

**THE CITY OF NEW YORK
CONFLICTS OF INTEREST BOARD**

x

In the Matter of

The Financial Disclosure Appeals of:

John Acito
Lisa Bernard
Retha Boston
Pamela Clipper
William Flores
John Gonzalez
Elliot Greene
Beth Hoffman
Terry Jacobson
Joanne L. Morey
Pilar Pardon
Sandra Piggee
Jeffrey Rosen
Lydia Schwartz
Elaine Wilson

FD No. 2013-03

x

**FINAL FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND ORDER**

Upon consideration of all the evidence presented in this matter, and upon the full record herein, including all papers submitted to, and the recommended findings of, neutral arbitrators of the Office of Collective Bargaining (“OCB”), the Conflicts of Interest Board (“COIB” or “the Board”) adopts the recommendations of OCB neutral arbitrators Patricia McM. Bartels and Earl R. Pfeffer that John Acito, Lisa Bernard, Pamela Clipper, William Flores, John Gonzalez, Pilar Pardon, Jeffrey Rosen, Lydia Schwartz, and Elaine Wilson are required to file an annual disclosure report for calendar year 2011 and that Retha Boston, Elliot Greene, Beth Hoffman, Terry Jacobson, and Joanne L. Morey are not required to file an annual disclosure report for calendar year 2011 pursuant to section 12-110(b)(3)(a)(4) of the New York City Administrative Code and 53 RCNY § 1-15. The Board rejects the recommendation of OCB neutral arbitrator Earl Pfeffer that Sandra Piggee is required to file an annual disclosure report for 2011 and finds that she is not required to file.

These annual disclosure appeals involve Special Consultants John Acito, Lisa Bernard, Retha Boston, Pamela Clipper, William Flores, John Gonzalez, Elliot Greene, Beth Hoffman, Terry Jacobson, Joanne L. Morey, Pilar Pardon, Sandra Piggee, Jeffrey Rosen, Lydia Schwartz,

Elaine Wilson, all of who are employees of the Department of Health and Mental Hygiene (“DOHMH”). Each employee was notified by DOHMH of the requirement, pursuant to Section 12-110(b)(3)(a)(4) of the Administrative Code of the City of New York, to file an annual disclosure report for calendar year 2011.¹ Each employee fully and timely appealed that designation, first to the agency head² and then to the Board, and the matters were heard in three separate hearings before two OCB neutral arbitrators.³

During the reporting period (calendar year 2011), the aforementioned DOHMH employees worked in various bureaus of the agency’s Division of Mental Hygiene. DOHMH contracts with non-profit agencies (“providers”) to provide various services to DOHMH clients of these bureaus. As explained herein, the appealing employees have various duties and responsibilities with respect to DOHMH’s relationship with those providers.

Section 12-110(b)(3)(a)(4) of the Administrative Code of the City of New York requires the filing of an annual disclosure report by:

Each employee whose duties **at any time** during the preceding calendar year involved the negotiation, authorization or approval of contracts, leases, franchises, revocable consents, concessions, and applications for zoning changes, variances and special permits, as defined by rule of the conflicts of interest board and as annually determined by his or her agency head or employer, subject to review by the conflicts of interest board. (Emphasis added.)

The rules of the Board clarify which tasks will be held to cause an employee to have the responsibilities set forth in that Section and thus require the employee to file annual disclosure reports if they performed any of the tasks during the reporting year (“contract filers”). Any employee who is involved in the substantive determination of any aspect of the contracting process, whether in the drafting of a contract, the evaluation of a bid, the approval of documents

¹ Annual disclosure reports pertaining to a particular calendar year are filed in the next calendar year. For example, reports relating to 2011 were filed in 2012.

² The Board notes that it initially remanded the appeals of these employees to DOHMH for the agency to provide the employees with the full 14-day period to submit documents in support of the appeal pursuant to the Financial Disclosure Appeals Process. *See Matter of Acito, et. al.*, FD Order 2012-2 (August 28, 2012). DOHMH subsequently provided the employees with the full 14-day time period and denied the appeals; the employees thereafter again appealed the denials to the Board.

