

June 18, 2025 – Open Meeting Matter

To: The Board

From: Christopher M. Hammer *cmh*

Date: June 9, 2025

Re: Proposed New Board Rules § 1-19: Reporting of Gifts to the City
Proposed Amendments to Board Rules § 1-01(h) & § 1-14

Staff proposes that the Board amend its rules regarding the reporting of gifts to the City to require specific information about the acceptance of travel-related expenses, such as airfare, ground transportation, hotel, and meals, by a third party. The draft Notice of Public Hearing and Opportunity to Comment on Proposed Rules Regarding Donations and Gifts to the City is attached as **Exhibit 1**.

At present, there are two different ways these expenses are reported. First, each City agency must report, on an annual basis by February 28, “the name of any individual or firm that made one or more donations totaling \$5,000 or more to the agency during the previous calendar year, the total amount of these donations, and whether the donation was cash or an in-kind donation” (Board Rules § 1-14(c)(1)). Although this requirement is cross-referenced in the Board’s rule allowing public servants to accept travel-related expenses upon the approval of the public servant’s agency head (Board Rules § 1-01(h)), agencies’ reports do not include details about underlying travel paid for by third parties, and it is not apparent from the text of the rule that it applies to unsolicited gifts of travel-related expenses.¹ Agency reports are posted on the Board’s website.

¹ Board Rules § 1-01(h)(1) currently provides, in relevant part, that “a public servant may accept travel-related expenses from a third party as a gift to the City provided that the following conditions are met:

i. the trip is for a City purpose and therefore could properly be paid for with City funds;

Second, the Annual Disclosure Law requires a filer to identify the third party that paid for travel of \$1,000 or more, describe the travel-related expenses paid, and report the value of the travel-related expenses by range (between \$1,000 and \$4,999.99, between \$5,000 and \$54,999.99, and so on).² Elected officials' annual disclosure reports are posted on the Board's website; for other filers, this information is available to the public by requesting the filer's report.

Board Staff proposes to harmonize the existing reporting requirements and establish them in a new rule, proposed Board Rules § 1-19. This more robust reporting would provide further transparency for the acceptance of travel-related expenses, a topic about which the media and the public have expressed concern.³ To harmonize the rule requiring City agencies to report gifts to the City with that in the Annual Disclosure Law, the proposal would reduce the reporting threshold from \$5,000 to \$1,000. In addition, the new rule would require the reporting of additional information about travel that is already

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- ii. the travel arrangements are appropriate to that purpose;
 - iii. the trip is no longer than reasonably necessary to accomplish the governmental business which is its City purpose;
 - iv. the public servant received agency head approval in advance upon presenting such agency head with a detailed itinerary which reflects the trip's City purpose; and
 - v. all solicitation for and reporting of travel-related expenses are made in accordance with Board Rules § 1-14."

² Administrative Code § 12-110(d)(1)(h)(2), part of the Annual Financial Disclosure Law, requires filers to report: "Reimbursement to the person reporting or his or her spouse or domestic partner, for expenditures, excluding campaign expenditures and expenditures in connection with official duties reimbursed by the city, of one thousand dollars or more in each instance."

³ For example, when the Board amended Board Rules § 1-01(h) in 2020, the organization Reinvent Albany submitted a comment that sought additional restrictions on City agencies' acceptance of travel-related expenses by nongovernmental parties.

required to be collected as part of the agency's approval process for such travel pursuant to Board Rules § 1-01(h).

In proposing these additional requirements for reporting travel-related expenses paid by third parties, Board Staff reviewed reporting mechanisms in other jurisdictions, including the federal government, the requirements of which seemed most adaptable to the existing structure of Chapter 68 and the Annual Disclosure Law. A representative example of a federal travel disclosure is attached as **Exhibit 2**; to more readily adapt the new rule into the existing laws that the Board administers, Staff's proposal does not require as much detail as the federal rule.

Staff's proposal would also eliminate the requirement, currently contained in Board Rules § 1-14(c)(2), that an agency report the names of not-for-profit organizations that were beneficiaries of fundraising by agency employees. This report provides limited information to the public. Additional conforming and technical edits are described further in the draft Statement of Basis and Purpose.

With the Board's approval, Staff will formally submit the proposal to the New York City Law Department and the Mayor's Office of Operations for review and approval as required by the City Administrative Procedure Act prior to publication in the *City Record* and the holding of a public hearing. See Charter § 1043(d). Thereafter, we will come back to the Board with any substantive revisions requested by the Law Department or Office of Operations or, if there are none, schedule a public hearing.

