


**March 25, 2026 – Open Meeting Matter**

September 16, 2025 – Public Hearing

June 18, 2025 – Open Meeting

To: The Board

From: Ethan A. Carrier 

Date: March 13, 2026

Re: Proposed New Board Rules § 1-19 &  
Amendments to Board Rules §§ 1-01(h) and 1-14(c):  
Acceptance & Reporting of Gifts of Travel-Related Expenses

At its June 2025 Open Meeting, the Board considered proposed amendments to the Board's Valuable Gift Rule related to the acceptance and reporting of gifts of travel and travel-related expenses by public servants for travel on official City business. With the Board's approval (**Exhibit 1**) and the requisite certifications pursuant to the City Administrative Procedure Act from the New York City Law Department and the Mayor's Office of Operations, public hearing was noticed (**Exhibit 2**) and held on September 16, 2025, preceded by a public comment period. Staff returns to the Board with the written comments received (there was no oral testimony) and recommends that the Board extend the public comment period and hold a second public hearing.

**THE CURRENT TRAVEL RULE**

Board Rules § 1-01(h) permits a public servant to accept an otherwise prohibited gift of travel-related expenses from a third party provided that (1) "the trip is for a City purpose," (2) the "travel arrangements are appropriate to the City purpose," (3) the trip is "no longer than reasonably necessary to accomplish the governmental business which is its City purpose," and (4) the public servant has received approval from their City agency head. Board Rules § 1-01(h) further requires that, where a public servant solicits travel

gifts from third parties, such solicitations must be made and reported in accordance with Board Rules § 1-14, the Board's Official Fundraising Rule.<sup>1</sup>

### **THE PROPOSED AMENDMENTS**

While the proposed amendments to the Board Rules accomplish a number of minor technical and clarifying fixes, the principal purpose is to increase transparency with regard to the acceptance of travel gifts by public servants in two ways. First, the proposed amendments reduced the reporting threshold of all donations to the City, including gifts of travel-related expenses from \$5,000 to \$1,000, thus making almost all travel involving overnight trips or air travel subject, as a practical matter, to reporting (and attempting to better align this threshold for gift reporting with the threshold for the reporting of reimbursements for official travel-related expenses in the Annual Disclosure Law). Second, the proposed amendments would require reporting of additional information about gifts of travel beyond the value and the identity of the donor, including reporting of the identity of the public servants who traveled, the event to which the public servants traveled, and the date(s) and location of the event.

In proposing these amendments, the Board acknowledged that the acceptance by public servants of gifts of substantial value creates, at a minimum, a circumstance that would benefit from increased transparency. In addition to the benefit of public scrutiny of these gifts of travel expenses, the increased transparency would help the Board understand what gifts of travel are being accepted by public servants. At present, the Board has little information about the travel gifts being accepted by public servants

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<sup>1</sup> Board Rules § 1-14 regulates the solicitation of donations to the City and requires annual public reporting of such donations to City agencies where the cumulative donations from a single source total \$5,000 or more in a calendar year.

pursuant to Board Rules § 1-01(h) because the determination as to whether the travel gift may be accepted is made by the head of the public servant's City agency.

### **PUBLIC COMMENTS**

The Board received four public comments about the proposed amendments. Two of the public comments,<sup>2</sup> one from Reinvent Albany (**Exhibit 3**) and the other from four of the City's District Attorneys (**Exhibit 4**), lead Staff to conclude that the Board's rulemaking effort would benefit from additional information.

Reinvent Albany, a transparency and good-government advocacy not-for-profit organization, is mostly supportive of the Board's proposed rule amendments, but repeats its prior request that the Board "prohibit travel expense payments by corporations or nonprofits" (**Exhibit 3** at 1). The belief that prohibiting the acceptance of gifts of travel and travel-related expenses would have a deleterious effect on the ability of public servants to travel for important City purposes caused the Board to decline to adopt this recommendation when Reinvent Albany made it in its public comment in 2020 (**Exhibit 5**).

Four of the City's five District Attorneys state that assistant district attorneys ("ADAs") at their offices accept payment of travel-related expenses from third parties, often not-for-profit organizations or other governments, in order to travel to provide training, including continuing legal education ("CLE"), to prosecutors and law enforcement officers in other jurisdictions. The District Attorneys assert that requiring public reporting of the acceptance of payments of travel-expenses that include the identity of the ADA

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<sup>2</sup> Two other public comments address the lowering of the reporting threshold from \$5,000 to \$1,000. One comment is in favor of the new lower threshold. The second comment argues that the proposed threshold is not low enough. These comments are attached as **Exhibit 6**.

who is traveling would cause ADAs not to participate in these CLE programs that provide important information-sharing with other law enforcement offices and beneficial professional development. The District Attorneys request an exemption to the reporting requirements for CLE or other training provided to other government agencies or to not-for-profit organizations.

After receiving these comments, Staff engaged in additional information-gathering, informally seeking the views of a handful of attorneys who handle these matters at several City agencies. Staff specifically asked whether the increased transparency would cause any problems and discussed what travel must be approved by the Mayor's Office above and beyond what Chapter 68 would require. The small sample of City attorneys whose views were solicited believed the additional reporting would be manageable, that almost no one thought the transparency would cause any chilling effect on public servants' acceptance of gifts of travel, and that there are wide-ranging and inconsistent views about what sorts of trips must be reviewed pursuant to the Mayor's Office travel policy.

### **RECOMMENDATION**

Given the varied and disparate comments received by the Board thus far, and given the limited information on which to base a meaningful evaluation of these comments, Staff recommends the Board extend the public comment period for 30 days and hold a second public hearing so that the Board may obtain public comments regarding two groups of issues. Staff would seek public comment about the merits of Reinvent Albany's proposal to prohibit the acceptance of gift of travel and travel-related expenses, including whether other measures, including but not limited to additional public reporting or otherwise narrowing the kinds of City purposes for permitted third-party paid

travel, would satisfy the concern that the acceptance of such gifts under the strictures of Board Rules § 1-01(h) remains an unjustifiable risk to public integrity. Staff also believes it would be helpful to obtain public comments from City agencies about the scope of City travel, providing City agencies the opportunity to explain why and how the acceptance of such payments facilitates important City functions and the impact of having to pay for all official travel using City funds.