³ The appeals were heard pursuant to the Financial Disclosure Appeals Process, the procedure for hearing appeals that was previously agreed to among COIB, the City’s Office of Labor Relations, and DC 37. The matter of John Acito, Lisa Bernard, Sandra Piggee, John Gonzalez, and Retha Boston was heard before Earl R. Pfeffer on April 25, and 29, 2013. The matter of Pamela Clipper, William Flores, Pilar Pardon, Jeffrey Rosen, Lydia Schwartz, and Elaine Wilson was heard before Patricia McM. Bartels on April 10, and 15, 2013. The matter of Elliot Greene, Beth Hoffman, Terry Jacobson, and Joanne L. Morey was heard before Earl R. Pfeffer on April 5, 2013.

relating to a contract, or the determination of contract policies, rules, or regulations, is required to file.⁴ Included in the category of contract filers is any employee who “[n]egotiates or determines the substantive content of a contract, lease, franchise, revocable consent, concession, or application for a zoning change, variance, or special permit or change order,”⁵ “[r]ecommends or determines whether or to whom a contract, lease, franchise, revocable consent, concession, or application for a zoning change, variance, or special permit or change order should be awarded or granted,”⁶ or “[a]pproves a contract, lease, franchise, revocable consent, or concession or change order on behalf of the City or any agency subject to Administrative Code §12-110.”⁷

Exempted from this particular category of employees required to file annual disclosure reports are clerical personnel and other public servants who perform only ministerial tasks.⁸ For purposes of the Conflicts of Interest Law, Charter §2601(15) defines “ministerial matter” as “an administrative act . . . which does not involve substantial personal discretion.”⁹

John Acito, Lisa Bernard, Sandra Piggee, and John Gonzalez

During the reporting period, John Acito, Lisa Bernard, John Gonzalez, and Sandra Piggee worked in the Bureau of Developmental Disabilities, which oversees services for adults and children with developmental disabilities.¹⁰ Their office title and civil service title are Special Consultant II. They conduct site visits to insure that the providers with which DOHMH contracts are providing the level of service required under the applicable contract, and they prepare written reports of these visits. There are no set requirements as to how to conduct site visits, and Special Consultants discuss issues that arise during a site visit first with a DOHMH supervisor and then with the provider.¹¹

⁴ Board Rules §1-15.

⁵ Board Rules § 1-15(a)(4).

⁶ Board Rules § 1-15(a)(5).

⁷ Board Rules § 1-15(a)(6).

⁸ Board Rules § 1-15(b). For example, “public servants who are under the supervision of others **and** are without substantial personal discretion, **and** who perform only clerical tasks . . . shall not, on the basis of such tasks alone, be required to file an annual disclosure report.” *Id.* (emphasis added). Examples of ministerial tasks include “typing, filing, or distributing contracts, leases, franchises, revocable consents, concessions, or zoning changes, variances, or special permits or calendaring meetings or who identify potential bidders or vendors.” *Id.*

⁹ The Board concludes that the Charter definition of “ministerial matter” shall apply to the interpretation of “ministerial tasks” referenced in Board Rules § 1-15(b).

¹⁰ During the reporting year, this unit was known as the Bureau of Mental Retardation and Developmental Disabilities.

¹¹ Testimony claimed that the site visit reports “play a central role in contract renewal” whenever disagreements arise as to the provider’s levels of service or other contract issues or whenever the Bureau of Developmental Disabilities and provider negotiate such points as days and hours of operation. However, no evidence was adduced at the hearing that there were any such

When providers request budget modifications, paperwork is submitted to the Special Consultants. In the budget modification documents introduced into evidence as exhibits in the hearing, Acito, Bernard, and Gonzalez affixed their signatures on DOHMH's Budget Modification Request page for their respective programs,¹² although DOHMH and the appellants disagreed whether the signatures indicated approval/review of the request or verification of the underlying facts.¹³ In addition, Special Consultants Acito, Bernard, Gonzalez, and Piggee were also specifically asked for recommendations whether DOHMH should increase or reallocate funds for certain providers; that request came via an August 10, 2011, email from their supervisor asking for feedback or thoughts on whether and why certain providers should be re-allocated additional funds from the City.¹⁴ While Bernard and Gonzalez responded to their supervisor's request, and specifically recommended that particular programs receive additional funds, there is no evidence in the record that Acito and Piggee did so.¹⁵

The Board first concludes that the Special Consultants' work signing off on budget modification requests, indicating their approval or review of the documents supplied by the providers they monitor, involves them in negotiating or determining the substantive content of a contract or change order, or recommending or determining whether or to whom a change order or contract should be awarded or granted, or approving a contract or change order.¹⁶ Therefore, their role falls squarely within Administrative Code § 12-110(b)(3)(a)(4) and Board Rules §§ 1-15(a)(4), (5) and (6), and they perform the duties outlined in those provisions.