New York City Conflicts of Interest Board

Notice of Public Hearing and Opportunity to Comment on Proposed Rules Regarding Donations and Gifts to the City

What are we proposing? The Conflicts of Interest Board is proposing to amend its rule concerning the reporting of donations and gifts to the City, including travel-related expenses.

When and where is the hearing? The Conflicts of Interest Board will hold a public hearing on the proposed rule. The public hearing will take place at [time] on [date]. The hearing will be at [TBD].

This location has the following accessibility option(s) available: [TBD].

How do I comment on the proposed rules? Anyone can comment on the proposed rules by:

- **Website.** You can submit comments to the Conflicts of Interest Board through the NYC Rules website at <http://rules.cityofnewyork.us>.
- **Email.** You can email comments to rules@coib.nyc.gov.
- **By speaking at the hearing.** Anyone who wants to comment on the proposed rule at the public hearing must sign up to speak. You can sign up before the hearing by contacting the Conflicts of Interest Board by telephone at [phone number] or by email at [email]. You can also sign up in the hearing room before the hearing begins on [date]. You can speak for up to three minutes.

Is there a deadline to submit comments? Yes, you must submit written comments by [date].

Do you need assistance to participate in the hearing? You must tell us if you need a reasonable accommodation of a disability at the hearing, including if you need a sign language interpreter. You can advise us by telephone at [phone number] or by email at [email]. You must tell us by [date].

Can I review the comments made on the proposed rules? You can review the comments made online on the proposed rules by going to the website at <http://rules.cityofnewyork.us>. Copies of all comments submitted online, copies of all written comments, and a summary of oral comments concerning the proposed rule will be available to the public on the Conflicts of Interest Board's website (<https://www1.nyc.gov/site/coib/public-documents/open-meetings-and-public-hearings.page>) as soon as practicable.

1 **What authorizes the Conflicts of Interest Board to make this rule?** Sections 1043
2 and 2603 of the City Charter authorize the Conflicts of Interest Board to make this
3 proposed rule. This proposed rule was included in the Conflicts of Interest Board's
4 regulatory agenda for Fiscal Year 2026.

5 **Where can I find the Conflicts of Interest Board rules?** The Conflicts of Interest Board
6 Rules are in title 53 of the Rules of the City of New York.

7 **What rules govern the rulemaking process?** The Conflicts of Interest Board must meet
8 the requirements of Section 1043 of the City Charter when creating or changing rules.
9 This notice is made according to the requirements of Section 1043 of the City Charter.

10 **Statement of Basis and Purpose**

11 The Conflicts of Interest Board proposes to amend its rules to add a public
12 reporting requirement for the City's acceptance of the payment by a third party of travel-
13 related expenses, such as airfare, ground transportation, hotel, meals, and conference
14 fees. The Board also proposes conforming edits to implement this new requirement and
15 additional technical edits.

16 *Reporting of Travel-Related Expenses*

17 Board Rules Section 1-01(h) permits, in certain circumstances, the acceptance of
18 travel-related expenses for City business travel paid for by a third party. The Board
19 proposes to add the requirement that City agencies annually report to the Board the
20 acceptance of travel-related expenses of \$1,000 or more along with the name and title
21 the public servant traveling, the event necessitating the travel, and the date(s) and
22 location of the event. As all of the information that would be reported must already be
23 collected by a City agency for purposes of obtaining agency-head approval for the
24 acceptance of travel-related expenses pursuant to Board Rules Section 1-01(h), the
25 burden of this new reporting requirement will be minimal.

1 There are several reasons the Board proposes to add this new reporting
2 requirement. When the Board last amended Board Rules Section 1-01(h) in 2020,
3 Reinvent Albany testified to voice its concerns about the risk of corruption or abuse in
4 permitting the acceptance by public servants of travel-related expenses paid by non-
5 governmental entities. The Board recognizes that the acceptance by public servants of
6 gifts of substantial value creates, at a minimum, a circumstance that would benefit from
7 increased transparency. In addition, the proposed reporting of travel-related expenses is
8 similar to those of other large cities, such as San Francisco and Chicago, which require
9 some form of public disclosure of travel-related expenses paid for by third parties. This
10 proposed reporting requirement will also provide data that will better inform the Board's
11 work regulating the acceptance of gifts of travel-related expenses by public servants.

