

**THE CITY OF NEW YORK
CONFLICTS OF INTEREST BOARD**

X

In the Matter of

Aleksey Rybushkin

COIB Case No. 2025-312

Annual Disclosure Appellant

X

**FINAL FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND ORDER**

Upon consideration of all the evidence presented in this matter, the New York City Conflicts of Interest Board (the “Board”) finds that, pursuant to Section 12-110(b)(3)(a)(4) of the New York City Administrative Code (“Admin. Code”) and Section 4-04 of the Rules of the Board, Title 53, Rules of the City of New York (the “Board Rules”), Aleksey Rybushkin is not required to file an annual disclosure report for calendar year 2024.

Rybushkin is an Administrative Project Manager at the New York City Department of Sanitation (“DSNY”). In April 2025, Rybushkin was notified that he had been designated by DSNY as a required filer pursuant to Admin. Code Section 12-110(b)(3)(a)(4) and was required to file an annual disclosure report for calendar year 2024. On April 10, 2025, Rybushkin appealed his designation as a required filer to DSNY, and DSNY denied his appeal on April 24, 2025. On May 15, 2025, Rybushkin appealed DSNY’s denial of his appeal to the Board.

Admin. Code Section 12-110(b) sets forth the categories of required filers of annual disclosure reports. In the present appeal, whether Rybushkin is required to file an annual disclosure report depends on whether he meets the filing criteria set forth in Admin. Code Section 12-110(b)(3)(a)(4). This section requires a City employee to file an annual disclosure report when the employee’s:

duties at any time during the preceding calendar year involved the negotiation, authorization or approval of contracts, leases, franchises, revocable consents, concessions and applications for zoning changes, variances and special permits, as defined by rule of the board and as annually determined by his or her agency head, subject to review by the board.

Board Rules Section 4-04 clarifies which employees with these duties are required to file. At the time Rybushkin was designated as a required filer by DSNY, Board Rules Sections 4-04(a)(4)-(5) included any employee who “[n]egotiates or determines the substantive

content of a . . . change order" and any employee who "recommends or determines whether or to whom a . . . change order should be awarded or granted."

In accordance with the Financial Disclosure Appeals Process, the burden is on DSNY to present specific evidence showing that Rybushkin's duties fall within this filing criteria. DSNY argues that Rybushkin is required to file an annual disclosure report because:

In 2024, he supervised construction contractors in the field. He reviews Change/Supplemental Work Orders, Payment Requisitions, and supervises, directed, and reviewed services and materials rendered and installed by the vendor. Change Order forms issued by DSNY are filled out and signed by the aforementioned individuals, supervisor, Engineering Audit Office, and the vendor for regular construction contracts. Supplemental Work Orders are for JOCS (Job Order Contracts). They are similar to change orders in that they are used to authorize the vendor to perform additional work from the original designated scope of work. The forms and documentation are also signed by the DSNY staff and the vendor.

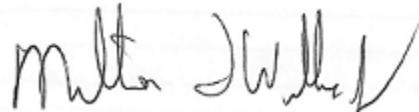
DSNY provided a screenshot of Rybushkin's tasks and standards stating that he "may plan, coordinate and oversee the development . . . of a major capital project program, including . . . vendor procurement." DSNY did not provide any other documentation in support of its argument.

Supervising the work of a vendor and reviewing payment requisitions for a vendor do not fall within the filing criteria of Admin. Code Section 12-110(b)(3)(a)(4) and Board Rules Section 4-04. While DSNY asserts that Rybushkin reviewed change orders, DSNY did not provide any evidence to establish that Rybushkin negotiated or determined the substantive content of a change order during 2024 or that Rybushkin recommended or determined whether a change order should be granted during 2024.

The Board concludes that DSNY has not established that Rybushkin's duties during calendar year 2024 meet the filing criteria of Admin. Code Section 12-110(b)(3)(a)(4) and Board Rules Section 4-04. Given that Board Rules Section 4-04 was repealed and replaced effective October 9, 2025, this decision shall apply only to the annual disclosure report concerning calendar year 2024.

WHEREFORE, IT IS HEREBY ORDERED, pursuant to Admin. Code Section 12-110(b)(3)(a)(4), that Rybushkin is not required to file an annual disclosure report for calendar year 2024.

The Conflicts of Interest Board



Milton L. Williams Jr., Chair

Wayne G. Hawley
Ifeoma Ike
Amy E. Millard
Georgia M. Pestana

Dated: November 13, 2025

cc: Aleksey Rybushkin
Flor Gutierrez, DSNY