Accordingly, Staff recommends the Board issue the proposed public notice of the extension of opportunity to comment and second public hearing, which notice includes a series of detailed questions aimed at obtaining comments responsive to the above-described issues (**Exhibit 7**).

## Minutes of the Open Meeting of the New York City Conflicts of Interest Board

**Date:** June 18, 2025

**Present:**

Board Members: Chair Milton L. Williams Jr. and Members Wayne G. Hawley, Amy E. Millard, and Georgia M. Pestana

Board Staff: Anita Armstrong, Ethan A. Carrier, Christopher M. Hammer, Mark Milian, Carolyn Lisa Miller, Katherine J. Miller, Yasong Niu, Jeffrey Tremblay, Florence Watson, Katherine J. Weall, Maryann White, and Rafael Xu

Guests: None

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The open meeting was called to order by the Chair at approximately 9:36 a.m.

Staff presented a proposal to amend Board Rules § 1-01(h) regarding the acceptance of gifts for travel-related expenses and Board Rules § 1-14 regarding the reporting of donations, and to add new Board Rules § 1-19 regarding the reporting of gifts to the City with additional reporting requirements specific to travel-related expenses.

Board Member Hawley summarized the history of the Board's involvement in developing policies related to gifts and fundraising. Board Member Pestana asked a question to clarify that, if a City employee was sent by their City agency to moderate a conference and the travel costs were paid by the conference host, both the agency and the employee (assuming the employee was required to file an annual disclosure report) would be required to report travel-related expenses of \$1,000 or more.

The present Board Members unanimously approved submission of the proposal to the New York City Law Department and Mayor's Office of Operations.

The open meeting was adjourned at approximately 9:41 a.m.

Respectfully submitted,  
Katherine J. Miller  
Recording Secretary

## 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 3:00 p.m. on Tuesday, September 16, 2025. The hearing will be at Spector Hall, 22 Reade Street, New York, New York 10007.

This location has the following accessibility option(s) available: wheelchair accessible.

**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](mailto: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 (212) 437-0721 or by email at [hammer@coib.nyc.gov](mailto:hammer@coib.nyc.gov). You can also sign up in the hearing room before the hearing begins on September 16, 2025. You can speak for up to three minutes. Please note that the hearing is for accepting oral testimony only and is not held in a “Question and Answer” format.

**Is there a deadline to submit comments?** Yes, you must submit written comments by September 16, 2025.

**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 (212) 437-0721 or by email at [hammer@coib.nyc.gov](mailto:hammer@coib.nyc.gov). You must tell us by Friday, September 12, 2025.

**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.

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

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

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

### **Statement of Basis and Purpose**

The Conflicts of Interest Board proposes to amend its rules to add a public reporting requirement when City agencies accept payment by a third party for travel-related expenses, such as airfare, ground transportation, hotel accommodations, meals, and conference fees. The Board also proposes conforming edits to implement this new requirement and additional technical edits.

#### *Reporting of Travel-Related Expenses*

Board Rules Section 1-01(h) permits, in certain circumstances, the acceptance of travel-related expenses paid by a third party for official City business. The Board proposes to add the requirement that City agencies report any such expenses of \$1,000 or more along with the name and title of the public servant who traveled, the event necessitating travel, and the date(s) and location of the event. Because City agencies must already collect this information to obtain agency-head approval under Section 1-01(h), this new reporting requirement would impose only a minimal administrative burden.

The Board proposes to add this new reporting requirement for several reasons. When the Board last amended Board Rules Section 1-01(h) in 2020, Reinvent Albany testified about the potential for corruption or abuse in permitting the acceptance by public servants of travel-related expenses non-governmental entities. The Board recognizes that the acceptance by public servants of gifts of substantial value warrants increased transparency. In addition, other large cities such as San Francisco and Chicago mandate public disclosure for travel-related expenses paid for by third parties. The information reported may inform future Board rulemaking.

#### *Conforming and Technical Edits*

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

To that end, the Board proposes to set the reporting threshold in the new Board Rules Section 1-19 for both donations to the City and gifts of travel-related expenses at \$1,000. This change lowers the current reporting threshold of \$5,000 in Board Rules Section 1-14(c)(1) so that it is consistent with the reporting threshold in the Annual Disclosure Law (Administrative Code Section 12-110(d)(1)(h)(2)). The proposed amendments also include legal cross-references to guide public servants.

In consolidating these reporting requirements, the Board also proposes to eliminate the requirement, currently contained in Board Rules Section 1-14(c)(2), that an

agency report the names of not-for-profit organizations that were beneficiaries of fundraising by agency employees, a report of limited utility to meet the transparency aims of the rule.

The proposed amendments to Board Rules Section 1-01(h) would clarify the meaning of “travel-related expenses” by adding a list of examples and a reference to Comptroller’s Directive No. 6 as defining government-class travel. Finally, the proposed amendments would require that agency-head approval of their employees’ travel pursuant to Board Rules Section 1-01(h) must be in writing. This requirement, although identified in the Statement of Basis and Purpose, was inadvertently omitted in 2020 from the Board’s adopted rule.

The proposed amendments do not replace or eliminate the current requirement of Administrative Code § 12-110(d)(1)(h)(2) that annual financial disclosure filers report the receipt of travel-related expenses from a third party of \$1,000 or more.

### **Text of Proposed Rule**

New material is underlined.

[Deleted material is bracketed.]

Asterisks (\*\*\*) indicate unamended text.

**Section 1.** Paragraphs (1) and (3) of subdivision (h) of section 1-01 of Title 53 of the Rules of the City of New York are amended to read as follows:

- (1) For the purposes of Charter § 2604(b)(3) and Charter § 2604(b)(5), 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;
- (ii) [the] travel-related expenses, including but not limited to airfare, ground transportation, hotel accommodations, and meals, are consistent with government-class travel as set forth in Comptroller's Directive No. 6 [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 a person or firm has no particular matter involving that person or firm pending before the public servant.

Reminder: Annual financial disclosure filers must report any travel-related expenses of \$1,000 or more that they receive from a third party, as required by Administrative Code § 12-110(d)(1)(h)(2).

