

The Inspector General 2025



By Roy Koshy

*[Ed. Note: While I was assembling this month's issue, an email mistakenly made its way to my email inbox. Normally I would hit "delete," but I couldn't help but be drawn into the story that unfolds in that message. Additionally, as I am on a deadline, I remembered the old saying, "there are no mistakes, only **gifts**"--which coincidentally was the intended subject of this month's issue. Enjoy!]*

My dear Kristokov,

As the holiday season descends, most "normies" obsess over the giving and receiving of items, goods, and services (or "gifts"). I do not. Rather, I give myself the gift of classic Russian literature. And Kristokov, I can hear you now, "Yes, again with the Russian Lit. And for the

last time my name is not Kristokov, it's Travis! Also, it's your turn to do the dishes!" But dear Kristokov, this is a tale that is truly stranger than fiction but is truer than truth!

Recently, I revisited one of my favorite Russian comedies, "The Inspector General" by Nikolai Gogol. In this much-celebrated play, Anton Antonovich, a venal small town mayor, and his corrupt inner circle are panicking about the appearance of an Inspector General sent to investigate them, so much so that they mistake Khlestakov, a dandy fop of a lowly civil servant, to be the actual Inspector General. The fraudulent Inspector Khlestakov proceeds to accept with relish all the gifts, loans, free housing, and access the corrupt officials and

townspeople offer him. Of course, after Khlestakov departs the town, the disreputable officials learn of their dire mistake when the real Inspector General arrives.

Well Kristokov, it seems that life has a way of imitating art, for I, Bradomovich Ivanov, have very recently become a public servant for the City of New York, specifically for the Department of Literary Leagues (DOLL), which oversees the safety of municipal book clubs throughout the five boroughs. In that capacity, I was invited to "Read the Room," a conference celebrating literature focused on interior design, with attendees from various vendors, non-profits, government agencies, and members of the public. One particular vendor approached me with an offer. His name was Tobe McIvey, owner of a high-end candy company. Tobe explained how he wanted to partner with DOLL to provide his fanciful sweets to our book clubs, explaining how the treats would elevate the discourse of our gatherings. He presented me an ornate box filled with the most elegant chocolates from across the globe, saying: "You look like a procurement manager with refined taste!" Even though I'm not a procurement manager, I was taken with his astute observation and was quite tempted by the delightful delectables. But alas Kristokov, I was accompanied at "Read the Room" by Grigory Petrov, General Counsel of DOLL (or "Greg Peters", as he insists on being called). Grigory alerted me to the Valuable Gifts Rule, which prohibits all public servants from accepting gifts worth \$50 or more from any person, firm, or not-for-profit doing business or seeking to do business with

any City agency.

Tobe humbly apologized but then opened the chocolate box and offered me just a few pricey delectables, valued at only \$49.00. I confess I found my hand drifting toward the box, but Grigory gently stopped me and said: "Remember Brad, the \$50.00 limit applies collectively over a 12-month period and to anything you receive from this company, not just from Mr. McIvey but anyone at the company. So even one more chocolate from this firm for the next year would put you in violation of the Valuable Gifts Rule." Well Kristokov, you know what mischief my sweet tooth can get up to, and I can hear you exclaiming: "You owe me for my brownies that you finished off as well as your share of December's rent!" With that in mind, Grigory and I decided that it would be best not to accept anything from Tobe and his company, as it was being offered to me in connection with my City employment.



As we traversed this vibrant conference, I encountered Sylvia, a delightful New Yorker who participates in one of DOLL's Young Adult book clubs in Queens. Syl-

via remembered me from one of my site visits, and she told me how grateful she was for our work in encouraging reading at all ages. She presented me a gift card of \$5 for “Dunkin”, a company specializing in Boston coffee. As I was about to accept the gift card, I remarked to Grigory, “Well this is definitely under \$50” To which Grigory sighed, “Again, it’s Greg, and no you cannot accept this gift card, for it constitutes a gratuity in connection with the service you provide in your City job. Public servants are prohibited from accepting compensation other than our salaries, so a tip of any value is not allowed.” Both Sylvia and I were quite grateful to learn of this legal prohibition, and in a further show of appreciation Sylvia offered the gift card to Grigory for keeping our Agency so ethical, which he of course had to again refuse.

