

March 18, 2021

New York City Conflicts of Interest Board  
2 Lafayette Street  
Suite 1010  
New York, NY 10007

Dear Conflicts of Interest Board Members:

In accordance with the Conflicts of Interest Board (C.O.I.B.) Rule 1-13 (e), I write to inform you that I hereby designate Lorelei Salas, Commissioner of the Department of Consumer and Worker Protection (DCWP)<sup>1</sup> to become a member of *Decent Work Cities Network* (DWCN), an international organization among cities that promote leading labor policies in job and labor fields around the globe.

For the past three years, Commissioner Salas or her designee, has attended an annual conference held by DWCN, “International Forum on Transforming Cities for Decent Work,” in Seoul, South Korea as a representative for the Mayor, along with those holding similar positions from other cities from around the world. DWCN is now transitioning from a conference model to a membership model where membership at the general assembly is being extended to cities which have participated at the conferences. In keeping with this transition, Commissioner Salas is now being asked to participate in future conferences as a *Member* (as opposed to an attendee) wherein she will have an active role in creating the agenda at the annual conference and work with other Members to develop a “Decent Work City Labor Model.” To achieve this, Commissioner Salas will share best practices in job and labor policies with other member cities. DWCN’s Operational Regulations will not be legally construed as obligations and shall not be legally binding to the member cities.<sup>2</sup>

Commissioner Salas will not be compensated once she is a Member but will use reasonable and incidental City time and City resources when preparing for each annual meeting she is involved in as described above. Commissioner Salas will not seek funding from or do lobbying directed at any NYC or NYS legislative or elected officials / entities.

Commissioner Salas meets the criteria delineated by Board Rule 1-13(e)(1)(i-iii) which applies to designations for work on behalf of not-for-profits or similar entities such as DWCN. It instructs:

(e) (1) An agency head may designate a public servant to perform work on behalf of a not-for-profit corporation, association, or other such entity that operates on a not-for-profit basis, including serving as a board member or other position with fiduciary responsibilities provided that:

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<sup>1</sup> This reflects the agency’s new name which will be official through pending legislation.

<sup>2</sup> Please see the attached documents (Introduction to Decent Work City Network (DWCN), Sign up Guide for Membership to DWCN and a letter from the City of Seoul to Mayor de Blasio) which explain membership.

(i) there is a demonstrated nexus between the proposed activity, the public servant's City job, and the mission of the public servant's agency; and such work furthers the agency's mission and is not undertaken primarily for the benefit or interests of the not-for-profit;

(ii) the designated public servant takes no part in the entity's business dealings with the City at the entity or at his or her agency, except that Council Members may sponsor and vote on discretionary funding for the entity; and,

(iii) within thirty (30) days the written designation is disclosed to the Conflicts of Interest Board and will be posted on the Board's website.

With respect to the first subsection, "i", there is a demonstrated nexus between Commissioner Salas obtaining *Decent Work City Network* membership and her City job and the mission of her agency, DCWP. Moreover, the work she will perform as Member will further the agency's mission and not be undertaken primarily for the benefit of the DWCN. This is best illustrated through DCWP's role in enforcing key NYC workplace regulations for workers through its Office of Labor and Policy Standards. This Division is NYC's central resource for workers and a dedicated voice for workers in City government. Commissioner Salas' membership in DWCN will further the mission of DCWP by ensuring NYC labor standards and policies are seen on a national platform, where New York can be used as a model for other cities worldwide to create fair workplace laws. Clearly, this membership would not be accepted primarily for the benefit of DWCN, but rather to expand the mission of DCWP. Commissioner Salas' role as a Member will, in fact, be complementary to her role at DCWP and will further the purposes and interests of the City as it sets the example for other cities across the globe to follow its lead.

With respect to the second requirement, "ii", neither the agency nor the Commissioner will take part in any business dealings with DWCN. In the same vein, DWCN is not seeking any prospective business dealings with DCWP or the City.

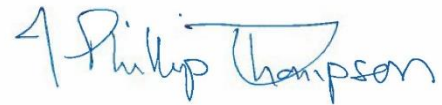
Lastly, with respect to the third requirement, "iii", if the Commissioner is accepted as a Member for *Decent Work City Network*, she will disclose it to the Conflicts of Interest Board (COIB) within thirty (30) days.

Based on the information presented to me, I have determined that there is a demonstrated nexus between the mission of DCWP, Commissioner Salas' job and the work and activities performed by DWCN, and that such work and activities would further DCWP's mission and is not undertaken primarily for the benefit of DWCN.

I have been advised that Commissioner Salas does not anticipate or foresee any conflicts between the day-to-day responsibilities at DCWP and involvement with DWCN. I am supportive of Commissioner Salas serving in this role as a Member of DWCN, subject to any required stipulations and/or recusals on her

part, I am also requesting that Commissioner Salas be allowed reasonable and incidental use of City time and resources for her participation with DWCN as part of her duties.

Sincerely,

A handwritten signature in blue ink that reads "J. Phillip Thompson". The signature is written in a cursive style with a large initial "J" and a prominent horizontal line above the "P".

J. Phillip Thompson  
Deputy Mayor for Strategic Policy Initiatives

cc: