

CITY OF NEW YORK CONFLICTS OF INTEREST BOARD

2 Lafayette Street, Suite 1010
New York, New York 10007
(212) 442-1400; (212) 437-0705 (Fax)
www.nyc.gov/ethics

December 8, 2025

Chancellor Melissa Aviles-Ramos
New York City Department of Education
52 Chambers Street, Room 308
New York, New York 10007

Re: Conflicts of Interest Board Case No. 2025-781 (Christina Foti)

Dear Chancellor Aviles-Ramos:

This is in response to your letter to the Conflicts of Interest Board (the "Board"), dated October 28, 2025, and additional communications between your agency and Board staff, designating, pursuant to Board Rules Section 1-13(e)(1), New York City Department of Education ("DOE") employee Christina Foti to use City time and City resources to perform work for Special Olympics New York ("SONY"), and requesting a determination by the Board, pursuant to Board Rules Section 1-13(e)(2), that Ms. Foti may take part in SONY's business dealings with the City.

Relevant Facts

You advise that at DOE Ms. Foti is Deputy Chancellor of the Division of Inclusive and Accessible Learning. She leads and sets policy for DOE's efforts to provide high-quality programs for students with disabilities and English language learners. She oversees District 75, DOE's special education school district, and supervises DOE staff who are directly involved with SONY's business dealings with DOE.

You further advise that you have designated Ms. Foti to serve as a member of the board of directors of SONY. SONY is a not-for-profit organization that provides year-round sports training and athletic competition in Olympic-style sports for children and adults with intellectual disabilities. SONY offers the Unified Champion Schools program, which brings together students with and without intellectual disabilities as teammates at participating schools across New York State; approximately 44 DOE schools participate in this program.

You advise that as a board member of SONY Ms. Foti would participate in quarterly board meetings to set the budget, develop policies and procedures, and oversee the effective management of the organization in partnership with the President and CEO and executive staff. Additionally, as a member of SONY's Executive Evaluation and Planning

Committee, she would review the performance and set the compensation of SONY's President and CEO. Ms. Foti's participation on the board of directors of SONY would help DOE create greater access to high-quality athletics programming for DOE students with intellectual disabilities.

By your letter to the Board, you approve of Ms. Foti's work on behalf of SONY as part of her work for DOE and seek the Board's approval for her participation in business dealings between SONY and the City, stating your belief that such work furthers DOE's mission and is not undertaken primarily for the benefit or interests of SONY.

Relevant Law

Charter Section 2604(b)(2), as interpreted in Board Rules Section 1-13, prohibits a public servant's use of City time or City resources for non-City purposes.

Board Rules Section 1-13(e) provides that a deputy mayor may designate an agency head 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: (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 their agency; and (iii) within 30 days the written designation is disclosed to the Board and will be posted on the Board's website.

A public servant designated pursuant to Board Rules Section 1-13(e)(1) may take part in the entity's business dealings with the City at the entity and/or at their agency if, after written approval of the agency head, the Board determines that there is a demonstrated nexus between the proposed participation, the public servant's City job, and the mission of the public servant's agency; and that such participation furthers the agency's mission and is not undertaken primarily for the benefit or interests of the not-for-profit entity. See Board Rules Section 1-13(e)(2).

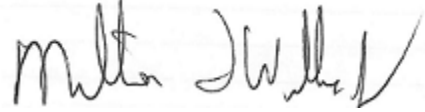
Advice

The Board has determined, based on the above representations and your written approval, that there is a demonstrated nexus between Ms. Foti's work at DOE, her work for SONY, and the mission of DOE. The Board has also determined that Ms. Foti's participation in the business dealings between the City and SONY furthers DOE's mission. Accordingly, Ms. Foti may use City time and City resources to perform work for SONY and may be involved in business dealings between SONY and the City. See Board Rules Section 1-13(e)(2).

The advice conveyed in this letter is conditioned on the correctness and completeness of the facts supplied to us. If such facts are in any respect incorrect or

incomplete, the advice we have given to you may not apply. If at any time you would like further advice based on a change of circumstances or additional information, please contact us.

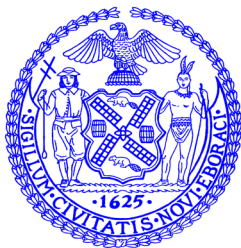
Very truly yours,

A handwritten signature in black ink, appearing to read "Milton L. Williams Jr.", with a stylized flourish at the end.

