



**NEW YORK CITY COUNCIL HEARING BY THE
COMMITTEE ON OVERSIGHT AND INVESTIGATIONS**

**TESTIMONY OF JOCELYN E. STRAUBER
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**CONCERNING HOW THE DEPARMTENT OF INVESTIGATION ENCOURAGES
CITY EMPLOYEES TO REPORT CORRUPTION**

**FRIDAY, JUNE 13, 2025
City Council Chambers, City Hall**

Good afternoon. My name is Jocelyn Strauber and I am the Commissioner of the Department of Investigation ("DOI"). Thank you, Chair Brewer and members of the Committee on Oversight and Investigations for the opportunity to speak about DOI's efforts to encourage City employees to report suspected corruption to DOI. As part of these efforts, DOI educates City employees about their legal obligation to report corruption, as well as the specific requirements of the Whistleblower Law that protects employees who experience retaliation as a result of such reporting.

New York City's "must report" obligation for City employees is part of the 1978 Mayoral Executive Order 16, issued in response to City corruption scandals, where City employees were aware of wrongdoing but failed to report it. The MEO rightly recognizes the critical role City employees play in combatting municipal corruption and protecting the integrity of City operations and services, as well as public dollars. The MEO directs every City employee to report, directly and without undue delay, to DOI, information concerning conduct they know or should reasonably know to involve corrupt or other criminal activity or conflict of interest involving the City, its employees, and those doing business with the City. Knowing failure to make such a report can result in penalties, up to termination.

New York City's Whistleblower Law provides protections to City employees who report corruption, consistent with their MEO 16 obligations, and who suffer retaliatory adverse employment action as a result. The protections are contingent upon following the Law's reporting requirements. Reports made to DOI, a member of the City Council, the Public Advocate, the City Comptroller, or the Special Commissioner of Investigation for the New York City School District ("SCI"), are protected under the Law. Individuals or offices that receive such reports have a duty to refer the information to DOI unless (1) the alleged conduct is within SCI's jurisdiction, in which case the complaint must be referred to SCI, or (2) the alleged conduct involved the SCI Commissioner, or the DOI Commissioner or a Deputy Commissioner, in which case the complaint must be referred to the City's Corporation Counsel.

The City Council has periodically expanded the Whistleblower Law's protections for those beyond City employees, to complainants alleging risk of harm to the health, safety or educational welfare of children and to officers and employees of vendors who have contracts with the City valued at \$100,000 or more.

Together, the "must report" MEO and the Whistleblower Law promote integrity in City government by both requiring proactive reporting of corruption, criminal conduct, and conflicts of interest and protecting from retaliation those City employees who comply with their obligations by making such a report. The laws are intended to encourage reporting to DOI, and they work. From Fiscal Years 2022 to 2024, between approximately 14% and 16% of the complaints DOI received were from people who self-identified as City employees alleging corruption, criminal activity, conflict of interest, gross mismanagement or abuse of authority. It is likely that additional complaints were made by City employees who did not self-identify as such, who wanted to remain anonymous, or who reported through their home agencies or other means. The majority of our complaints come from an array of sources including the public, referrals from other government agencies, such as law enforcement, and 311. DOI received more than 12,300 complaints in Fiscal Year 2022, more than 13,500 complaints in Fiscal Year 2023, and over 14,600 complaints in Fiscal 2024. It is important to note that many City employees provided valuable information in the course of DOI investigations, even if those investigations originated elsewhere.

These numbers are due in part to the outreach and training that DOI provides to City employees annually through both in-person and webinar corruption-prevention lectures. In these presentations City employees are educated on DOI's role in City government, best practices for combatting municipal corruption, the obligation to report corruption and fraud to DOI, how to do so, and the protections for doing so in the City's Whistleblower Law. The online training module is distributed through the Department of Citywide Administrative Services ("DCAS"). Since Fiscal Year 2022, DOI has trained more than 20,000 City employees annually through this model: 23,395 in FY 2022, 29,245 in FY 2023, and 27,351 in FY 2024. So far in FY 2025, through May, approximately 11,000 City employees have taken the module. In addition, DOI created a video presentation that is incorporated into DCAS's employee onboarding materials that they rolled out in 2024. Accordingly, now every new City employee who is onboarded at an agency that uses those materials receives DOI corruption-prevention training.

