

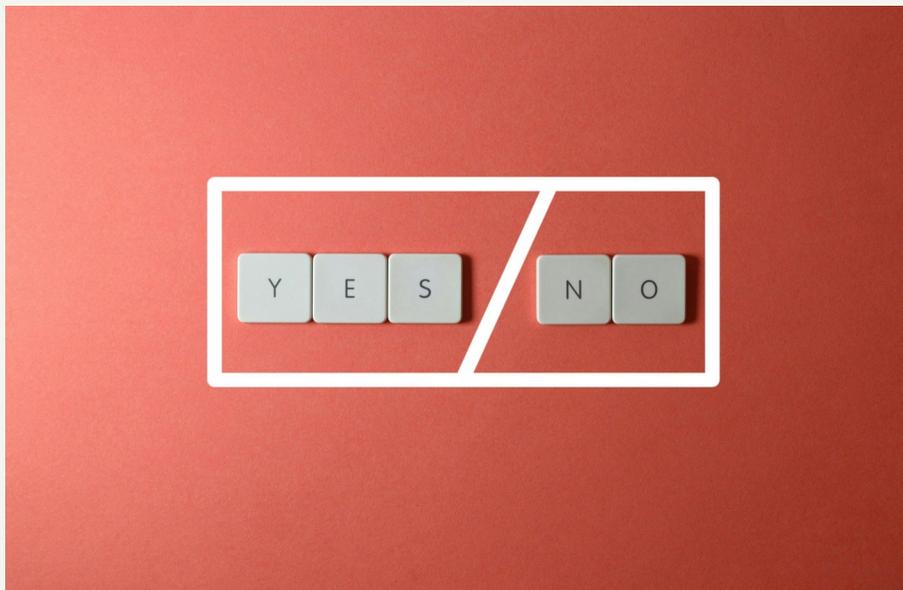


# The Ethical Times

Roy Koshy, Editor

Volume 28, Issue 1 — January 2026

## It's Okay!



**By Rob Casimir**

Conflicts of Interest training is a lot of what not to do: don't misuse City time or resources, don't take prohibited gifts or tips, avoid financial entanglements with your boss – by now, you're familiar with the list. Most people are! And that's good news. It means that, in the average COIB training session, you're going to hear a lot of correct answers:

Ask how the Board has defined a "valuable gift" – you'll hear "\$50!"

Ask if a subordinate can move in with

their supervisor, and you'll get a resounding "no!" followed by "also, a terrible idea."

This is all great! City employees have a whole host of official responsibilities on top of their obligations under the ethics law, and being able to quickly identify and address ethics issues as they arise is absolutely essential to a healthy, functioning City government.

But there's issue-spotting, and then there's seeing issues *everywhere*.

In fairness, this isn't the worst thing in the world: no one ever received an ethics fine for being too cautious. So the incentives are definitely in place for your intrepid ethics trainer to ask questions of a class and receive back – let's say – "overcorrections."

Are you allowed to exchange holiday gifts with a coworker at your office? "*Oh man, I wouldn't do it!*"

Can you attend your supervisor's wedding? "*Not if you want to keep your job!*"

What about owning a business on the side? "*Sent to a Siberian labor camp!*" (More or less.)

None of these three situations presents a conflict of interest violation, by the way. And the overcorrections can be fine, too! If you want to guarantee that you'll never have an outside business that violates Chapter 68, just never start that business. And while you're at it, cancel your social calendar, and never give or receive a gift from anyone. But this is the part of COIB's mission that is most frequently misunderstood: the law doesn't exist to ensnare public servants who are not sufficiently careful, but to provide guidance on how to balance your public and private interests in a way which is ethical, consistent, and fair. COIB is a service agency, and we're here to serve *you* as well as the public.

We want you to call for advice because we don't want you to wing it and end up with an ethics violation, sure. But just as important: we want you to *know what's possible*. Missing out on a great opportunity because you thought it wasn't al-

lowed is its own particular brand of tragedy.

So, in that spirit, here's a Brief and Extremely Non-Exhaustive List of Things That Are Mostly Okay:

**Having all sorts of second jobs, even ones at firms that do business with the City.** If the firm where you're working doesn't do business with the City, you're fine; if it does, you're almost certainly still fine, you just need to [apply for and receive a Moonlighting Waiver](#) to demonstrate that the outside position causes no real conflict with your City job.

**Giving gifts to your coworkers.** The Valuable Gifts Rule says City employees cannot accept a gift worth \$50 or more from any person or firm that does, or intends to do, business with the City. That doesn't describe your peers at work. So exchange gifts freely! Just don't give to your supervisors – there's a different rule about taking things of value from those over whom you have official power.