\* \* \*

- (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.** Section 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;
  - (ii) another City agency or office designated by the public servant's agency head, with the [written] approval of the head of the other agency or office;
  - (iii) a not-for-profit organization subject to Chapter 9 of Title 3 of the Administrative Code over which the public servant's agency head exercises control as part of [his or her] their City position;
  - (iv) a not-for-profit organization designated by the public servant's agency head pursuant to subdivision (b) of this section, provided that the public servant is not associated, within the meaning of Charter Section 2601(5), with the organization or an employee of the organization.
- (2) The solicitation is directed either to the general public or to [an individual] a person or firm that does not have a particular matter pending before the public servant.
- (3) The solicitation is accompanied by a disclaimer that a contribution will not affect any business dealings with the City or provide special access to City officials.
- (b) An agency head may designate [in writing] one or more not-for-profit organizations for solicitations made by agency or office employees pursuant to subdivision (a) of this section, provided that both of the following conditions are met:
- (1) the not-for-profit organization has a clear and direct nexus to the City and its residents and with the mission or duties of the City agency or office; and
  - (2) the agency head is not associated, within the meaning of Charter Section 2601(5), with the organization or an employee of the organization.
- (c) [Pursuant to Charter § 2604(b)(2), each agency head must report to the Board annually by February 28:
- (1) 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; and
  - (2) the name of any not-for-profit organization designated by the agency head pursuant to subdivision (b) of this section for which agency employees solicited donations during the previous calendar year.
- (d) An agency head may submit to the Board a written request that disclosure, pursuant to subdivision (c)(1) of this section, of one or more of its donors and/or

the amount of donation not be made public. The written request must be submitted no later than January 31 for the previous calendar year and must explain why the release of such information to the public may cause harm, threats, harassment, or reprisals to the donor or to individuals or property affiliated with the donor. Whether or not an agency head has submitted a request pursuant to this subdivision, the Board may on its own initiative grant privacy as to any information submitted by an agency head, upon a finding by the Board that the release of such information would pose a risk to the safety or security of any person.

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

**Section 3.** Title 53 of the Rules of the City of New York is amended by adding a new section 1-19, to read as follows:

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

- (a) For the purposes of Charter § 2604(b)(2), each agency head must report to the Board annually by February 28 the following information for the previous calendar year:

(1) the name of any person or firm that made one or more gifts to the agency totaling \$1,000 or more, the total dollar value of any such gifts, and whether any such gifts were cash, in-kind, or payment of travel-related expenses stated in § 1-01(h)(ii).

(2) For any reported payment of travel-related expenses pursuant to subdivision (1), the agency head must also report: the name and title of the public servant(s) who traveled; the event(s) necessitating travel; and the date(s) and location(s) of the event(s).

- (b) An agency head may request in writing that the Board withhold from public disclosure the name of a donor and/or the value of their donation. This request must be submitted no later than January 31 for the previous calendar year and must explain why disclosure may result in harm, threats, harassment, or reprisals to the donor or to affiliated persons or property. Whether or not an agency head has submitted such a request, the Board may on its own initiative withhold such information if it finds that disclosure would pose a risk to the safety or security of any person.

**NEW YORK CITY MAYOR'S OFFICE OF OPERATIONS  
253 BROADWAY, 10<sup>th</sup> FLOOR  
NEW YORK, NY 10007  
212-788-1400**

**CERTIFICATION / ANALYSIS  
PURSUANT TO CHARTER SECTION 1043(d)**

**RULE TITLE: Amendment of Rules Relating to Acceptance and Reporting of Donations**

**REFERENCE NUMBER: COIB-30**

**RULEMAKING AGENCY: Conflicts of Interest Board**

I certify that this office has analyzed the proposed rule referenced above as required by Section 1043(d) of the New York City Charter, and that the proposed rule referenced above:

- (i) Is understandable and written in plain language for the discrete regulated community or communities;
- (ii) Minimizes compliance costs for the discrete regulated community or communities consistent with achieving the stated purpose of the rule; and
- (iii) Does not provide a cure period because it does not establish a violation, modification of a violation, or modification of the penalties associated with a violation.

/s/ Francisco X. Navarro  
Mayor's Office of Operations

July 22, 2025  
Date

**NEW YORK CITY LAW DEPARTMENT  
DIVISION OF LEGAL COUNSEL  
100 CHURCH STREET  
NEW YORK, NY 10007  
212-356-4028**

**CERTIFICATION PURSUANT TO  
CHARTER §1043(d)**

**RULE TITLE:** Amendment of Rules Relating to Acceptance and Reporting of Donations

**REFERENCE NUMBER:** 2025-RG-054

**RULEMAKING AGENCY:** Conflicts of Interest Board

I certify that this office has reviewed the above-referenced proposed rule as required by section 1043(d) of the New York City Charter, and that the above-referenced proposed rule:

- (i) is drafted so as to accomplish the purpose of the authorizing provisions of law;
- (ii) is not in conflict with other applicable rules;
- (iii) to the extent practicable and appropriate, is narrowly drawn to achieve its stated purpose; and
- (iv) to the extent practicable and appropriate, contains a statement of basis and purpose that provides a clear explanation of the rule and the requirements imposed by the rule.

/s/ STEVEN GOULDEN  
Senior Counsel

Date: July 21, 2025



**Testimony to the New York City Conflicts of Interest Board (COIB)  
on Proposed Rules Regarding Reporting of Travel Payments**

***Re: Greater reporting of city travel payments should come with  
more fundraising disclosures for public servants, not less***

September 16, 2025

Thank you for the opportunity to submit written testimony for this hearing. Reinvent Albany advocates for transparent and accountable government in New York. Our testimony covers two areas of interest in the regulations: (1) reporting of travel payments, and (2) fundraising by city employees.

***Travel Payments***

We appreciate that the Conflicts of Interest Board’s (COIB) [proposed rules](#) seek to address public concern about city employees accepting private funding for travel expenses. In our [testimony from March 2020 to COIB](#), we asked the COIB to prohibit travel expense payments by corporations or nonprofits. Ultimately, a ban on travel payments was not adopted by COIB, [per its position](#) that it was “counter to...decades of Board practice.”

We find COIB’s position on this issue disappointing. “We have always done it this way” is not persuasive given the various travel-related scandals that occurred during the [Eric Adams administration](#). Given the large number of [press accounts](#), we think it is obvious that special interests are attempting to influence city officials by paying for their travel, which is of substantial value that does not count as a campaign contribution or personal gift.

