



**Testimony to the New York City Conflicts of Interest Board (COIB)
on Proposed Rules Regarding Gifts**

April 1, 2021

Thank you for the opportunity to submit written testimony for this hearing. Reinvent Albany advocates for open and accountable New York government.

Reinvent Albany believes most of COIB’s proposed rules regarding public servants’ acceptance of gifts are reasonable and will help city employees determine whether or not gifts are in violation of the rules.

We urge COIB to add a dollar limit under proposed rule §1-01(k)(2)(i), which permits subordinates to give gifts for major life events (wedding, retirements, etc.) so long as “the gift is of the type and value customary to the occasion in question.”

The proposed rules do include a value limit of ten dollars when the gift is for birthdays or holidays (§1-01(k)(2)(ii)). COIB’s statement of basis and purpose declares that this limit “would offer a safeguard against a superior -- particularly in a large City agency or office -- receiving hundreds of dollars in cash or cash equivalents, such as gift cards, from their subordinates.”

Reinvent Albany believes that this same safeguard is needed for gifts for major life events. It is conceivable that a wedding or retirement gift, such as a gift card with a high dollar value, could be considered “customary to the occasion in question” but also be used to influence a superior. For this reason, we believe COIB should apply a value limit to gifts for major life events as well.

Many states and localities [provide an exception](#) for gifts for major life events, so a value limit rule may be unprecedented, but it is also not unprecedented for wedding gifts to be used for personal gain. Former Virginia Governor Bob McDonnell was [convicted on](#)

[federal charges](#) after allegedly promoting the business of a caterer who had provided gifts at his daughter's wedding (the charges were [eventually vacated](#)). Reinvent Albany believes that NYC can be a national leader on this issue by placing a dollar limit of \$50 on gifts for major life events. This would make the limit consistent with the City's [\\$50 valuable gifts rule](#).

Thank you again for the opportunity to submit testimony. Please send any follow-up questions to Tom Speaker at tom [at] reinventalbany.org.