12 *Conforming and Technical Edits*

13 The Board proposes to create a new section, proposed Board Rules Section 1-19,
14 to consolidate the existing requirements for reporting donations to the City (Board Rules
15 Section 1-14(c)(1)) and the new reporting requirement for gifts to the City of travel-related
16 expenses into a single reporting rule. In so doing, the Board aims to make these
17 requirements as consistent and simple as possible.

18 To that end, the Board proposes to set the reporting threshold in the new Board
19 Rules Section 1-19 for both donations to the City and gifts of travel-related expenses at
20 \$1,000. This amendment reduces the reporting threshold (\$5,000) from the current Board
21 Rules Section 1-14(c)(1) but makes all the reporting thresholds consistent internally and
22 with the reporting threshold for travel-related expenses in the City's Annual Disclosure

1 Law. Administrative Code § 12-110(d)(1)(h)(2). The proposed amendments include legal
2 cross-references to guide public servants.

3 In consolidating these reporting requirements, the Board proposes to eliminate the
4 requirement, currently contained in Board Rules Section 1-14(c)(2), that an agency report
5 the names of not-for-profit organizations that were beneficiaries of fundraising by agency
6 employees, a report of limited utility to individual public servants for complying with their
7 obligations under the conflicts of interest law.

8 The proposed amendments to Board Rules Section 1-01(h) would add a non-
9 exhaustive list of types of expenses considered travel-related expenses. Finally, the
10 proposed amendments would clarify the Board's intent that an agency head's approval of
11 its employees' travel pursuant to Board Rules Section 1-01(h) be in writing. This
12 requirement, although identified in the Statement of Basis and Purpose, was inadvertently
13 omitted in 2020 from the Board's adopted rule.

14 **Text of Proposed Rule**

15 New material is underlined.

16 [Deleted material is bracketed.]

17 **Section 1.** Subdivisions (1) and (3) of § 1-01(h) of Title 53 of the Rules of the City of New
18 York are amended to read as follows:

19 **§ 1-01(h) Travel and Travel-Related Expenses.**

20 (1) For the purposes of Charter § 2604(b)(3) and Charter § 2604(b)(5), a public
21 servant may accept travel-related expenses from a third party as a gift to the
22 City provided that the following conditions are met:

23 (i) the trip is for a City purpose and therefore could properly be paid for with
24 City funds;

(ii) [the]travel-related expenses, including but not limited to airfare, ground transportation, hotel, and meals, are consistent with government-class travel[arrangements are appropriate to that purpose];

(iii) the trip is no longer than reasonably necessary to accomplish the governmental business which is its City purpose;

(iv) the public servant received agency head approval in writing and in advance upon presenting such agency head with a detailed itinerary [which]that reflects the trip's City purpose;

(v) [all solicitation for and reporting of travel-related expenses are made in accordance with Board Rules § 1-14]a public servant soliciting travel-related expenses from an individual or firm has no particular matter involving that individual or firm pending before the public servant.

Reminder: Public servants who are required to file an annual financial disclosure report must, pursuant to Administrative Code § 12-110(d)(1)(h)(2), report the receipt of travel-related expenses from a third party of \$1,000 or more.

* * *

(3) A public servant may use [his or her]their own funds and accrued leave for personal travel before or after a trip taken for a City purpose provided that:

(i) any increased or additional costs resulting from the personal travel are borne solely by the public servant; and

(ii) such personal travel receives agency head approval in writing and in advance.

Section 2. § 1-14 of Title 53 of the Rules of the City of New York is amended to read as follows:

§ 1-14 Official Fundraising.

(a) For purposes of Charter § 2604(b)(2) and Charter § 2604(b)(3), a public servant may use [his or her]their position as a public servant to solicit a donation or gift to the City provided that all of the following conditions are met:

(1) The solicitation seeks a donation for one of the following:

(i) the City agency or office served by the public servant;