To be exempted from the filing requirement, a public servant involved in contracting responsibilities must perform only ministerial tasks.¹⁷ Although the Special Consultants are supervised, their work is not solely ministerial. They sign off on budget modification requests, indicating their approval or review of the documents supplied by the providers they monitor. Their work determines the approval of a budget modification, and they clearly do not perform merely ministerial duties.

The Board concludes that Acito, Bernard, and Gonzalez are required to file an annual disclosure report for calendar year 2011 based on their signing off on budget modification requests. However, it does not find that they are required to file based on one email to them

negotiations in calendar year 2011. Report and Recommendation of Earl Pfeffer In the Matter of Acito, et. al., May 20, 2013 at 8 ("Pfeffer Acito Report").

¹² See Acito Hearing Exhibits 4a, 4b, and 4c. The Board finds that a budget modification request is akin to a change order. See Board Rules § 1-15.

¹³ Compare Pfeffer Acito Report at 9-10 with Pfeffer Acito Report at 12-13.

¹⁴ Pfeffer Acito Report at 11.

¹⁵ *Id* at 20.

¹⁶ The Board finds that disclosure is required even if the Special Consultant's signature on the budget modification request indicates review, and not approval, of the request. See *Matter of Acevedo et. al.*, FD Order No. 2013-1 (April 10, 2013) at 6 (certification of measurements that affect the price of a lease that is not checked by a supervisor requires the filing of an annual disclosure report).

¹⁷ Board Rules § 1-15(b).

requesting a recommendation as to funding for a provider, whether they replied to the email or not, particularly where it appears to be an informal request for input and not a requisite part of the contracting or budget process.¹⁸

The Board further finds that Piggee did not have contracting duties in 2011. There is no evidence in the record that she signed off on any providers' budget modification requests in 2011, and she did not even reply to her supervisor's email requesting a recommendation as to funding for the named providers. The Board declines to adopt the impartial arbitrator's finding that Piggee's lack of response to that email "constituted a decision against recommending any of the listed programs."¹⁹ In any event, as noted above, a response to that email would not have triggered a requirement to disclose. Accordingly, she is not required to file an annual disclosure report for calendar year 2011.

Retha Boston

Retha Boston worked in the Bureau of Alcohol and Drug Use during 2011 as a Special Consultant.²⁰ She conducts site visits and prepares reports containing her observations. However, there was no evidence adduced at the hearing that her work during calendar year 2011 involved contracting. No 2011 site visit resulted in any issues requiring negotiation: only one site visit report was identified, and it did not have any effect on contracts or funding.²¹ In addition, there was no evidence she weighed in on either a budget request or on whether a contract should be renewed.²² Accordingly, the Board concludes that Boston is not required to file an annual disclosure report for 2011.²³

¹⁸ The Board notes that since Admin. Code § 12-110(b)(3)(a)(4) requires the filing by City employees "whose duties **at any time** during the preceding calendar year" involved contracting duties, a single act can justify the filing of an annual disclosure report. (Emphasis added.) However, in this instance, the Board concludes that the response, or lack thereof, to a single email seemingly outside the formal budget or contracting process does not require the filing of an annual disclosure report.

¹⁹ Pfeffer Acito Report at 21.

²⁰ This was both her office and civil service titles. The Board notes that she was the only appellant whose civil service title was not Special Consultant Level II.

²¹ *Id.* at 12.

²² *Id.* at 12, 14. Although Boston testified that she verified staffing figures for contract renewals or budget modification requests, there is no evidence as to the role that such verification played in those processes or as to whether her verifications were checked or whether she signed off on budget modification requests. *See* footnote 16, *supra*.

²³ The Board notes that "the burden rests upon the agency to come forward with specific evidence showing that the employee performed duties falling within one of the required filing categories." Financial Disclosure Appeals Process at B(7)(citations omitted). The Board has found that an agency's failure to set forth reasons for its denial requires the appeal to be granted on default. *Matter of DeLisi*, FD Order 2013-2; *Matter of Acevedo, et al.*, FD Order 2012-1 (April 19, 2012).