That said, we strongly support your proposal to expand disclosure requirements, specifically:

1. **Reducing the agency reporting threshold of travel contributions from \$5,000 to \$1,000** to make them consistent with gift reporting in the annual disclosure law.
2. **Technical changes** that:
  - a. travel expenses must be consistent with “government-class travel,”

- b. approval by agency heads be in writing, and
- c. clarifying that the individual or firm providing the expense payments must not have matters before the public servant.

***COIB should clarify that it is not permissible to solicit or accept travel payments***

We ask that COIB clearly state that it is not permissible for a public servant to *solicit* or *accept* payments from a firm or individual with matters before the public servant. COIB's proposed changes only mention *solicitation*.

***Fundraising by city officials in their government role and on taxpayer-funded time should be reported***

We oppose COIB's proposal to eliminate reporting by agencies of the names of not-for-profit organizations that were beneficiaries of fundraising by agency employees on agency time for two reasons:

1. **We disagree that the reports are “of limited utility.”** While COIB believes that they are not useful to public servants, they are of interest to the public. Indeed, Reinvent Albany frequently receives inquiries from reporters and other members of the public about nonprofit fundraising by city employees, and frequently reviews the lists of designated nonprofits.
2. **The reports of nonprofit fundraising by city employees should be made more useful rather than eliminated altogether.** Currently, only the names of nonprofits are listed in [spreadsheets published by COIB](#) – not the level of fundraising that occurred. If COIB is interested in ensuring its regulations fulfill its mission of providing high-value information to the public about potential conflicts of interest, it should increase the level of disclosure with the specific amounts raised for nonprofits by city agency staff.

Additionally, the regulations strike “in writing” from §1-14(b), which currently requires that agency heads designate not-for-profit organizations for solicitation by city employees. We do not see why it is useful to create ambiguity regarding how designations are made. Would this revision, for example, allow a designation to be made orally from an agency head to a city employee? We ask that “in writing” be retained to ensure that there is a paper trail regarding approvals of fundraising by public servants.

Thank you again for the opportunity to submit testimony. Please send any follow-up questions to Rachael Fauss at rachael [at] reinventalbany.org.



Darcel D.  
Clark

District  
Attorney



Eric  
Gonzalez

District  
Attorney



Melinda  
Katz

District  
Attorney



Michael E.  
McMahon

District  
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September 16, 2025

New York City Conflicts of Interest Board  
2 Lafayette Street  
New York, NY 10007

By email to [hammer@coib.nyc.gov](mailto:hammer@coib.nyc.gov)

Re: Comments on COIB Proposed Rule Changes Regarding Donations and Gifts to the City

To the New York City Conflict of Interest Board:

The undersigned District Attorneys wish to thank the Board for its efforts to improve transparency by amending its rules regarding travel-related expenses paid by third parties. We agree that transparency in this area is an important objective for the Board and for government agencies generally. With this in mind, we have carefully reviewed the proposed amendments, leading us to ask for a clarification and to make a request regarding a specific category of reimbursed expenses that, we believe, would erroneously be reported as “gifts” under the rule as amended, thereby undermining critical agency objectives and vital professional development within our offices.

By way of background, our attorneys, as experts in many legal fields, are often asked to provide Continuing Legal Education training to other attorneys or trainings for members of law enforcement. These trainings often involve travel, and the host will often pay or reimburse our attorneys for the expenses our ADAs incur to deliver the requested training. The host is often another non-profit or governmental agency. Reimbursements in these situations are not gifts, however, they may fall within the ambit of the newly proposed rule, and it may discourage participation by our lawyers in these important trainings. This would be deeply unfortunate; their voices are important and valuable voices to have at the table for the trainings in their respective areas of expertise.

Describing travel expenses paid in exchange for CLE programs as “gifts” would be, we believe, misleading to the public. Gifts, not only in ordinary parlance but under any legal definition, are items of value conferred upon a person or party without anything of value being provided in return. Both

Merriam-Webster and Black's Law Dictionary define a "gift" as "something voluntarily transferred by one person to another without compensation." Members of the public, then, would regard paid expenses reported as gifts as just that, gifts in the form of travel provided to the office or to members of the office with nothing provided in exchange. But where Continuing Legal Education presentations are offered to the third party in exchange for payment or reimbursement of expenses, they are not in fact gifts at all. Unfortunately, mislabeling these paid expenses leads to confusion, not to transparency.

Adding to the potential confusion is that the payment of these expenses in exchange for valuable services would be described as "gifts" in much the same way as the rules describe true "gifts" from third parties to individual employees. The Board's rules against taking outright "gifts" from third parties who do business with the City in excess of \$50 are laudable and implicate significant concerns about undue influence in the performance of City duties. But these "gifts" are not comparable to the travel expense reimbursements for a valuable CLE program legitimately provided to a third party. Also lumped into the same category are other true gifts, such as third-party donations to the office in the form of gift cards or iPad for distribution at gun buy-backs. While the latter are accurately described as gifts, as they are provided without any consideration in exchange, they are not similar to payments for expenses allowing valuable CLE services to be provided to the third party. Still further, while travel expense payments are technically denominated under the amendments as "gifts" to the City, they must also be reported by annual financial disclosure filers as gifts to them as individuals, again blurring the meaning of the word "gift" for members of the public struggling to understand the very different types of "gifts" being reported.

Also of substantial concern is that the amendments would require identifying the individual member of the office that provided these services. In so doing, the amendments will not only again suggest that the "gift" is to the individual employee, they will, even more importantly, also discourage staff participation in providing much-sought-after CLE content. We believe that ADAs would choose to forego participation in these CLE programs rather than be singled out as the recipient of what might be perceived by the public as unnecessary "gifts." This is all the more likely because these ADAs are, by and large, individuals who are not required to file annual financial disclosure reports and who would be highly reluctant to engage for the first time in this form of reporting.

By disincentivizing participation in these valuable programs, the amendments would undermine interests critical to our public safety mission and discourage professional development. Sharing insights into criminal organizations and behavior helps third parties protect themselves against victimization. Sharing experiences providing alternative dispositions advances the development of new and even more successful programs helping offenders avoid re-offending. And sharing critical legal content and updates advances the proper administration of justice in our courts. Moreover, those providing CLE content, as well as those attending those CLE's, obtain the benefit of professional development, necessary for our offices to thrive. For these reasons, we are concerned that, to the extent that the rules misuse the label "gifts" and discourage participation in these programs, important interests of our offices and the City will be undermined.

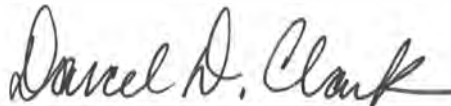
To be clear, the District Attorneys do not oppose the reporting of gifts that are accurately described or understood as such. We respectfully request an exemption for travel reimbursement for training delivered to other governmental agencies or non-profits.

We note as well that other aspects of the rule are not entirely clear. While the rule sets a threshold of \$1000, it does not explicitly say whether the threshold is per trip or aggregated over the course of a year for the particular third party paying expenses. Similarly, the amendments do not expressly state whether travel-related expenses paid by an agency or arm of a different government must be reported. Clarification on these points would assist in understanding and implementing the amendments.

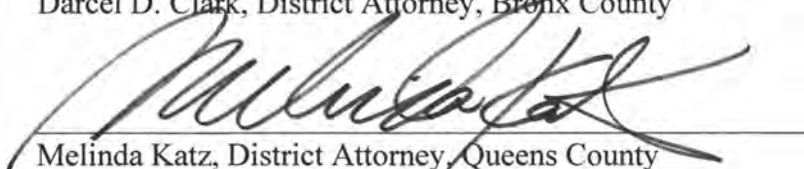
Finally, the \$1000 threshold for reporting travel-related raises additional questions. While that threshold is presumably designed to mirror the \$1000 threshold for individual filers reporting travel-related expenses, this is a false equivalency. The \$1000 for individuals, for example, will ordinarily not be met for providing a CLE in Albany to a not-for-profit agency. But, if those payments are aggregated over the course of a year by different employees assisting a single not for profit, the threshold will routinely be met and routinely require reporting well beyond the individual-filer rule. That these seemingly similar thresholds operate in very different ways sows additional confusion. Raising the threshold on aggregated expense payments would more properly reflect potential concerns over office-wide reimbursement of travel expenses by third parties.

In closing, we again wish to commend the Board on its continuing efforts to increase transparency for city agencies. Robust, and accurate, reporting is essential to foster public accountability of city agencies and public trust in our city government.

Sincerely,



Darcel D. Clark, District Attorney, Bronx County



Melinda Katz, District Attorney, Queens County



Michael E. McMahon, District Attorney, Richmond County



Eric Gonzalez, District Attorney, Kings County



**Testimony to the New York City Conflicts of Interest Board (COIB)  
on Proposed Rules Regarding Gifts of Travel**

**March 6, 2020**

Good afternoon Chair Briffault and members of the Conflicts of Interest Board (COIB). My name is Tom Speaker, and I am a Policy Analyst for Reinvent Albany. We advocate for open and accountable New York government.

Today we are testifying on changes being made to Board Rule §1-01(h) regarding gifts of travel.

Reinvent Albany supports many of the proposed changes to §1-01(h), which provide much-needed clarity on how public servants should handle vouchers and trips paid for by third parties. The additions to §1-01(h)(1) in particular will be useful for ensuring public servants seek permission for third-party-funded travel, and help them better determine what constitutes an acceptable use of third-party funds for public business.

**Our testimony today makes three major recommendations to further strengthen the rules:**

- 1. Prohibit elected officials from receiving corporate or nonprofit funding for City travel**
- 2. Require public servants to receive approval from COIB for all travel funded by third parties**
- 3. Require public servants to transfer all frequent flyer miles acquired through official business to the City**

## **1. Prohibit elected officials from receiving corporate or nonprofit funding for City travel**

Reinvent Albany opposes the provisions under §1-01(h)(2) allowing elected officials to receive corporate or nonprofit funding for City travel. We believe this is a considerable risk for abuse and that elected officials should be required to pay for such travel with personal or campaign funds.

Third-party-funded travel already creates a corruption risk as funders could easily exploit the good will they've accumulated with elected officials to later influence City policy or have their past behavior rewarded. Even if the travel is treated as a "gift to the City," elected officials still get to enjoy hotels, catering, and sightseeing that might impact their future decisions. New York City has already seen conflicts arise when officials have had travel paid for by companies, such as when voting machine company Election Systems & Software paid for NYC Board of Elections executive director Michael Ryan's travel while he served on the company's advisory board.<sup>1</sup>

Travel funded by other city or state governments should be permitted as it allows for collaboration and learning opportunities, but COIB should prohibit corporate and nonprofit funding for all City travel by elected officials.

## **2. Require public servants to receive approval from COIB for all travel funded by third parties**

We urge COIB to require Board approval for *all* public travel that involves third-party funding for public servants (including agency heads), rather than allowing officials to approve their staff's and their own travel as proposed under §1-01(h)(1)(iv) and §1-01(h)(7). We recognize that this may create an additional workload for COIB staff but believe such a process would better protect the City from pay-to-play.

§1-01(h)(7) effectively allows agency heads to oversee their own conflicts of interest, a practice with a concerning history. JCOPE once allowed Joe Lhota to oversee his own conflicts when he served both as Chair of the MTA Board and a director on the board of the Madison Square Garden Company, despite the extensive dealings between the two

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<sup>1</sup> Courtney, Gross. "NYC Board of Elections Boss Resigns from Voting Machine Advisory Board After NY1 Investigation." December 11, 2018. *Spectrum News NY1*.  
<https://www.ny1.com/nyc/all-boroughs/politics/2018/12/12/mike-ryan-board-of-elections-executive-director-resigns-from-election-systems-and-software-es-s-advisory-board>

entities. Within a year, JCOPE determined that Lhota could not continue his position at the MTA, as there was no way to resolve the conflict.<sup>2</sup>

Given the risks involved, public servants should have to provide detailed itineraries and receive COIB approval for *all* third-party funded travel, with such approval made public in advance of trips.

### **3. Require public servants to transfer all frequent flyer miles acquired through official business to the City**

§1-01(h)(6) provides that public servants are allowed to collect frequent flyer miles for trips taken on public business, on the basis that banning the accrual of miles would be too difficult to administer. Reinvent Albany believes that public servants should be required to transfer frequent flyer miles to the City when possible.

