

CITY OF NEW YORK  
CONFLICTS OF INTEREST BOARD  
Memorandum

To: Members of the Board  
From: Mark Davies  
RE: Proposed Charter Amendments  
Date: April 29, 2011

Staff recommends the following changes to the Board’s proposed amendments to Chapter 68 (references are to the attached December 1, 2010, draft):

- (1) Page 1, § 2600 (Preamble) – Add a sentence to the commentary that non-Chapter 68 agency rules are enforceable only by the agency and not by the COIB.
- (2) Page 7, § 2601(22) (definition of “represent”) – Add at the end of the sentence: “, whether with or without compensation”.
- (3) Page 20, § 2603(h)(6) (Board referrals to law enforcement agencies) – Delete this proposed amendment.
- (4) Page 28, § 2604(b)(3)(d) (limited business dealings exception) – Delete this proposed amendment.

- (5) Page 29, § 2604(b)(3)(e) – Reletter this proposed amendment as § 2604(b)(3)(d) if the current proposed § 2604(b)(3)(d) is deleted per recommendation (4) above.
- (6) Page 30, § 2604(b)(5) (gifts) – Delete the proposed amendment (the sentence beginning “No elected official”) prohibiting gifts from anyone to high-level public servants regardless of whether the donor has City business.
- (7) Page 35, § 2604(b)(9)(c) (requesting political activities by those with matters before the requester) – Delete this proposed amendment.
- (8) Page 36, § 2604(b)(9)(d) – Reletter this proposed amendment as § 2604(b)(9)(c) if the current proposed § 2604(b)(9)(c) is deleted per recommendation (7) above. Note the typo in the commentary: § 2604(b)(9)(c) should read § 2604(b)(9)(b).
- (9) Page 37, § 2604(b)(11)(d) (requesting political contributions from those with matters before the requester) – Delete this proposed amendment.
- (10) Page 48, § 2606(a-1) (debarment) – Seek enactment of this proposal by state law or delete it.