



New York City Campaign Finance Board

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October 25, 2024

Milton L. Williams, Jr.
Board Chair
New York City Conflicts of Interest Board
2 Lafayette Street, Suite 1010
New York, NY 10007

RE: Daniel Cho/Campaign Finance COIB Rule 1-13(e) Designation

Dear Mr. Williams:

Pursuant to COIB Rule 1-13(e)(1)(iv), this correspondence is an official disclosure of the Campaign Finance Board's (CFB) designation of employee Daniel Cho as a public servant permitted to perform work on behalf of the nonprofit organization the Council on Governmental Ethics Laws (COGEL), of which the CFB is an organizational member. With such designation, Mr. Cho will be allowed reasonable and incidental use of City time and resources for his work with COGEL as part of his CFB duties.

Mr. Cho is the Assistant Executive Director (AED) of Candidate Guidance and Policy at the CFB. His duties include serving on the Executive team and managing policies and procedures that affect candidates and their campaign staff in complying with the Campaign Finance Act and Board Rules. Mr. Cho also oversees communications and advice related to campaign financial disclosures and the public matching funds program.

As agency head, pursuant to COIB Rule 1-13(e), I am designating Mr. Cho as a public servant permitted to perform work as the 2024 president of the COGEL board of directors. COGEL is a nonprofit with the primary purpose of facilitating and promoting the exchange and dissemination of information on governmental ethics. To this end, COGEL holds an annual conference and related committee meetings to inform members and the general public about developments in state, federal, and international ethics laws and legislation. COGEL also maintains a website to keep members and the public aware of legislative developments in ethics laws and related areas. Furthermore, COGEL produces and distributes various publications and periodicals designated to educate the public and media about the legislative process and ethics in the law. One of COGEL's primary issue areas is campaign finance law. COGEL's other issue areas include laws and regulations concerning elections, ethics, freedom of information, and lobbying, all of which are directly or indirectly related to CFB's mission and operations.

As president, Mr. Cho leads the COGEL board of directors, which provides strategic direction for the organization to ensure its continued growth and development. The COGEL board also generates all operational policy, procedures, and related matters affecting the organization and provides oversight of COGEL committees to ensure all facets of the organization are working toward a shared vision and goals while representing the voices of all stakeholders. Mr. Cho would not be involved in any business dealings between the CFB and COGEL.

As provided by COIB Rule 1-13(e)(1), the three conditions to consider are as follows:

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

First, there is a demonstrated nexus between the proposed work, Mr. Cho's role as AED of Candidate Guidance and Policy, and the CFB's mission. The CFB's mission is to make our local democracy more open, transparent, and equitable. The CFB seeks to eliminate barriers to civic participation by providing access to the information and resources New Yorkers need to vote or run for office and reducing the corrupting influence of money in politics by enhancing the impact of New Yorkers' small-dollar contributions. As stated above, in his role as AED of Candidate Guidance and Policy, Mr. Cho oversees communications and advice related to campaign financial disclosures and the public matching funds program. His work as COGEL president is clearly aligned with his City work and the CFB's mission, insofar as both the CFB and COGEL aim to educate stakeholders and the general public on laws relating to campaign finance. The annual COGEL conference (which Mr. Cho serves a key role in organizing) is an important forum for CFB staff to learn about best practices and new developments in campaign finance and, more generally, government ethics.

Second, Mr. Cho's work as COGEL president furthers the CFB's mission and is not undertaken primarily for the benefit or interests of COGEL. By providing executive direction to COGEL, Mr. Cho ensures the smooth operation of an organization that provides invaluable knowledge and connections to the CFB. Given the alignment between the CFB's and COGEL's interests, there is no risk of subordination of the CFB's mission to COGEL's benefit or interests.

Third, Mr. Cho takes no part in COGEL's business dealings with the City or the CFB, such as paying membership dues.

I believe that Mr. Cho's work complies with all provisions of COIB Rule 1-13(e) and does not violate any other provisions of Chapter 68 of the City Charter or COIB Rules. Per COIB Rule 1-13(e)(1)(iv), this letter serves as official disclosure to COIB of Mr. Cho's written designation.

Sincerely,

Paul S. Ryan

Paul S. Ryan
Executive Director
NYC Campaign Finance Board
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cc: Jason Yee, Senior Counsel (CFB)
Ethan Carrier, General Counsel (COIB)
Chris Hammer, Deputy General Counsel (COIB)