We understand that there are hurdles in enforcing such a rule, but the Board's other proposed rule prohibiting compensation for surrendered seats will be similarly difficult to enforce. We are also concerned about public servants exploiting the revised rule for their personal benefit: Former Assembly Speaker Sheldon Silver was known to use public funds to fly from New York City to Albany through the District of Columbia and accumulate more frequent flyer miles. During his tenure, Silver used at least \$20,000 in taxpayer funds to collect 200,000 miles.<sup>3</sup>

Administrative hurdles have not stopped other states from banning the personal use of frequent flyer miles accrued through public business. As COIB notes in Advisory Opinion 2006-05, Ohio bans personal use of frequent flyer miles gained through public business.<sup>4</sup> At the very least, New York City could follow Hawaii and require public servants to transfer frequent flyer miles acquired on official business to the City unless technically impossible. If states around the country have stronger restrictions, we do not see why New York City cannot as well.

Thank you for the opportunity to testify today. I welcome any questions you may have.

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<sup>2</sup> Rubinstein, Dana, "Potential conflicts of interest the real reason Lhota left the MTA." *Politico New York*. July 30, 2019. <https://www.politico.com/states/new-york/albany/story/2019/07/30/potential-conflicts-of-interest-the-real-reason-lhota-left-the-mta-1122198>

<sup>3</sup> Giove, Candice M. "Sheldon Silver goes out of his way to bank frequent flyer miles – and you pay for it." *New York Post*. August 11, 2013. <https://nypost.com/2013/08/11/sheldon-silver-goes-out-of-his-way-to-bank-frequent-flier-miles-and-you-pay-for-it/>

<sup>4</sup> Conflicts of Interest Board. "Advisory Opinion No. 2006-05." August 24, 2006. [https://www1.nyc.gov/assets/coib/downloads/pdf5/aos/2004-2013/AO2006\\_05.pdf](https://www1.nyc.gov/assets/coib/downloads/pdf5/aos/2004-2013/AO2006_05.pdf)

# NYC Rules



## Donations and Gifts to the City

Print PDF Email

**Rule status:** Proposed

**Agency:** COIB

**Comment by date:** September 16, 2025

[📄 Rule Full Text](#)

COIB-Proposed-Amendment-of-Rules-Relating-to-Acceptance-and-Reporting-of-Donations-as-submitted-to-City-Record.pdf

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.

**Send comments by**

- Email: [hammer@coib.nyc.gov](mailto:hammer@coib.nyc.gov)

- **Mail:** Conflicts of Interest Board, 2 Lafayette Street Room/Floor: Suite 1010 ; New York, New York 10007

## Public Hearings

Attendees who need reasonable accommodation for a disability such as a sign language translation should contact the agency by calling [1 \(212\) 437-0721](tel:12124370721) or emailing [hammer@coib.nyc.gov](mailto:hammer@coib.nyc.gov) by **September 12, 2025**

### Tuesday Sep 16 - 3:00pm EST

#### Date

September 16, 2025  
3:00pm - 3:30pm EST

[Google Calendar](#)

[Outlook/Apple Calendar](#)

#### Location

Spector Hall  
22 Reade Street  
New York City New York 10007

[Directions](#)

#### Disability Accommodation

- Wheelchair Accessible

**Comments are now closed.**

**Online comments: 2**

**Lily  
Scarabino**

I support the change in minimum reporting amount to \$1000.00.

Comment added August 20, 2025 10:19am

**Soraya  
Abellard**

The amount threshold to report needs to be even lower. Where is the figure of \$1,000 estimated from? This number should be matched to the travel expectations of your average constituents. Public servants don't need extravagant travel for work purposes, and any amount that is over what the average New Yorker would spend on their own travel has high potential for circumventing bribery, favoritism, and unspoken alliances with corporations. The average working New Yorker can rarely afford the MTA or to leave the city for the weekend, much less spend \$1,000 per short trip. For example, at the current price of the MTA, a person taking 2 trips per day at \$2.90 would spend \$162 per month. If the gifted amount for travel is in excess of what the average person would spend for the trip on their own wallet, it needs to be transparent, preferably with a detailed and itemized report of what was contributed. A more realistic figure that reflects the travel budgets of common New Yorkers would be closer to the \$500 range. In 2022, the Office of the New York State Comptroller detailed in a report that "domestic business visitors spend an average of \$860 per person, more than twice the spending of domestic leisure tourists". Additionally, it details that the average spending for a domestic leisure traveler is \$492 per person per trip. Per these numbers, \$1,000 is an excessive limit. Bad actors seeking political favors could easily manage to disguise perks as travel expenses under the \$1,000 mark. A realistic minimum reporting amount would be \$500, making it clear which travel expenses are beyond the spending

habits and expectations of what a constituent could provide or afford.

 [Comment attachment](#)

report-2-2022.pdf

Comment added September 5, 2025 11:37am

**Directory of City Agencies**

**Notify NYC**

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## New York City Conflicts of Interest Board

### **Notice of Extension of Public Comment Period and Second Public Hearing on Proposed Rules Regarding Donations and Gifts to the City**

**What are we proposing?** The Conflicts of Interest Board is extending the public comment period for its proposal to amend its rule concerning the reporting of donations and gifts to the City, including travel-related expenses. The Board seeks public comments and testimony on several specific questions enumerated below.

**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 [DAY OF WEEK], [MONTH] [DAY], 2026. The hearing will be at Spector Hall, 22 Reade Street, New York, New York 10007.

This location has the following accessibility option(s) available: wheelchair accessible.

**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](mailto: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 (212) 437-0721 or by email at [hammer@coib.nyc.gov](mailto:hammer@coib.nyc.gov). You can also sign up in the hearing room before the hearing begins on [MONTH] [DAY], 2026. You can speak for up to three minutes. Please note that the hearing is for accepting oral testimony only and is not held in a “Question and Answer” format.

**Is there a deadline to submit comments?** Yes, you must submit written comments by [MONTH] [DAY], 2026.

**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 (212) 437-0721 or by email at [hammer@coib.nyc.gov](mailto:hammer@coib.nyc.gov). You must tell us by [DAY OF WEEK], [MONTH] [DAY], 2026.

