



CITY OF NEW YORK  
CONFLICTS OF INTEREST BOARD

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August 7, 2015

Ama Dwimoh, Esq.  
Office of the Brooklyn Borough President  
Brooklyn Borough Hall  
209 Joralemon Street  
Brooklyn, NY 11201

Re: Conflicts of Interest Board Case No. 2015-436/a (Eric Adams and Ama Dwimoh)

Dear Ms. Dwimoh:

This is in response to your e-mail dated July 13, 2015, to the Conflicts of Interest Board (the "Board"), and subsequent communications with Board staff, requesting an opinion as to whether, consistent with the conflicts of interest provisions of Chapter 68 of the New York City Charter, you and Brooklyn Borough President Eric Adams may accept a trip (the "Trip") to Turkey from several Turkish sources.

You advise the Board that the Borough President was invited by the Republic of Turkey, Üsküdar Municipality (the "Municipality"), and the Turkish Consulate General in New York (the "Consulate") to visit Turkey; that the purpose of the Trip will be to enter into a Sister City Agreement with the Municipality and to discuss cultural, educational, tourism, and economic matters impacting and benefitting Brooklyn and Brooklyn's growing Turkish-American community with Turkish government officials and faculty members from local universities; that you will accompany the Borough President on the Trip; and that you are Special Counsel to the Borough President and you monitor and review all of the Borough President's Sister City Agreements and international relationships as well as focus on youth, safety, and education issues. You have provided an itinerary for this Trip.

*Visit our home page at <http://nyc.gov/ethics>*

You additionally advise the Board that you and the Borough President will be accompanied on the Trip by two people chosen by the Borough President, Rana Abbasova and Timothy Pearson; that neither is an employee of the Borough President's Office or a City employee; that Ms. Abbasova is the Borough President's Advisor for Community Affairs and Liaison to Eastern European Muslim Countries, that she is a volunteer at Borough Hall, that she works closely with the Turkish-American community in Brooklyn, and that she will serve as a translator and cultural advisor on the Trip; that Mr. Pearson is the Director of Security at Resort World Casino in Queens, President of the National Organization of Black Law Enforcement Executives, and is on the Borough President's Public Safety Transition Committee; and that Mr. Pearson's role on the Trip will be to assist in identifying and addressing security matters regarding tourism and ways to promote and maintain safety in Brooklyn. You further advise that neither Ms. Abbasova nor Mr. Pearson are the relatives or personal guests of you or the Borough President.

You advise the Board that the costs associated with the Trip will be paid for by the following entities: the Municipality, Bahçeşehir University, Turkish Airlines, Istanbul Metropolitan Municipality, Kayseri Metropolitan Municipality, and the Consulate's Office of the Attaché for Cultural Affairs and Promotion (collectively, the "Sponsors").

You further advise the Board that you and the Borough President will leave the City for Turkey on August 10, 2015, and return to the City on August 15, 2015; that the Sponsors have offered to pay for the costs of airfare, travel within Turkey, accommodations, and meals for a total cost of \$15,000 for you, the Borough President, Ms. Abbasova, and Mr. Pearson; that the Borough President is the only member of the group that will fly business class to Turkey; and that neither you nor the Borough President will be accompanied by any personal guests on the Trip.

You now seek the Board's advice as to whether the Sponsors may pay for the costs associated with the Trip.

Charter Section 2604(b)(3) prohibits a public servant from using his or her City position for his or her private advantage, or the private advantage of any person or firm with which he or she is associated.

Charter Section 2604(b)(5) prohibits a public servant from accepting a valuable gift from any person or firm that such public servant knows is or intends to become engaged in business dealings with the City.

Board Rules Section 1-01(h) provides, however, that a public servant may accept payment of travel related expenses, even from persons or entities doing or interested in doing business with the City, when (1) the trip is for a City purpose, and therefore could properly be paid for with City funds, (2) the travel arrangements are appropriate to that

purpose, and (3) the trip is no longer than reasonably necessary to accomplish the business that is its purpose.

You are advised that, based on your representations, since it appears that the above-described Trip will serve a City purpose, that the travel arrangements are appropriate to this City purpose, and that the Trip will be no longer than reasonably necessary to accomplish that purpose, it would not violate Chapter 68 for you and the Borough President to accept this Trip as a gift to the City. See Board Rules Section 1-01(h).<sup>1</sup> You are advised, however, that the Sponsors may not pay for the travel or any expenses of any relatives or guests who might accompany you or the Borough President on the Trip.

While not a formal opinion of the Board, this letter expresses the views of counsel to the Board and is intended to provide information and guidance to you. These views are conditioned on the correctness and completeness of the facts supplied to us. If such facts are in any way incorrect or incomplete, the advice we have given to you may not apply. If at any time you would like further advice based on a change of circumstances or additional information, or if you would like a formal opinion of the Board, please contact us. The Board meets regularly each month.

Very truly yours,



Amber Marie Gonzalez  
Assistant Counsel

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Enclosure

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<sup>1</sup> Additionally, since you or the Borough President may be required to file an Annual Disclosure Report with the Board, you should bookmark this travel for possible inclusion in the Report you or the Borough President will file in 2016.