These online trainings are enhanced by in-person lectures that DOI staff, including investigators and Inspectors General and members of DOI's Training Unit, provide at the agencies. DOI seeks to meet each individual agency's unique needs, tailoring presentations to real scenarios agency employees have faced and providing training at the most convenient times and locations. For example, in FY 2023, DOI piloted corruption prevention lectures at Department of Sanitation garage locations throughout the City, to reach staff who reported to work in those locations. DOI staff trained DSNY supervisors to present DOI's corruption prevention lectures at these locations, enabling DOI's corruption-prevention message to be delivered to over 9,300 attendees during over 80 lectures. DOI hopes to find other similar opportunities in the future to expand our reach despite our limited staffing. From Fiscal Years 2022 through 2024, DOI has substantially increased its in person outreach, presenting 72 lectures in FY 2022, 240 in FY 2023, and 236 in FY 2024 to various City agencies. So far in FY 2025, DOI has presented approximately 190 of these lectures. These lectures are resource intensive, particularly given our small Training Division and the staffing challenges in our investigative squads. But we prioritize them because we believe they allow us to connect with City employees and facilitate reporting of corruption and other criminal conduct.

Not only do the lectures prompt complaints to DOI, they sometimes result in reporting to the DOI staff member who conducted the training, because putting a face and a name to DOI helps us gain the trust and confidence of City employees.

Complaints from City employees have led to successful DOI investigations.

For example, in July 2023, a pedicab driver was arrested after he attempted to bribe a City Department of Consumer and Worker Protection ("DCWP") employee in exchange for pedicab registration plates that are appropriately assigned via lottery. The conduct was thwarted by a DCWP employee who had attended a DOI corruption-prevention training and promptly reported the bribe offer to DOI. Ultimately, the pedicab driver pled guilty to Bribery in the Second Degree, a class C felony.

Separately, the sale of dozens of counterfeit safety and training certifications to New York City construction workers was investigated by DOI after a NYCHA employee's report to us. Our investigation led to the indictment of three Brooklyn residents, each of whom pled guilty.

Two separate investigations in 2024 were prompted by City Health employees reporting offers they received in the course of their jobs, with the apparent expectation that the employees would take action to benefit the bribe payor. In one, a Department of Health and Mental Hygiene ("DOHMH") Sanitarian reported to DOI that a test taker who had failed the agency's Food Protection Certificate exam and wanted a passing grade had offered cash to a DOHMH employee. DOI investigated and bribery charges were brought against the test taker who offered the bribe. In a second instance, a DOHMH inspector reported to DOI that she had found cash in her bag following an inspection of a deli, where the deli owner suggested that in exchange for the cash the inspector should fail to appear at a court appearance concerning the 67 violations identified at his restaurant. That report led to a DOI investigation and charges against the deli owner who ultimately pled guilty to Giving Unlawful Gratuities.

DOI's collaboration with the agencies that we oversee also promotes reporting of wrongdoing or suspected wrongdoing by these agencies and their employees. When we make recommendations for policy and procedural reforms, we further a dialogue with these agencies, which in turn encourages reporting to DOI. For instance, the City's Housing Development Corporation ("HDC") and the Department of Housing Preservation & Development ("HPD") regularly report to DOI income discrepancies identified in affordable housing applications, potential indicators of fraud. DOI has trained HPD to identify and to report to DOI forged Section 8 applications, based on DOI's experience with this type of fraud, allowing DOI to address corruption vulnerabilities and gaps in real time.

DOI also regularly communicates with the public about our investigations through press releases and statements, social media, and a robust public website that instructs City employees and members of

the public on how to report corruption, the Whistleblower Law, and even provides a quiz that City employees can take to test their knowledge about corruption and their ability to identify it.

DOI has worked to make reporting of corruption more accessible – through an easy-to-remember email address: corruption@doi.nyc.gov and through poster campaigns that visually promote our messaging at agencies. On our public website, we publicize the multitude of ways that complainants can reach us – through email, a hotline number, in-person, and through a comprehensive list of all Inspectors General, the agencies they oversee, and their specific contact information.

City employees are integral to DOI's anti-corruption mission and are fundamental to creating a culture of integrity in municipal government. DOI cannot accomplish its mission without them.

And while there is a "must report" mandate, DOI understands that it takes courage to step forward and report wrongdoing. To those many City employees who speak with us, and work with us, I commend and thank you for standing up for what is right, and for ensuring that government works for the people of New York City.

Thank you for your time and I am happy to take any questions you may have.