**Some "Minimal, Personal, Incidental" use of certain City resources.** Surprising, right? While the law states that public servants may not – with *zero tolerance* – use City supplies, letterhead, telephone, e-mail, computers, equipment, resources, or personnel for any business or political purpose, for *personal* purposes, the Board has developed an "Acceptable Use Policy" ("AUP"). This policy explains where and when use of a City resource (not including email, letterhead, or personnel) is "minimal, personal, and incidental" and thus would not present a conflict of interest problem.

Check with your [agency ethics liaison](#) to find out if your agency has adopted the AUP or has any other policies regarding personal use of City resources.

**Using your City ID to obtain a discount, as long as that discount is available for the benefit of all City employees.** City workers can find a number of special deals on our employee portal: discounts on laptops, phone bills, theater tickets, hotel stays – all sorts of things. Unlike using one’s City position to solicit a personal or financial gain, these are acceptable because they are open to all government workers.

**Working for a company you previously worked with in your City capacity.** You can’t talk future employment with those people and firms you are currently dealing with in your official capacity. But let’s say you finish some City matter with a firm and, after the project is completely over, the firm tells you about a job opening they have. You may apply for that job. You may accept that job. You may start at that job tomorrow, even if that firm has frequent business with your former agency. You just can’t make any *compensated appearances* at your former agency on behalf of your new employer for *one full year*. Working at the firm is fine. Visiting your former coworkers socially – say, for a retirement party – also fine!

**Reading this newsletter while on the clock.** *Whew!*

There’s more – much more than we could possibly cover here - but by now you get the point. The conflicts of interest law

limits what we can do in some very important ways, but not in *every possible way*.

And even in those cases where you are presented with a true conflict of interest, it’s not the end of the world, but the start to a conversation on how to best resolve that conflict in a way that is ethical and fair. We hope that the next time you spot a potential issue, you’ll reach out to us – (212) 437-0707 or



[AOD@coib.nyc.gov](mailto:AOD@coib.nyc.gov) – so we can make sure you don’t miss either a looming ethics violation or a great opportunity.

Rob Casimir is the Senior Education & Engagement Specialist at the New York City Conflicts of Interest Board.



[nyc.gov/ethics](http://nyc.gov/ethics)  
**Phone: (212) 442-1400**  
**Fax: (212) 437-0705**

## Recent Enforcement Cases

### **Misuse of City Position; Superior-Subordinate Financial Relationship.**

The Director of Nursing for Cardiac Telemetry at New York City Health + Hospitals/Bellevue subleased an apartment to her subordinate from 2010 to 2015. When her subordinate died of COVID-19 in 2020, the Director of Nursing set up a GoFundMe in the subordinate's name, highlighting the subordinate's work for Bellevue and stating that donations would assist the subordinate's immediate family. The GoFundMe raised more than \$27,000. The Director kept more than \$22,000 for three years, turning over the money to the subordinate's family only after an investigation had been launched by the New York City Department of Investigation. The Director of Nursing agreed to pay a \$7,000 fine.

**Misuse of City Resources.** The New York City Administration for Children's Services ("ACS") contracted with a car service to provide transportation for ACS employees pursuant to specific guidelines. Contrary to those guidelines and without written approval, an ACS Child Welfare Specialist Supervisor used the car service to commute between his assigned work location and his home. ACS paid \$5,080 in total for 120 trips taken by the Supervisor. The now-former Supervisor agreed to pay a \$6,000 fine.

**Prohibited Post-Employment Communications.** The Director of the Mayor's Office of Contract Services ("MOCS") and her Executive Assistant left City service to become CEO and Ad-

ministrative Coordinator, respectively, at Catholic Charities Community Services ("CCCS"). Shortly after departing City service, the former Executive Assistant sent emails to her former MOCS colleagues seeking their guidance on behalf of CCCS partners. In her emails, the former Executive Assistant wrote that she was reaching out on behalf of the former Director. The former Director agreed to pay a \$2,500 fine, and the former Executive Assistant agreed to pay a \$1,000 fine. These fines took into account that the former Director had been advised by Board Staff that she was prohibited from communicating with MOCS for one year after her departure from City service. The Board also considered that the former Executive Assistant was acting at the direction of her supervisor.

### **Moonlighting; Misuse of City Time.**

An Assistant Dean at the New York City Department of Education ("DOE") had a second job at New York Junior Tennis and Learning ("NYJTL"), a firm with business dealings with DOE, including running an afterschool program at the Assistant Dean's school. He performed 26½ hours of work for NYJTL at times he reported that he was working for DOE. The Assistant Dean agreed to pay a \$2,000 fine.

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