**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.

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

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

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

### **Solicitation of Comments**

The Conflicts of Interest Board is extending the opportunity for public comment and holding a second public hearing to receive testimony regarding its proposal to amend its rules to add a public reporting requirement when City agencies accept payment by a third party for travel-related expenses, such as airfare, ground transportation, hotel accommodations, meals, and conference fees, and other conforming and technical amendments. The text of the Proposed Rule and its Statement of Basis and Purpose are below.

During the prior public comment period and public hearing, held on September 16, 2025, the Board received four written comments. Two of those comments, one from Reinvent Albany and a second from four of the City’s District Attorneys, lead the Board to seek additional public comment and testimony. In its comment, Reinvent Albany reiterated its March 2020 request that the Board “prohibit travel expense payments by corporations and not for profits,” arguing that “special interests are attempting to influence City officials by paying for their travel.” In their comment, four District Attorneys question whether the Board can and should require the reporting of “travel expenses offered in

exchange for [Continuing Legal Education] programs as ‘gifts’,” arguing that this categorization would be “misleading to the public” and would “discourage staff participation in providing much sought-after CLE content,” because staff would “forego participation” rather than be “singled out as the recipient” of a gift.

The Board does not seek to deprive City agencies of a source of travel resources that facilitate important City functions or that would cause public servants to refuse the acceptance of travel and travel-related payments from third parties where such travel serves an important City function. On the other hand, the Board does not have the information necessary to conclude that these gifts of travel and travel-related expenses are, in fact, serving any important City function or that the scrutiny being applied by City agencies to the acceptance of these payments is sufficiently deterring the acceptance of such payments where the City purpose of doing so is scant.

Accordingly, the Board seeks additional comments on the proposed rule and more generally on the role that the acceptance of travel and travel-related expenses plays both in the work of City agencies and in the public’s perception of the impartiality of that work. In particular, the Board requests responses to the following questions:

For the Public:

Board Rules Section 1-01(h) already requires that any gift of travel or travel-related experiences must be (1) approved by the appropriate City agency head (2) must serve a City purpose, (3) must be government-class travel, and (4) cannot be longer than reasonably necessary to achieve the City purpose of the travel. The Board seeks comments regarding what, if any, additional steps or limitations could be required to minimize any risk of a conflict of interest in the acceptance of such gifts of travel or travel-related expenses. In particular, the Board seeks comments addressing the addition of safeguards such as public reporting

of the acceptance of such gifts, and/or limitations on the City purposes of such gifts, the donors of such gifts, the public servants who may accept such gifts, the geographic locations of the travel, and the procedures for review and approval. Finally, the Board seeks comments regarding the proposal to prohibit such gifts, including on the impact on City agencies having to pay for all City business travel using their City budgets.

For City Agencies:

The Board seeks information about the City purposes for which City agencies are accepting gifts of travel and travel-related expenses Board Rules Section 1-01(h), the amount of travel conducted using such gifts on an annual basis, and the impact on government functions if City agencies were required to pay for all official travel using their City agency budgets. In addition, the Board wishes to understand the impact on City agencies were such gifts to be subject to additional limitations, including public reporting and/or limitations on the City purposes of such gifts, the donors of such gifts, the public servants who may accept such gifts, the geographic locations of the travel, or additional procedures for review and approval. The Board seeks to make the most informed decision possible in its evaluation of the ongoing merits of the exception to permit the acceptance of gifts of travel and travel-related expenses, so it calls on City agencies to provide as much detail and context as possible to determine whether this exceptions is, in fact, necessary to retain for important agency operations.

**Statement of Basis and Purpose**

The Conflicts of Interest Board proposes to amend its rules to add a public reporting requirement when City agencies accept payment by a third party for travel-related expenses, such as airfare, ground transportation, hotel accommodations, meals,

and conference fees. The Board also proposes conforming edits to implement this new requirement and additional technical edits.

### *Reporting of Travel-Related Expenses*

Board Rules Section 1-01(h) permits, in certain circumstances, the acceptance of travel-related expenses paid by a third party for official City business. The Board proposes to add the requirement that City agencies report any such expenses of \$1,000 or more along with the name and title of the public servant who traveled, the event necessitating travel, and the date(s) and location of the event. Because City agencies must already collect this information to obtain agency-head approval under Section 1-01(h), this new reporting requirement would impose only a minimal administrative burden.

The Board proposes to add this new reporting requirement for several reasons. When the Board last amended Board Rules Section 1-01(h) in 2020, Reinvent Albany testified about the potential for corruption or abuse in permitting the acceptance by public servants of travel-related expenses non-governmental entities. The Board recognizes that the acceptance by public servants of gifts of substantial value warrants increased transparency. In addition, other large cities such as San Francisco and Chicago mandate public disclosure for travel-related expenses paid for by third parties. The information reported may inform future Board rulemaking.

### *Conforming and Technical Edits*

The Board proposes to create a new section, proposed Board Rules Section 1-19, to consolidate the existing reporting requirements for donations to the City (Board Rules Section 1-14(c)(1)) and the new reporting requirement for gifts to the City of travel-related

expenses into a single reporting rule. In so doing, the Board aims to make these requirements as consistent and simple as possible.

To that end, the Board proposes to set the reporting threshold in the new Board Rules Section 1-19 for both donations to the City and gifts of travel-related expenses at \$1,000. This change lowers the current reporting threshold of \$5,000 in Board Rules Section 1-14(c)(1) so that it is consistent with the reporting threshold in the Annual Disclosure Law (Administrative Code Section 12-110(d)(1)(h)(2)). The proposed amendments also include legal cross-references to guide public servants.

In consolidating these reporting requirements, the Board also proposes to eliminate the requirement, currently contained in Board Rules Section 1-14(c)(2), that an agency report the names of not-for-profit organizations that were beneficiaries of fundraising by agency employees, a report of limited utility to meet the transparency aims of the rule.

The proposed amendments to Board Rules Section 1-01(h) would clarify the meaning of “travel-related expenses” by adding a list of examples and a reference to Comptroller’s Directive No. 6 as defining government-class travel. Finally, the proposed amendments would require that agency-head approval of their employees’ travel pursuant to Board Rules Section 1-01(h) must be in writing. This requirement, although identified in the Statement of Basis and Purpose, was inadvertently omitted in 2020 from the Board’s adopted rule.