Milton L. Williams Jr.
Chair

cc: Wayne G. Hawley
Ifeoma Ike
Amy E. Millard

Samantha M. Biletsky
Daisy Garay
Christina Foti



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December 8, 2025

Chancellor Melissa Aviles-Ramos
New York City Department of Education
52 Chambers Street, Room 308
New York, New York 10007

Re: Conflicts of Interest Board Case No. 2025-782 (Kevin Moran)

Dear Chancellor Aviles-Ramos:

This is in response to your letter to the Conflicts of Interest Board (the "Board"), dated October 28, 2025, designating, pursuant to Board Rules Section 1-13(e)(1), New York City Department of Education ("DOE") employee Kevin Moran to use City time and City resources to perform work for New York City School Bus Umbrella Services ("NYCSBUS") and New York City School Support Services ("NYCSSS"), and requesting a determination by the Board, pursuant to Board Rules Section 1-13(e)(2), that Mr. Moran may take part in the business dealings between NYCSBUS and NYCSSS and the City.

Relevant Facts

You advise that at DOE Mr. Moran is Deputy Chancellor of Operations. He oversees high-level strategy for the Office of Contracts & Purchasing, the Office of Instructional and Informational Technology, the Office of School Health, and School Operations, which consists of the Office of Pupil Transportation, the Office of Food and Nutrition Services, the Office of School Facilities, the Office of Emergency Management, and the Office of Space Management.

You further advise that you have designated Mr. Moran to serve on your behalf as Chair of the board of directors of NYCSBUS, a not-for-profit organization created by the City to provide yellow bus service for DOE schools. NYCSBUS has over 1,500 employees, including school bus drivers, school bus attendants, mechanics, and support staff, who transport approximately 10,000 students City-wide. The City is the primary source of NYCSBUS capital. The DOE Chancellor chairs the NYCSBUS board of directors, which consists of five voting members, including the DOE Chancellor and the Director of the New York City Office of Management and Budget ("OMB") serving *ex officio* and three members appointed by the DOE Chancellor. As Chair, Mr. Moran would attend quarterly board meetings, provide general and financial oversight to NYCSBUS leadership, approve certain contracts, the annual audit, and financial statements

submitted to the New York City Comptroller's Office. As Deputy Chancellor of Operations, Mr. Moran oversees the Office of Pupil Transportation, which manages the contract between DOE and NYCSBUS.

You advise that you have also designated Mr. Moran to serve on your behalf as Chair of the board of directors of NYCSSS, a not-for-profit organization created by the City to employ custodial helpers and provide staffing to DOE schools. NYCSSS employs approximately 7,500 custodial helpers who work in DOE school buildings. The City is the sole source of NYCSSS capital. The DOE Chancellor chairs the NYCSSS board of directors, which consists of five voting members, including the DOE Chancellor and the OMB Director serving *ex officio* and three members appointed by the DOE Chancellor. As Chair, Mr. Moran would attend quarterly board meetings, provide general and financial oversight to leadership at NYCSSS, and approve certain contracts, the annual audit, and financial statements submitted to the Comptroller's Office. As Deputy Chancellor of Operations, Mr. Moran oversees the Division of School Facilities, the office to which all custodial helpers report, and the Office of Contracts & Purchasing, which manages the contract between DOE and NYCSSS.

By your letter to the Board, you approve of Mr. Moran's work on behalf of NYCSBUS and NYCSSS as part of his work for DOE and seek the Board's approval for his participation in business dealings between NYCSBUS and NYCSSS and the City, stating your belief that such work furthers DOE's mission and is not undertaken primarily for the benefit or interests of NYCSBUS or NYCSSS.

Relevant Law

Charter Section 2604(b)(2), as interpreted in Board Rules Section 1-13, prohibits a public servant's use of City time or City resources for non-City purposes.

Board Rules Section 1-13(e) provides that a deputy mayor may designate an agency head 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: (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 their agency; and (iii) within 30 days the written designation is disclosed to the Board and will be posted on the Board's website.

A public servant designated pursuant to Board Rules Section 1-13(e)(1) may take part in the entity's business dealings with the City at the entity and/or at their agency if, after written approval of the agency head, the Board determines that there is a demonstrated nexus between the proposed participation, the public servant's City job, and the mission of the public servant's agency; and that such participation furthers the

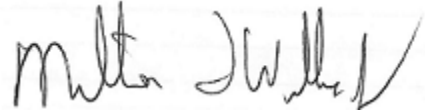
agency's mission and is not undertaken primarily for the benefit or interests of the not-for-profit entity. See Board Rules Section 1-13(e)(2).

Advice

The Board has determined, based on the above representations and your written approval, that there is a demonstrated nexus between Mr. Moran's work at DOE, his work for NYCSBUS and NYCSSS, and the mission of DOE. The Board has also determined that Mr. Moran's participation in the business dealings between the City and NYCSBUS and NYCSSS furthers DOE's mission. Accordingly, Mr. Moran may use City time and City resources to perform work for NYCSBUS and NYCSSS and may be involved in business dealings between NYCSBUS and NYCSSS and the City. See Board Rules Section 1-13(e)(2).

The advice conveyed in this letter is conditioned on the correctness and completeness of the facts supplied to us. If such facts are in any respect incorrect or incomplete, the advice we have given to you may not apply. If at any time you would like further advice based on a change of circumstances or additional information, please contact us.

Very truly yours,

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Chair

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