

CITY OF NEW YORK CONFLICTS OF INTEREST BOARD

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December 8, 2025

Camille Joseph Varlack
Deputy Mayor for Administration and Chief of Staff
Office of the New York City Mayor
City Hall
New York, New York 10007

Re: Conflicts of Interest Board Case Nos. 2025-780/a
(DeShanna Alexander and Luis Martinez)

Dear Deputy Mayor Varlack:

This is in response to your letter to the Conflicts of Interest Board (the "Board"), dated October 24, 2025, designating, pursuant to Board Rules Section 1-13(e)(1), DeShanna Alexander and Luis Martinez to use City time and City resources to perform work for the Mayor's Fund to Advance New York City (the "Fund"), and requesting a determination by the Board, pursuant to Board Rules Section 1-13(e)(2), that they may take part in the Fund's business dealings with the City.

Relevant Facts

You advise that at the Mayor's Office Ms. Alexander is the Chief Human Resources Officer and Deputy Chief Administrative Officer, leading a team of human resources, payroll, information technology, and financial services professionals to execute agency administrative and strategic operations. Mr. Martinez is a Senior Advisor to the Deputy Mayor for Administration, coordinating the City's uniformed and public safety agencies and advising you on strategy and performance management for Citywide operations. He also directs the City Hall emergency team, managing interagency response during emergencies and extreme weather events.

You further advise that Ms. Alexander and Mr. Martinez serve as members of the board of directors of the Mayor's Fund, with Ms. Alexander also serving as the board's Secretary. The Fund is a not-for-profit organization created by the City that facilitates public-private partnerships between the City and the private sector and serves as a vehicle for foundations, corporations, and individuals to contribute to City programs and initiatives. The Fund is governed by a board of directors, each of whom is appointed by the Mayor, and is responsible for managing the affairs and property of the Mayor's Fund, including approving the budget and contracts and employing personnel. The Fund has

registered with the Board as a not-for-profit organization affiliated with an elected official under Chapter 9 of Title 3 of the New York City Administrative Code. As board members, Ms. Alexander and Mr. Martinez would be involved in the business dealings between the Mayor's Fund and the City, such as amendments to the Fund's contract with the City.

By your letter to the Board, you approve of Ms. Alexander's and Mr. Martinez's work on behalf of the Fund and their participation in the Fund's business dealings with the City.

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 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: (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).

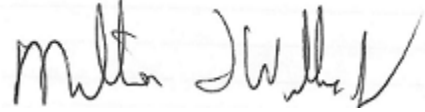
Advice

The Board has determined, based on the above representations and your written approval, that there is a demonstrated nexus between Ms. Alexander's and Mr. Martinez's work for the Mayor's Office, their work for the Fund, and the mission of the Fund. The Board has also determined that their participation in the business dealings between the City and the Fund furthers the mission of the Mayor's Office. Accordingly, Ms. Alexander and Mr. Martinez may use City time and City resources to perform work for the Fund and may be involved in business dealings between the Fund 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

Bill Heinzen
DeShanna Alexander
Luis Martinez