Grigory and I walked along the periphery of the event and found ourselves facing a spread of pastries, sandwiches, and a variety of coffees and teas. I said to Grigory, “Ah, the cruelty! To look out over this sea of sweet and savory vittles yet not ever experience a taste!” Grigory responded: “Oh, we can have these offerings. You see, our Commissioner deemed it worthy for us to attend this event, and when food and beverages are offered part of the event and to everyone, not just us, then we are allowed to partake.” Upon Grigory uttering his final syllable, I found myself devouring a substantial portion of pastries and sandwiches. Grigory commented with a hearty chuckle: “But Brad, that doesn’t mean you gotta eat all of it,” to which I rejoined, “Quiet, ‘Greg!’”



We returned to the DOLL offices, and, much to my surprise, there was a box of artisanal empanadas on my desk. A note in elegant cursive was taped to the top, which read, “Thank you and Happy Holidays!” I called out to Grigory, “Grigory! Come quick!” Grigory rushed in, “Again it’s Greg! And what is it now?” I showed Grigory the empanadas and the note. We could not surmise whether this was intended as a gift or a tip, so Grigory suggested we contact DOLL’s Inspector General. I excitedly exclaimed, “Hey that’s my favorite play!” With a look of confusion and annoyance, Grigory went to call the IG.

The empanadas, being of the artisanal variety, were too fragile to return, so it was decided that the empanadas would be placed in a common area for the entire Agency to enjoy. Grigory and I decided to call it a day. We exited our office building, and Grigory turned to me and said, “Hey, what a long and fruitful day we had, how about I treat you to a jazz concert and drinks on me.” I defensively replied, “Oh no, Grigory! I know NOT to accept gifts or anything of value in connection with my City employment!”

Grigory exclaimed: "Again it's Gr--! Never mind. You can accept this offer from me because I am the General Counsel. I am able to give concert tickets and free drinks to almost anyone in the agency over whom I have authority, but I could not accept the same from you or anything of value from you beyond a token value offering." I understood what Grigory was saying about gift-giving and power dynamics between City employees, and I just had to ask him, "Grigory, how do you keep so ethical in your public service?" Grigory wryly smiled, reached in his pocket, and handed me a piece of literature, a simple document with the riveting title "Conflicts of Interest Law – Plain Language Guide." Grigory leaned in and revealed, "I keep a copy on me at all times." As I perused this mini-masterwork, I learned that those of us fortunate enough to be in the employ of our great municipality can always receive top-notch advice from the Conflicts of Interest Board regarding gifts or any outside private interests by calling the Attorney of the Day Hotline at 212-437-0707 during business hours or emailing anytime at aod@coib.nyc.gov.



Well Kristokov, as I journey back home through the metal tubular train that runs under our fair city, I'm sure you'll be thrilled to know that I've decided to broaden my literary horizons and have settled in to reading: "Chapter 68 of the City Charter."

Roy Koshy is an Education & Engagement Specialist at the New York City Conflicts of Interest Board.



nyc.gov/ethics

Phone: (212) 442-1400

Fax: (212) 437-0705



Recent Enforcement Cases

Misuse of City Time. A Marine Engineer for the New York City Department of Correction ("DOC") had a second job as a General Mechanic at the Pratt Institute, a firm that does business with the City. The Marine Engineer worked more than 125 hours for Pratt at times when he was required to be working for DOC. The Marine Engineer agreed to pay a \$9,000 fine.