The proposed amendments do not replace or eliminate the current requirement of Administrative Code § 12-110(d)(1)(h)(2) that annual financial disclosure filers report the receipt of travel-related expenses from a third party of \$1,000 or more.

## Text of Proposed Rule

New material is underlined.

[Deleted material is bracketed.]

Asterisks (\*\*\*) indicate unamended text.

**Section 1.** Paragraphs (1) and (3) of subdivision (h) of section 1-01 of Title 53 of the Rules of the City of New York are amended to read as follows:

- (1) For the purposes of Charter § 2604(b)(3) and Charter § 2604(b)(5), 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;
  - (ii) [the] travel-related expenses, including but not limited to airfare, ground transportation, hotel accommodations, and meals, are consistent with government-class travel as set forth in Comptroller's Directive No. 6 [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 a person or firm has no particular matter involving that person or firm pending before the public servant.

Reminder: Annual financial disclosure filers must report any travel-related expenses of \$1,000 or more that they receive from a third party, as required by Administrative Code § 12-110(d)(1)(h)(2).

\* \* \*

- (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.** Section 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;
- (ii) another City agency or office designated by the public servant's agency head, with the [written] approval of the head of the other agency or office;
- (iii) a not-for-profit organization subject to Chapter 9 of Title 3 of the Administrative Code over which the public servant's agency head exercises control as part of [his or her] their City position;
- (iv) a not-for-profit organization designated by the public servant's agency head pursuant to subdivision (b) of this section, provided that the public servant is not associated, within the meaning of Charter Section 2601(5), with the organization or an employee of the organization.

(2) The solicitation is directed either to the general public or to [an individual] a person or firm that does not have a particular matter pending before the public servant.

(3) The solicitation is accompanied by a disclaimer that a contribution will not affect any business dealings with the City or provide special access to City officials.

(b) An agency head may designate [in writing] one or more not-for-profit organizations for solicitations made by agency or office employees pursuant to subdivision (a) of this section, provided that both of the following conditions are met:

- (1) the not-for-profit organization has a clear and direct nexus to the City and its residents and with the mission or duties of the City agency or office; and
- (2) the agency head is not associated, within the meaning of Charter Section 2601(5), with the organization or an employee of the organization.

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

(1) 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; and

(2) the name of any not-for-profit organization designated by the agency head pursuant to subdivision (b) of this section for which agency employees solicited donations during the previous calendar year.

(d) An agency head may submit to the Board a written request that disclosure, pursuant to subdivision (c)(1) of this section, of one or more of its donors and/or the amount of donation not be made public. The written request must be submitted no later than January 31 for the previous calendar year and must explain why the release of such information to the public may cause harm, threats, harassment, or reprisals to the donor or to individuals or property affiliated with the donor. Whether or not an agency head has submitted a request pursuant to this subdivision, the Board may on its own initiative grant privacy as to any information submitted by an agency head, upon a finding by the Board that the release of such information would pose a risk to the safety or security of any person.

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

**Section 3.** Title 53 of the Rules of the City of New York is amended by adding a new section 1-19, to read as follows:

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

(a) For the purposes of Charter § 2604(b)(2), each agency head must report to the Board annually by February 28 the following information for the previous calendar year:

(1) the name of any person or firm that made one or more gifts to the agency totaling \$1,000 or more, the total dollar value of any such gifts, and whether any such gifts were cash, in-kind, or payment of travel-related expenses stated in § 1-01(h)(ii).

(2) For any reported payment of travel-related expenses pursuant to subdivision (1), the agency head must also report: the name and title of the public servant(s) who traveled; the event(s) necessitating travel; and the date(s) and location(s) of the event(s).

(b) An agency head may request in writing that the Board withhold from public disclosure the name of a donor and/or the value of their donation. This request must be submitted no later than January 31 for the previous calendar year and must explain why disclosure may result in harm, threats, harassment, or reprisals to the donor or to affiliated persons or property. Whether or not an agency head has submitted such a request, the Board may on its own initiative withhold such information if it finds that disclosure would pose a risk to the safety or security of any person.

**NEW YORK CITY MAYOR'S OFFICE OF OPERATIONS  
253 BROADWAY, 10<sup>th</sup> FLOOR  
NEW YORK, NY 10007  
212-788-1400**

**CERTIFICATION / ANALYSIS  
PURSUANT TO CHARTER SECTION 1043(d)**

**RULE TITLE: Amendment of Rules Relating to Acceptance and Reporting of Donations**

**REFERENCE NUMBER: COIB-30**

**RULEMAKING AGENCY: Conflicts of Interest Board**

I certify that this office has analyzed the proposed rule referenced above as required by Section 1043(d) of the New York City Charter, and that the proposed rule referenced above:

- (i) Is understandable and written in plain language for the discrete regulated community or communities;
- (ii) Minimizes compliance costs for the discrete regulated community or communities consistent with achieving the stated purpose of the rule; and
- (iii) Does not provide a cure period because it does not establish a violation, modification of a violation, or modification of the penalties associated with a violation.

/s/ Francisco X. Navarro  
Mayor's Office of Operations

July 22, 2025  
Date

**NEW YORK CITY LAW DEPARTMENT  
DIVISION OF LEGAL COUNSEL  
100 CHURCH STREET  
NEW YORK, NY 10007  
212-356-4028**

**CERTIFICATION PURSUANT TO  
CHARTER §1043(d)**

**RULE TITLE:** Amendment of Rules Relating to Acceptance and Reporting of Donations

**REFERENCE NUMBER:** 2025-RG-054

**RULEMAKING AGENCY:** Conflicts of Interest Board

I certify that this office has reviewed the above-referenced proposed rule as required by section 1043(d) of the New York City Charter, and that the above-referenced proposed rule:

- (i) is drafted so as to accomplish the purpose of the authorizing provisions of law;
- (ii) is not in conflict with other applicable rules;
- (iii) to the extent practicable and appropriate, is narrowly drawn to achieve its stated purpose; and
- (iv) to the extent practicable and appropriate, contains a statement of basis and purpose that provides a clear explanation of the rule and the requirements imposed by the rule.

/s/ STEVEN GOULDEN  
Senior Counsel

Date: July 21, 2025