



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

February 18, 2025

Maria Torres-Springer
First Deputy Mayor
Office of the New York City Mayor
City Hall
New York, New York 10007

Re: Conflicts of Interest Board Case No. 2025-066 (Lisa Bova-Hiatt)

Dear First Deputy Mayor Torres-Springer:

This is in response to the New York City Housing Authority's ("NYCHA") submission to the Conflicts of Interest Board (the "Board"), received December 11, 2024, designating, pursuant to Board Rules Section 1-13(e)(1), NYCHA Chief Executive Officer Lisa Bova-Hiatt to use City time and City resources to perform work for the Fund for Public Housing, Inc., d/b/a Public Housing Community Fund (the "Fund"), and requesting a determination by the Board, pursuant to Board Rules Section 1-13(e)(2), that Ms. Bova-Hiatt may take part in the Fund's business dealings with the City.

Relevant Facts

You advise that as Chief Executive Officer Ms. Bova-Hiatt oversees the day-to-day operations of NYCHA, directing NYCHA's business and affairs and the execution of all policies, resolutions, motions, rules, and regulations; makes, issues, and promulgates official orders, rules, and regulations for the conduct, management, and operation of NYCHA; and appoints and removes all executive-level officers.

The Board is advised that NYCHA established the Fund in 2016 to improve the City's public housing and connect NYCHA residents with services to advance their economic opportunities, health, education, and well-being. Because of its affiliation with NYCHA, the Fund has registered as a not-for-profit organization affiliated with an elected official under Chapter 9 of Title 3 of the New York City Administrative Code.

The Board is advised that NYCHA's Chief Executive Officer and two additional NYCHA employees or board members designated by the Chief Executive Officer serve as *ex-officio* members on the board of directors of the Fund, which approves contracts of \$1 million or more; approves of board committee charters, the Fund's advisory board, and any advisory board subcommittee; and adopts the Fund's annual budget. As a board

member, Ms. Bova-Hiatt must take part in the Fund's dealings with the City. Ms. Bova-Hiatt selected Ms. Lescott-Martinez and Ms. Busgith to be NYCHA's two *ex-officio* representatives on the Fund's board of directors. The Board approved Ms. Lescott-Martinez's and Ms. Busgith's work on behalf of the Fund and their participation in the Fund's business dealings with the City (COIB Case Nos. 2025-066a & 2025-066b).

By your endorsement of NYCHA's submission to the Board, you approve of Ms. Bova-Hiatt work on behalf of the Fund as part of her work for NYCHA and seek the Board's approval for her participation in business dealings between the Fund and 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 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.

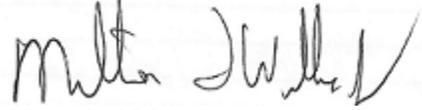
A public servant designated pursuant to Board Rules Section 1-13(e)(1) may take part in the entity's business dealings with the City at the entity and/or at their agency if, after written approval of the agency head, the Board determines that there is a demonstrated nexus between the proposed participation, 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. Bova-Hiatt's work at NYCHA, her work for the Fund, and the mission of NYCHA. The Board has also determined that Ms. Bova-Hiatt's participation in the business dealings between the City and the Fund furthers NYCHA's mission. Accordingly, Ms. Bova-Hiatt 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.

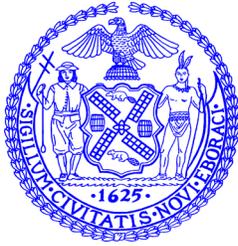
Very truly yours,

A handwritten signature in black ink, appearing to read "Milton L. Williams Jr.", written over a light blue horizontal line.

Milton L. Williams Jr.
Chair

cc: Wayne G. Hawley
Ifeoma Ike
Amy E. Millard
Georgia M. Pestana

Bill Heinzen
Alexander Yellen
Lisa Bova-Hiatt



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February 18, 2025

Lisa Bova-Hiatt
Chief Executive Officer
New York City Housing Authority
90 Church Street
New York, New York 10007

Re: Conflicts of Interest Board Case Nos. 2025-066a & 2025-066b
(Annika Lescott-Martinez and Ukah Busgith)

Dear Ms. Bova-Hiatt:

This is in response to your letter to the Conflicts of Interest Board (the "Board"), received December 11, 2024, designating, pursuant to Board Rules Section 1-13(e)(1), Annika Lescott-Martinez and Ukah Busgith to use City time and City resources to perform work for the Fund for Public Housing, Inc., d/b/a Public Housing Community Fund (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 Ms. Lescott-Martinez is the Executive Vice President & Chief Financial Officer. She leads the financial planning and analysis, accounting, payroll, risk management, and investment activities of NYCHA and oversees the fiscal policy and financial performance of NYCHA and its subsidiaries. Ms. Busgith is the Executive Vice President for Community Engagement and Partnerships. She oversees the Community Engagement and Partnerships Department. The Department works to connect NYCHA residents to critical programs and services; engage residents around agency and community priorities; supports NYCHA's network of resident associations; and manages partnerships, programs, and initiatives involving economic opportunity as well as youth, senior, and social services.

The Board is advised that NYCHA established the Fund in 2016 to improve the City's public housing and connect NYCHA residents with services to advance their economic opportunities, health, education, and well-being. Because of its affiliation with NYCHA, the Fund has registered as a not-for-profit organization affiliated with an elected official under Chapter 9 of Title 3 of the New York City Administrative Code.

The Board is advised that NYCHA's Chief Executive Officer and two additional NYCHA employees or board members designated by the Chief Executive Officer serve as *ex-officio* members on the board of directors of the Fund, which approves contracts of \$1 million or more; approves of board committee charters, the Fund's advisory board, and any advisory board subcommittee; and adopts the Fund's annual budget. You designated Ms. Lescott-Martinez and Ms. Busgith to be NYCHA's two *ex-officio* representatives on the Fund's board of directors. As board members, they must take part in the Fund's dealings with the City. The Board approved your work on behalf of the Fund and participation in the Fund's business dealings with the City (COIB Case No. 2025-066).

By your letter to the Board, you approve of Ms. Lescott-Martinez's and Ms. Busgith'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).

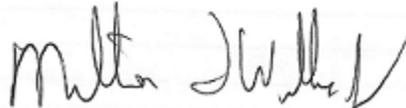
Advice

The Board has determined, based on the above representations and your written approval, that there is a demonstrated nexus between Ms. Lescott-Martinez's and Ms. Busgith's work for NYCHA, 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 NYCHA's mission. Accordingly, Ms. Lescott-Martinez and Ms. Busgith 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,

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Milton L. Williams Jr.
Chair

cc: Wayne G. Hawley
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