Pamela Clipper, William Flores, Pilar Pardon, Jeffrey Rosen, Lydia Schwartz, and Elaine Wilson

Pamela Clipper and William Flores work in the Office of Rehabilitation; Pilar Pardon and Lydia Schwartz work in the Office of Treatment Services; Jeffrey Rosen works in the Bureau of Contracts; and Elaine Wilson works in the Bureau of Children, Youth and Families (these three units are part of the Bureau of Mental Health). Their civil service title is Special Consultant II, and their office title is Program Specialist.

There is a Scope of Services (“SOS”)²⁴ for each program a provider overseen by the Bureau of Mental Health supplies, and the programs report monthly on their levels of services (“LOS”).²⁵ Program Specialists’ program management responsibilities²⁶ include monitoring programs on a regular basis by frequently speaking with the provider and conducting site visits once or twice yearly “to evaluate whether the program is managed according to its SOS, and whether it is achieving the stated outcome measures.”²⁷ Program Specialists may be asked to recommend changes in the LOS and “may recommend – and negotiate with the provider – a revised scope of service. The Program Specialist can agree to minor changes without consulting a supervisor.”²⁸

The site visit report prepared by the Program Specialists evaluates the provider’s compliance with the SOS, and may contain recommendations, including recommendations about contract renewal.²⁹ Some of the report is qualitative, and the Program Specialists are “given latitude to exercise professional judgment.”³⁰ Their supervisor and other managers refer to these documents when making decisions about budgets, funding, and contract renewals, and discuss the documents with the Program Specialist.³¹ During the year before the expiration of the contract, the Program Specialists solicit a renewal SOS from the program and review it “to determine whether any proposed changes are appropriate and feasible.”³² Although the renewal

²⁴ An SOS sets forth, among other things, the terms of the contract between DOHMH and the provider, the area of delivery, the staffing pattern, the activities and services to be provided, and the required outcomes, performance goals, and measurements. Report and Recommendation of Patricia McM. Bartels, May 20, 2013 at 5-6 (“Bartels Report”).

²⁵ An LOS includes productivity measures such as number of client contacts, staff hours, and admissions and bed days for in-patient programs. *Id.* at 6.

²⁶ Some Program Specialists are assigned exclusively to program management; others, including Schwartz, Rosen, and Wilson, also have other duties.

²⁷ *Id.* at 7.

²⁸ Major changes are submitted to a supervisor for review, but testimony indicated that the Program Specialist’s judgment is “rarely overridden.” *Id.* at 8.

²⁹ *Id.* at 8, 10.

³⁰ *Id.* at 9.

³¹ *Id.* at 8-9. In fact, a DOHMH witness testified that “the Program Specialist’s recommendation that a particular contract be spared, or whether a program should continue at a particular level, is persuasive.” *Id.* at 11.

³² *Id.* at 9.

proposal is reviewed by a supervisor for overall quality, the Program Specialists' judgment is "rarely overridden"³³ and is relied upon "heavily."³⁴

During the hearing, the appellants conceded their work involves non-ministerial contracting duties. Rosen and Wilson "confirmed that they make recommendations as to renewal" of contracts;³⁵ Rosen conceded he reviews budget modification requests and gives his opinion to a supervisor;³⁶ Clipper explained that her supervisor would know whether to approve a program change because she "would report to him either verbally or in writing;"³⁷ and Schwartz admitted she "make[s] determinations about quality of services."³⁸

The Board first concludes that Clipper, Flores, Pardon, Rosen, Schwartz, and Wilson's work recommending contract renewals and budget modification requests involves them in negotiating or determining the substantive content of a contract or lease, or recommending or determining whether or to whom a lease or contract should be awarded or granted, or approving a contract or change order. Therefore, their role falls squarely within Administrative Code § 12-110(b)(3)(a)(4) and Board Rules §§ 1-15(a)(4), (5) and (6), and they perform the duties outlined in those provisions.

To be exempted from the filing requirement, a public servant involved in contracting responsibilities must perform only ministerial tasks.³⁹ Although Clipper, Flores, Pardon, Rosen, Schwartz, and Wilson are supervised, and did not have final approval authority, their supervisors relied on their contacts with the providers and expertise about the programs to the extent that Clipper, Flores, Pardon, Rosen, Schwartz, and Wilson effectively recommended approval contract renewals for and budget modification requests of the providers they oversaw. Therefore, their duties were not merely ministerial; and Clipper, Flores, Pardon, Rosen, Schwartz, and Wilson are required to file an annual disclosure report for calendar year 2011.

