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**1 Liberty Plaza**  
**11<sup>th</sup> Floor**  
**New York, NY 10006**

Sent via email

February 3, 2026

Ethan Carrier – ECarrier@coib.nyc.gov  
Conflicts of Interest Board  
2 Lafayette Street, Suite 1010  
New York, New York 10007

Re: Consulting Arrangement with former Executive Director Mary Moultrie

Dear Mr. Carrier,

As permitted under the Conflicts of Interest Board (“COIB”) Rule §1-07(d), I am writing to notify you that Mary Moultrie (also known as Lynn Roberts), former Executive Director of the New York City (“NYC” or “City”) Department of Small Business Services (“SBS” or “Agency”), will continue as a consultant for SBS in order to provide her experience and assistance on continuing matters handled during or related to her City tenure. Ms. Moultrie retired from the City on January 30, 2026. SBS anticipates the consultancy arrangement to last until August 9, 2026. The corresponding consulting contract will conform to the stipulations detailed in the City Charter and will be executed between Ms. Moultrie and SBS.

Under COIB Rule 1-07(d)(1), a public servant may continue to serve as a compensated consultant to the agency they were formerly employed by and work on matters they were personally and substantially involved with at their former agency so long as the following conditions are met:

- i. The consulting arrangement is made for the purpose of continuing or completing work left unfinished by the former public servant at the time their City service terminated, or for training their replacement, or for filling a vacancy until a replacement can be hired;
- ii. The duration of the consulting arrangement is no longer than reasonably necessary;
- iii. The former public servant has technical, professional, or other subject-matter expertise or skills not otherwise available among the agency’s employees;
- iv. The compensation is comparable to what the former public servant last earned at the agency; and
- v. Within 30 days the written approval of the agency head is disclosed to the Conflicts of Interest Board, which approval will be posted on the Board’s website.

Mary Moultrie has worked in the Energy Cost Savings Program (“ECSP”) for over 31 years. ECSP is an incentives program managed by SBS that can reduce regulated electricity costs up to 45% and regulated natural gas costs up to 35% for eligible businesses that make commitments to grow and/or expand operations within NYC. The benefits associated with ECSP can last for up to 12 years with eight years of full benefits followed by a four-year phase-out during which benefits are decreased by

20% per year. Due to the longevity of the benefit and the monthly reconciliation that needs to be completed, this is a very technical program that requires a high level of management. Due to Ms. Moultrie's decades of experience with the ESCP, she is uniquely qualified to provide knowledge, expertise and guidance on the ESCP not otherwise available at the agency.

SBS is in the process of migrating our legacy database into a new data system, Dynamics. Due to the 12-year duration of the ESCP benefit, not including the option to renew, there are thousands of businesses and benefits tracked in the database. The migration will be broken up into multiple phases. Phase 1 is almost complete and will be deployed shortly. Ms. Moultrie will be instrumental in the subsequent phases, including the development of the new system's modules and functions, which will require a high-level understanding of all the steps and processes involved in reconciling reports from utility companies with information from businesses in the ESCP. While other SBS staff may grasp some steps, Ms. Moultrie's knowledge is crucial to ensuring the overall functionality and compatibility of the new system to the ESCP's needs.

The Agency is preparing to search for and hire a new Executive Director in the coming months. Ms. Moultrie's assistance will be key to onboarding and training the new Executive Director to ensure continuity in the ESCP. Not including Ms. Moultrie, ESCP is currently staffed by six employees. Of these six employees, five employees are eligible for retirement this year, so the Agency is working to transition work and knowledge to the remaining staff and the new Executive Director. Ms. Moultrie's continued work as a consultant during this time is essential to ensure the continuity of the ESCP and to continue to transfer information and knowledge to the Agency.

Ms. Moultrie will continue to provide institutional knowledge and guidance to SBS staff, as needed through August 9, 2026. It is expected that Ms. Moultrie will provide her services approximately 10-20 hours per week, capped at 435 hours. The duration of her consultancy is reasonable considering the matters she will continue to assist with are still ongoing and may take at least a year to close out. Ms. Moultrie will continue to be compensated at the rate of \$80.35 per hour, which is commensurate with her \$140,806 annual salary at the time her tenure at SBS ended.

For the reasons above, the Agency will continue to retain Ms. Moultrie as a consultant pursuant to COIB Rule Section 1-07(d)(1).

If you have any questions, please do not hesitate to contact me at 212-513-6448 or at [clai@sbs.nyc.gov](mailto:clai@sbs.nyc.gov).

Sincerely,

Christine Lai  
Senior Counsel

Agency Head Approval:



Dynishaal Cross  
Commissioner

cc: Anthony Dell'Olio (via email: [ADellolio@sbs.nyc.gov](mailto:ADellolio@sbs.nyc.gov))  
Chris Hammer (via email: [CHammer@coib.nyc.gov](mailto:CHammer@coib.nyc.gov))