.

Candidates for City Elective Office

The City's Annual Disclosure Law requires all candidates for Mayor, Public Advocate, Comptroller, District Attorney, Borough President, and City Council file an annual disclosure report with the Board. In 2024, ahead of the 2025 election cycle, the AD Unit began to prepare for candidates to file using the Board's electronic filing website rather than a PDF fillable form for the first time. To assist candidates with the filing process, the AD Unit created a set of candidate-specific video tutorials available on the Board's website.

In 2024, candidates for the 2025 election cycle who wanted to be eligible to receive a payment of matching funds from the New York City Campaign Finance Board ("CFB") in December 2024 were required to file with the Board a partial disclosure report covering January 1 through September 31, 2024. Sixty-four candidates filed a partial 2024 candidate report. The AD Unit reviewed each of those reports for completeness and reported those findings to CFB; only candidates whose reports were accepted as complete were eligible to receive payment of matching funds from CFB.