

**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

STEVEN BANKS
Corporation Counsel



May 6, 2026

Ethan Carrier
General Counsel
New York City Conflicts of Interest Board
2 Lafayette Street
New York, NY 10007

Re: COIB Rule 1-13(e)(1): Designation of NYC Law Department to Perform
Work with Not-for-Profit Entity

Dear Mr. Carrier:

Pursuant to Rule 1-13(e)(1) of the Rules of the Conflicts of Interest Board, I, Corporation Counsel of the City of New York, have designated Michael L. Moore, Division Chief for the Municipal Finance Division of the New York City Law Department, to perform work in his official capacity as an alternate director to the World Trade Center Captive Insurance Company (the "Company") Board of Directors (the "Board").

On February 20, 2003, the President of the United States signed the Consolidated Appropriations Resolution, 2003, Public Law 108-7, which resulted in the funding of the Company on December 3, 2004 with \$999.9 million. The Company had been incorporated on July 1, 2004 as a captive insurance company and licensed by the State of New York. The purpose of the Company was to cover the risks assumed by New York City and its hired contractors working without commercial insurance coverage, for claims resulting from work completed subsequent to the terrorist attacks on September 11, 2001 ("terrorist attacks"). The Company commenced operations upon receipt of the federally approved funding.

Pursuant to a liability insurance contract, the Company insures the City of New York and other specified parties for liability arising out of activities in or near the World Trade Center site in response to the terrorist attacks.

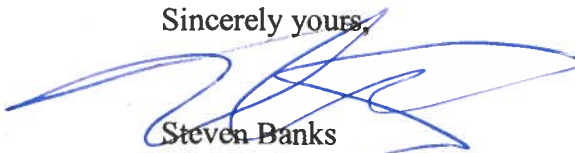
The Company has no owners. New York City is the sole member of the Company, which has been formed as a Type D corporation pursuant to Section 201 of the Not-For-Profit Corporation Law and pursuant to Chapter 188 of the Laws of 2003.

The Mayor of the City of New York appoints all directors of the Company. There are currently five members. Mr. Moore has been appointed to serve as an alternate for Jeffrey Friedlander, a member of the Board. Mr. Moore will attend and participate in meetings, and vote in Mr. Friedlander's absence.

As Chief of the Municipal Finance Division, Mr. Moore is responsible for overseeing the Division, which provides oversight and legal advice to various City agencies, including the Office of Management and Budget and the Office of the Comptroller, on the City's municipal bond programs. The Municipal Finance Division is responsible for ensuring the City's compliance with related federal, state and local laws. Division attorneys are also responsible for drafting and negotiating closing documents for new bond issuances, refunding, defeasances and other City-related bond transactions. Mr. Moore's service in the capacity described in this letter directly relates to and furthers of his role as Division Chief.

Based upon the information presented to me, I have determined that there is a demonstrated nexus between Mr. Moore's position in the Law Department and his role as a newly appointed alternate on the Company's Board, and that such activity furthers the Law Department's mission and is not undertaken primarily for the benefit or interest of the Company.

Sincerely yours,



Steven Banks

cc: Eric Eichenholtz