- 1 (ii) another City agency or office designated by the public servant's agency
2 head, with the [written] approval of the head of the other agency or office;
- 3 (iii) a not-for-profit organization subject to Chapter 9 of Title 3 of the
4 Administrative Code over which the public servant's agency head exercises
5 control as part of his or her City position;
- 6 (iv) a not-for-profit organization designated by the public servant's agency head
7 pursuant to subdivision (b) of this section, provided that the public servant
8 is not associated, within the meaning of Charter Section 2601(5), with the
9 organization or an employee of the organization.
- 10 (2) The solicitation is directed either to the general public or to an individual or firm
11 that does not have a particular matter pending before the public servant.
- 12 (3) The solicitation is accompanied by a disclaimer that a contribution will not affect
13 any business dealings with the City or provide special access to City officials.
- 14 (b) An agency head may designate [in writing] one or more not-for-profit organizations
15 for solicitations made by agency or office employees pursuant to subdivision (a) of
16 this section, provided that both of the following conditions are met:
- 17 (1) the not-for-profit organization has a clear and direct nexus to the City and its
18 residents and with the mission or duties of the City agency or office; and
- 19 (2) the agency head is not associated, within the meaning of Charter Section
20 2601(5), with the organization or an employee of the organization.
- 21 [(c) Pursuant to Charter § 2604(b)(2), each agency head must report to the Board
22 annually by February 28:
- 23 (1) the name of any individual or firm that made one or more donations totaling
24 \$5,000 or more to the agency during the previous calendar year, the total
25 amount of these donations, and whether the donation was cash or an in-kind
26 donation; and
- 27 (2) the name of any not-for-profit organization designated by the agency head
28 pursuant to subdivision (b) of this section for which agency employees solicited
29 donations during the previous calendar year.
- 30 (d) An agency head may submit to the Board a written request that disclosure,
31 pursuant to subdivision (c)(1) of this section, of one or more of its donors and/or
32 the amount of donation not be made public. The written request must be submitted
33 no later than January 31 for the previous calendar year and must explain why the
34 release of such information to the public may cause harm, threats, harassment, or
35 reprisals to the donor or to individuals or property affiliated with the donor. Whether

1 or not an agency head has submitted a request pursuant to this subdivision, the
2 Board may on its own initiative grant privacy as to any information submitted by an
3 agency head, upon a finding by the Board that the release of such information
4 would pose a risk to the safety or security of any person.]

5 [(e)](c) For purposes of this section, an elected official, including a District Attorney, is
6 the agency head of the staff members in [his or her]their office. The Speaker of the
7 New York City Council is the agency head of the central staff of the Council, and a
8 Council Member is the agency head for the staff of [his or her]their office.

9 **Section 3.** A new § 1-19 of Title 53 of the Rules of the City of New York is added to read
10 as follows:

11 **§ 1-19 Reporting of Gifts to the City.**

12 (a) Pursuant to Charter § 2604(b)(2), each agency head must report to the Board
13 annually by February 28:

14 (1) the name of any individual who or firm that made one or more gifts to the
15 agency totaling \$1,000 or more during the previous calendar year, the total
16 dollar value of these gifts, and whether the gifts were cash, in-kind, or the
17 payment of travel-related expenses.

18 (2) For the payment of travel-related expenses reported pursuant to subdivision
19 (1), the agency head must also report the name and title of the public servant(s)
20 traveling; the event(s) necessitating the travel; and the date(s) and location of
21 the event(s).

22 (b) An agency head may submit to the Board a written request that disclosure
23 pursuant to subdivision (a) of this section, of one or more of its donors and/or the
24 dollar value of the donation not be made public. The written request must be
25 submitted no later than January 31 for the previous calendar year and must explain
26 why the release of such information to the public may cause harm, threats,
27 harassment, or reprisals to the donor or to individuals or property affiliated with the
28 donor. Whether or not an agency head has submitted a request pursuant to this
29 subdivision, the Board may on its own initiative grant privacy as to any information
30 submitted by an agency head, upon a finding by the Board that the release of such
31 information would pose a risk to the safety or security of any person.