Elliot Greene, Beth Hoffman, Terry Jacobson, and Joanne L. Morey

Elliott Greene, Beth Hoffman, Terry Jacobson, and Joanne L. Morey work in the Office of Program Review and Evaluation; their civil service title is Special Consultant II and their office title is Program Evaluation Specialist. They audit DOHMH service providers and make unannounced visits to evaluate the providers' programs. They perform their audits in accordance with established Workbook standards, and they complete documentation such as Case Record

³³ *Id.*

³⁴ *Id.* at 10. In fact, there was no evidence at the hearing establishing "any attempt to independently verify the accuracy of the Appellants' site visit reports." *Id.* at 13.

³⁵ *Id.* at 10.

³⁶ *Id.*

³⁷ *Id.* at 11.

³⁸ *Id.* at 14.

³⁹ Board Rules § 1-15(b).

Reviews and program audits. Their work is supervised, and reports based on the auditors work are not submitted to the providers until approved and finalized by supervisors.⁴⁰

At the hearing, DOHMH argued that the auditors “should file annual financial reports because their evaluations of contractor performance is entered into the City’s Vendex system”⁴¹ and because “their evaluation of performance by contractors may be tainted by bias; and ‘it is always possible’ that bias will find its way to persons who negotiate contracts or recommend or determine whether a contract should be granted.”⁴² However, testimony adduced at the hearing did not explain what role the auditors’ reports played in the agency arriving at a Vendex final performance score or how the Vendex score is used to decide contract renewals;⁴³ and DOHMH did not assert that the auditors were involved in contracting but only that they “have the capacity to influence the behavior of persons who do recommend or negotiate contracts.”⁴⁴ The arbitrator correctly concluded that DOHMH’s argument was speculative and that there was no evidence in the record that the auditors were involved in contracting duties. Accordingly, Greene, Hoffman, Jacobson, and Morey are not required to file an annual disclosure report for calendar year 2011.

Conclusion

Board Rules § 1-15 was enacted to, among other things, “limit financial disclosure filing to those public servants who are at risk of conflicts of interests ... [and] to ensure that rules for determining who is a ‘contract’ filer are uniform and uniformly applied throughout the City.”⁴⁵ Those objectives are furthered by requiring John Acito, Lisa Bernard, John Gonzalez, Pamela Clipper, William Flores, Pilar Pardon, Jeffrey Rosen, Lydia Schwartz, and Elaine Wilson to file annual disclosure reports, and by concluding that Retha Boston, Sandra Piggee, Elliot Greene, Beth Hoffman, Terry Jacobson, and Joanne L. Morey are not required to file annual disclosure reports.

The work performed by John Acito, Lisa Bernard, John Gonzalez, Pamela Clipper, William Flores, Pilar Pardon, Jeffrey Rosen, Lydia Schwartz, and Elaine Wilson is the type that might pose a conflict of interest. No DOHMH employee should, for example, be recommending or approving contract renewals or budget modification requests, or recommending or determining to whom contracts should be awarded or renewed, where the employee has a financial relationship with the provider or an employee of the provider who is involved with the program the DOHMH employee oversees. To determine whether such financial relationships exist, and thus to avoid such conflicts of interest violations, is precisely why annual disclosure by

⁴⁰ Greene described his work as contract compliance. Report and Recommendation of Earl Pfeffer in the Matter of Greene et. al., May 20, 2013 at 10 (“Pfeffer Greene Report”).

⁴¹ *Id.*

⁴² *Id.* at 11.

⁴³ *Id.* at 7.

⁴⁴ *Id.* at 11.

⁴⁵ Conflicts of Interest Board Notice, The City Record, January 30, 2004, at 276.

these employees is crucial and is required.⁴⁶ As Arbitrator Bartels noted, these DOHMH employees are virtually the only contact between DOHMH and the providers they oversee, so the potential for impropriety exists.⁴⁷

WHEREFORE, IT IS HEREBY ORDERED, pursuant to Administrative Code §12-110(b)(3)(a)(4), that John Acito, Lisa Bernard, Pamela Clipper, William Flores, John Gonzalez, Pilar Pardon, Jeffrey Rosen, Lydia Schwartz, and Elaine Wilson file an annual disclosure report for calendar year 2011 within thirty days after receipt of this order; and

IT IS FURTHER ORDERED, pursuant to Administrative Code §12-110(b)(3)(a)(4), that John Acito, Lisa Bernard, John Gonzalez, Jeffrey Rosen, and Lydia Schwartz file an annual disclosure report for calendar year 2012 within thirty days after the deadline for filing the 2011 financial disclosure report;⁴⁸ and

