



LAW DEPARTMENT

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ALLEN G. SCHWARTZ,  
*Corporation Counsel*

MAR 13 1981

OPINION No. 13-81

Hon. Gillian Martin Sorensen  
Commissioner, New York City Commission  
for the United Nations and the Consular Corps  
809 United Nations Plaza  
New York, New York 10017

Dear Ms. Sorensen:

You have asked for my advice as to whether it would be proper for you to accept speaking engagements on a regular basis and for which you receive an honorarium.

As stated in your letter dated March 6, 1981 and subsequent telephone conversation with a member of my staff, you have received an offer from a speaker's agency which desires to book you as a speaker before various civic, community and social groups. Your talks would relate to the presence of the diplomatic community in New York and your perspective as Commissioner of the City Commission for the United Nations and the Consular Corps. You anticipate that the talks would be delivered during lunch hours or in the evenings, although some may be given during regular business hours. You estimate that the number of speaking engagements would not exceed two per month.

As an unsalaried appointee, section 1100 of the City Charter, which provides that every head of an agency who receives a salary shall give her whole time to her duties and not engage in any other occupation, does not apply to you. However, even in cases where §1100 is applicable, the Corporation Counsel has consistently advised that delivery of an occasional lecture or speech by an agency head is not prohibited by the statute. (See e.g. Opinion No. 22-80, dated April 30, 1980, copy attached). Accordingly, there is no legal objection to your accepting speaking engagements of the kind and number you have described, provided, of course, that they do not interfere with the effective performance of your duties.

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You should, however, refuse to accept any compensation in return for your speaking services where, because of the sponsor's dealings with the Commission or other City agency, your action would create a conflict of interest or the appearance of impropriety. The advice of the Board of Ethics should be sought in cases where you have any doubt as the appropriateness of a particular engagement.

Sincerely,



Corporation Counsel