Misuse of City Time. A Special Education Teacher for the New York City Department of Education ("DOE") also worked as a Data Manager for the United States General Services Administration ("GSA"). On 212 days, the Special Education Teacher worked for GSA at times she was required to be working for DOE. As a result of this conduct, DOE discontinued the Special Education Teacher's employment and deducted more than \$8,000 from her paychecks in restitution for her overpayment. In a separate settlement with the Board, the now-former Special Education Teacher agreed to pay a \$1,500 fine.

Misuse of City Resources. Vice President of the Elevator Services Repair Department at the New York City Housing Authority ("NYCHA") used his assigned NYCHA vehicle after work hours to drive to personal destinations, including to the barber shop and to visit friends and family. In a joint settlement with the Board and NYCHA, the Vice President agreed to serve a five-day suspension and forfeit five

days of annual leave, collectively valued at approximately \$8,520.

Confidential Information. A Child and Family Specialist at the New York City Administration for Children's Services ("ACS") used her ACS credentials to access the New York City Department of Education ("DOE") ILOG system to view confidential information concerning her son, who is a DOE student. She then emailed her son's principal, teacher, and counselor to express her dissatisfaction with their notes in ILOG and to request that they change their notes. In a joint settlement with the Board and ACS, the Child and Family Specialist agreed to serve a four-day suspension, valued at approximately \$1,500.

Job-Seeking Violation. A Senior Director at the New York City Department of Citywide Administrative Services ("DCAS") was overseeing a contract with National Renewable Energy Laboratory ("NREL") while she applied for, interviewed for, negotiated, and accepted employment with NREL. The Senior Director also: continued to oversee NREL's contract during the period between when she accepted employment with NREL and when she left DCAS; participated in a phone call with NREL about relocation benefits while she was required to be performing work for DCAS; and used her City email account to send herself an email summarizing those relocation benefits. The now-former Senior Director agreed to pay a \$6,500 fine.

Recent Enforcement Cases

Job-Seeking Violation. The Executive Director of Housing Initiatives at the Mayor's Office of Criminal Justice ("MOCJ") was overseeing a contract with a MOCJ vendor while she applied for and interviewed for the position of CEO at the vendor, which position she was not offered. In a three-way settlement with the Board and MOCJ, the Executive Director agreed to pay a \$2,500 fine to the Board.

Prohibited Appearances; Prohibited Chairing of a Community Board Committee Meeting. Manhattan Community Board 6 ("CB 6") paid the architecture and design firm of a CB 6 Member to render a study of a redesigned corridor of FDR Drive, which runs through CB 6. The Member worked on the study for his firm and presented the study to CB 6. He later chaired a meeting of the CB 6 Land Use and Waterfront Committee at which the Committee considered whether to recommend the study's findings, and the Member answered questions posed by the Committee. The Member agreed to pay a \$3,500 fine.

Confidential Information; Misuse of City Resources; Misuse of City Position. An ACS Child Protective Specialist had a son whose girlfriend had a child who was the subject of ACS intervention. For a personal, non-City purpose, the Child Protective Specialist accessed a confidential database to

view information concerning the investigation. Additionally, the Child Protective Specialist went with his son's girlfriend to help her regain physical custody of her child; while at the home where the child was staying, he displayed his ACS identification and identified himself by his ACS title. The now-former Child Protective Specialist agreed to pay a \$3,000 fine.

Conduct Conflicting with Official Duties. The Assistant Chief for Enforcement at the New York City Department of Sanitation ("DSNY") was contacted by another DSNY Assistant Chief ("AC 2"), who complained about a summons he received for violating DSNY Recycling Rules. Instead of directing AC 2 to follow the standard process for challenging this summons, the Assistant Chief contacted a DSNY Enforcement Unit Superintendent, who was his subordinate, informed him that AC 2 had called to report that he had received a summons he believed was invalid, and instructed the Superintendent to "investigate" the summons. After speaking only with AC 2 (and not the Enforcement Agent who issued the summons), the Superintendent voided the summons. The Assistant Chief agreed to a public warning letter.

Visit our [search engine](#) for all COIB Enforcement Dispositions.