⁴⁶ The Board has previously found that disclosure is required for contracting personnel whose duties include verifying information in contract documents when that information is not checked by others or is relied on in the contracting process. *See Matter of Acevedo et. al.*, FD Order No. 2013-1 (April 10, 2013) at 6 (certification of measurements that affect the price of a lease that is not checked by a supervisor requires the filing of an annual disclosure report). It has also found that personnel whose duties involved settling claims against the City or recommending the settlement of such claims are contract filers required to file annual disclosure reports pursuant to Ad. Code 12-110(b)(3)(a)(4) and Board Rules § 1-15. *See Matter of Horne, et. al.*, FD No. 2012-3 (September 20, 2012) (conciliators in the Department of Finance's Conciliation Bureau who negotiate or recommend the resolution of a tax dispute with a taxpayer are required to file an annual disclosure report); *Matter of Tirado, et. al.* (July 14, 2009) (Claims Specialists in the Comptroller's Office who negotiated settlements in the amount of up to \$2,000 are required to file an annual disclosure report because negotiating such a claim is the negotiation of a contract requiring the filing of an annual disclosure report), *aff'd, Tirado v. New York City Conflicts of Interest Board*, Index No. 112955/2009 (Sup. Ct. N.Y. Cty. 7/1/10).

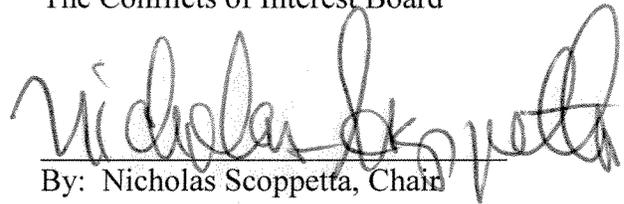
⁴⁷ Bartels Report at 15-16.

⁴⁸ Except for Pilar Pardon, who has filed a report in 2013 for calendar year 2012, the Special Consultants have also appealed the designation by DOHMH as required filers of 2012 annual disclosure reports, which are filed in 2013. In support of that appeal, they cited their appeals of the designation as required filers of a 2011 annual disclosure report and the arbitrators' reports in this matter. Contrary to the allegations set forth by Acito and Bernard, DOHMH's decision as to each of them was timely; however, the agency's decision was premature as to Clipper and Flores because the agency did not give those employees the full 14-day period to submit documents in support of their appeal; accordingly, their appeal of the designation to file an annual disclosure report for calendar year 2012 is granted on default for calendar year 2012 only. *See Matter of Delisi*, FD Order 2013-2 (August 22, 2013); *Matter of Acito, et.al*, footnote 2, *supra*; Financial Disclosure Appeals Process E(5). Accordingly, except for Clipper, Flores, and Pardon, the determination of this appeal also applies to the Special Consultants' appeals of the designation as required filers of a 2012 annual disclosure report.

IT IS FURTHER ORDERED, pursuant to Administrative Code §12-110(b)(3)(a)(4), that Retha Boston, Sandra Piggee, Elliot Greene, Beth Hoffman, Terry Jacobson, and Joanne L. Morey are not required to file an annual disclosure report for calendar year 2011 “or in future years until or unless the employee’s title, position, duties, or responsibilities change such that he or she should be a required filer.”⁴⁹

John Acito, Lisa Bernard, John Gonzalez, Pamela Clipper, William Flores, Pilar Pardon, Jeffrey Rosen, Lydia Schwartz, and Elaine Wilson each have the right to appeal this Order to the Supreme Court of the State of New York.

The Conflicts of Interest Board



By: Nicholas Scoppetta, Chair

Anthony Crowell
Andrew Irving
Burton Lehman
Erika Thomas-Yuille

Dated: September 26, 2013

Cc: John Acito
Lisa Bernard
Retha Boston
Pamela Clipper
William Flores
John Gonzalez
Elliot Greene
Beth Hoffman
Terry Jacobson
Joanne L. Morey
Pilar Pardon
Sandra Piggee
Jeffrey Rosen
Lydia Schwartz
Elaine Wilson

Jorge Martinez, DOHMH
Martha Robinson, DOHMH

⁴⁹ Financial Disclosure Appeals Process § D14.

Christine Simon, DOHMH

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