SEMIANNUAL REPORT OF PAYMENTS ACCEPTED FROM A NON-FEDERAL SOURCE					Form Approval.: 0416-GSA-SA		PAGE 1	OF PAGES 4
This report implements 31 U.S.C. 1353. It does not supersede other reports that may have to be filled when travel expenses are accepted under other authority. For definition and policies, see 41 CFR part 304-1.								
REPORTING DEPARTMENT OR AGENCY Department of Energy				REPORTING PERIOD				
				OCTOBER 1 - MARCH 31 (Year)	APRIL 1 - SEPTEMBER 10 (Year)	NEGATIVE REPORT		
				2024				
TRAVELER (Name/Title)		EVENT DESCRIPTION/SPONSOR/ DATES	LOCATION AND TRAVEL DATES	SOURCE	DESCRIPTION	CHECK	IN-KIND	AMOUNT
EXAMPLES	John Smith Secretary	Conference on Asia-Pacific Relations sponsored by Asia-Pacific Forum.	San Francisco, CA 8/11-13/93	Asia-Pacific Forum Pacific Rim Assoc.	Hotel Air Transportation Meals	X	X	\$280 825 120
	Joyce Smith Spouse of Secretary	Conference on Asia-Pacific Relations sponsored by Asia-Pacific Forum.	San Francisco, CA 8/11-13/93	Asia-Pacific Forum Pacific Rim Assoc.	Air Transportation Meals	X	X	\$825 120
	NAME		DESCRIPTION	LOCATION				
	Pranay Vaddi, NA-20		Speaker-Wilton Park Dialogue on Europe's Nuclear Future	Steyning, West Sussex, UK				
TITLE		SPONSOR	DATES					
NSC Senior Director for Arms Control, Disarmament, and Nonproliferation		Wilton Park						
		DATES: 9/11-14/24	9/11-9/14/24	Wilton Park				
NAME		DESCRIPTION	LOCATION					
Mark Ackiewicz, FE-20		Speaker-2024 California Hydrogen Convention, and share information on DOE Programs.	Los Angeles, CA					
TITLE		SPONSOR	DATES					
Deputy Assistant Secretary		DMG						
		DATES: 5/29-30/24	5/7-8/24	DMG				
NAME		DESCRIPTION	LOCATION					
Christopher Creed, LP-1		Speaker-Milken Institute Global Conference	Los Angeles, CA					
TITLE		SPONSOR	DATES					
Chief Investment Officer		Milken Institute						
		DATES: 5/5-8/24	5/5-10/24	Milken Institute				
NAME		DESCRIPTION	LOCATION					
Jeremy Avins, MESC-10		Subject-Matter Expert-Delegation Exchange of information and learning.	Denmark					
TITLE		SPONSOR	DATES					
Program Manager		Climate Imperative Foundation						
		DATES: 6/22-28/24	6/22-7/8/24					
					Airfare		X	2,800.00
					Food		X	610.00
					Transportation		X	550.00
					Lodging		X	950.00

AUTHORIZED FOR LOCAL REPRODUCTION

STANDARD FORM 326 (2-98)
Prescribed by GSA/OGE (41 CFR 301-1)

TRAVELER (Name/Title)	EVENT	LOCATION AND TRAVEL DATES	SOURCE	BENEFITS ACCEPTED			
	DESCRIPTION/SPONSOR/DATES			DESCRIPTION	CHECK	IN-KIND	AMOUNT
NAME	DESCRIPTION	LOCATION	Harvard University	Food		×	200.00
Jonah Wagner, LP-1	Speaker-Harvard Climate Symposium 2024	Cambridge, MA		Conference Fee		×	87.50
TITLE	SPONSOR	DATES					
Senior Advisor	Harvard University DATES: 6/10-11/24	6/9-11/24					
NAME	DESCRIPTION	LOCATION	*(only Manila portion of trip is non-federally sponsored (6/29-7/6/24). Full trip begins 6/16/24). International Atomic Energy Agency (IAEA)	Airfare	×		3,573.02
Meghan Hammond, GC-72	Speaker-IAEA Regional	Manila, Phillipipnes		Food	×		437.50
TITLE	SPONSOR	DATES		Transp \$109.85 Misc \$64.03	×		173.88
Genereal Attorney	IAEA DATES: 7/1-5/24	6/16-7/6/24		Lodging	×		475.60
NAME	DESCRIPTION	LOCATION	*(only Manila portion of trip is non-federally sponsored (6/29-7/6/24). Full trip begins 6/16/24). International Atomic Energy Agency (IAEA)	Airfare	×		2,111.85
James McRae, GC-72	Speaker-IAEA Regional Workshop	Manila, Philippines		Food	×		779.13
TITLE	SPONSOR	DATES		Transp \$259.58 Misc \$20.27	×		279.85
Assistant General Counsel	IAEA DATES: 7/1-5/24	6/14- 7/6/24		Lodging	×		1,489.17
NAME	DESCRIPTION	LOCATION	Mexican Hydrogen Society	Airfare		×	620.75
Sunita Satyapal, EE-3E	Speaker/Panel Discussion Member-2024 World Hydrogen Energy Conference	Tulum, Mexico		Conference Fee		×	525.00
TITLE	SPONSOR	DATES		Lodging			1,176.00
Director	Mexican Hydrogen Society DATES: 6/23-27/24	6/23-26/24					
NAME	DESCRIPTION	LOCATION	East TN Economic Council	Conference Fee		×	300.00
Brian Smith, NE-1	Speaker- 6th Annual Nuclear Opportunities	Alcoa/Knoxville, TN					
TITLE	SPONSOR	DATES					
Acting, Deputy Assistant Secretary	East TN Economic Council DATES: 7/30/24	7/29-30/24					

TRAVELER (Name/Title)	EVENT	LOCATION AND TRAVEL DATES	BENEFITS ACCEPTED				
	DESCRIPTION/SPONSOR/DATES		SOURCE	DESCRIPTION	CHECK	IN-KIND	AMOUNT
NAME	DESCRIPTION	LOCATION	German Federal Ministry for Economic Affairs, (German Government)	Airfare		×	39.00
Jian Fu, EE-4W	Speaker at Offshore Wind Deployment in the US Germany	Denmark, Germany 9/15-9/21; Berlin/ Hamburg 9/22-10/1		Food		×	216.00
TITLE	SPONSOR	DATES		Transporttion		×	95.00
Program Manager	German Government DATES: 9/23-26/24	9/15-10/1/2024		Conference Fee		×	250.00
NAME	DESCRIPTION	LOCATION	Skillsoft	Airfare		×	826.95
Melvin Fogle, OTM-LP	Panel Discussion Member at Skillsoft Professional Development Conference	Washington, DC		Transportation		×	41.35
TITLE	SPONSOR	DATES		Lodging		×	296.00
Program Manager, Learning Management SystemsI	Skillsoft DATES: 9/24	9/23-24/24					
NAME	DESCRIPTION	LOCATION	Government of India Ministry of New and Renewable Enegy	Airefare		×	3,010.00
Sunita Satyapal, EE-3H	Speaker at the International Conference on Green Hydrogen 2024	New Dehli, India		Transportation		×	58.00
TITLE	SPONSOR	DATES		Lodging		×	558.00
Director	Gov't of India, Ministry of New... DATES: 9/11-13/24	9/9-14/24					
NAME	DESCRIPTION	LOCATION	Australian Hydrogen Research Network (AHRN), Commonwealth Scientific and Industrial Research Organization (CSIRO)	Food		×	172.00
Marika Wieliczko, EE-3E	Speaker/Panel Member-Speak at AHRN Conference in Perth. Site visits to Perth and Melbourne.	Perth and Melbourne Australia		Conference Fee		×	475.00
TITLE	SPONSOR	DATES					
Technology Manager	CSIRO DATES: 9/4-6/24	8/31-9/10/24					
NAME	DESCRIPTION	LOCATION	S&P Global	Conference Fee		×	2,850.00
Daniel Cunningham, ARPA-E	Panel Discussion Member, CERAWeek 2024	Houston, TX					
TITLE	SPONSOR	DATES					
Deputy Director for Technology	S&P Global DATES: 3/18-22/24	3/18-21/24					

TRAVELER (Name/Title)	EVENT	LOCATION AND TRAVEL DATES	BENEFITS ACCEPTED				
	DESCRIPTION/SPONSOR/DATES		SOURCE	DESCRIPTION	CHECK	IN-KIND	AMOUNT
NAME	DESCRIPTION	LOCATION	Smart Electronic Power Alliance (SEPA) and Solar Energy Industries Association (SEIA)	Conference Fee		×	630.00
Jigar Shah, LPO	Speaker-RE+Master Speaker Series 2024	Anaheim, CA					
TITLE	SPONSOR	DATES					
	SEPA & SEIA	9/9-11/24					
Director	DATES: 9/9-11/24						
NAME	DESCRIPTION	LOCATION	Cambridge Forums	Food			796.88
Michael Consadine, 1A-60	Speaker-2024 Cambridge Forum on Investment Screening and Global A&M	Dublin, Ireland		Conference Fee			2,737.60
TITLE	SPONSOR	DATES		Lodging			796.88
	Cambridge, Forums	9/11-13/24					
Deputy Assistant Secretary	DATES: 9/11-13/24						
NAME	DESCRIPTION	LOCATION					
TITLE	SPONSOR	DATES					
	DATES:						
NAME	DESCRIPTION	LOCATION					
TITLE	SPONSOR	DATES					
	DATES:						
NAME	DESCRIPTION	LOCATION					
TITLE	SPONSOR	DATES					
	DATES:						