



Kenneth W. Jenkins  
County Executive

Department of Law

John M. Nonna  
County Attorney

To: Sunday Vanderberg  
Clerk and Chief Administrative Officer  
Board of Legislators

From: Maximilian C. Zorn *mcz*  
Assistant County Attorney

Re: An Act authorizing the County of Westchester to enter into an agreement with Charles Luke Brussel to serve as both independent consultant and special counsel to the Westchester County Board of Ethics, commencing upon execution and continuing for three (3) years thereafter, in an amount not to exceed \$90,000.00.

Date: September 29, 2025

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Enclosed please find the following documents related to the referenced legislation:

- 1) One (1) original Transmittal Letter to the BOL from the County Attorney  
One (1) original Fiscal Impact Statement  
One (1) backup legislation (Committee Report, etc.); and
- 2) Two (2) copies including Fiscal Impact Statement and backup legislation.

Please contact me if you have any questions (5-3380). Otherwise, it is my understanding that the package should be placed on the Board's agenda for the next scheduled BOL meeting.

Thank you for your attention to this matter.

MCZ/mcz  
Enclosures





Kenneth W. Jenkins  
County Executive

Department of Law

John M. Nonna  
County Attorney

September 26, 2025

Westchester County Board of Legislators  
800 Michaelian Office Building  
White Plains, New York 10601

Dear Honorable Members of the Board of Legislators:

Transmitted herewith is an Act which, if adopted by your Honorable Board, would authorize the County of Westchester (the "County") to enter into an agreement ("Agreement") with Charles Luke Brussel ("Mr. Brussel"), pursuant to which Mr. Brussel will serve as both independent consultant and special counsel to the Westchester County Board of Ethics (the "BOE"), in an "of Counsel" capacity to the Westchester County Attorney ("County Attorney"). The term of the Agreement will commence upon execution and continue for three (3) years thereafter, in an amount not to exceed \$90,000.00.

Pursuant to Chapter 883 of the Laws of Westchester County, the BOE is required to, *inter alia*, hire an "independent consultant" to (1) review all annual financial disclosure statements to consider whether County officers and employees are in compliance with the Code, or have any financial involvement or outside employment in a business or organization that may impair their ability to fairly and impartially perform their duties as County officers or employees; (2) create a draft intra-agency report for the BOE regarding any potential non-compliance or conflicts of interest; and (3) create a draft master list of County vendors, contractors, and consultants (the "Services").

The independent consultant will also serve as special counsel to the BOE, who, in functioning in an "of Counsel" capacity to the County Attorney, will be required to provide the following additional services: conduct ethics training sessions as required by Chapter 883; develop and assist the BOE's Secretary in posting information and materials to the BOE's webpage; attend meetings of the BOE and provide ethics advice and guidance to the BOE and to County officers and employees, as requested; draft advisory opinions for the BOE and the Office of the County Attorney; develop due process procedures for investigations conducted by the BOE; assist the BOE in conducting investigations and administrative hearings; assist the Chair of the BOE at the conclusion of investigations conducted by the BOE, with drafting findings of fact and conclusions of law for consideration and adoption by the BOE; advise on records access for the BOE and serve as records access officer for the BOE; and perform related services as required (the "Additional Services").

As your Honorable Board may recall, from August 1, 2014 through July 31, 2025, Steven G. Leventhal served as both independent consultant and special counsel to the BOE.

Michaelian Office Building  
148 Martine Avenue  
White Plains, New York 10601

Telephone: (914)995-2660



The BOE, pursuant to Chapter 883 of the Laws of Westchester County, has now selected Mr. Brussel to perform independent consultant services and assume the role of special counsel to the BOE, serving in an "of Counsel" capacity to the County Attorney.

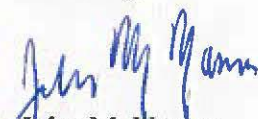
Mr. Brussel has extensive experience leading legal, ethics, compliance, and risk management programs and investigations for diverse global organizations, facing a wide range of risks. Mr. Brussel has served as Global Head of Anti-Corruption and Government Compliance with General Electric, as Chief Ethics & Compliance Officer and Corporate Counsel for Thomson/Cengage Learning, and as lead counsel for the Gale Group, the global online leader in digital research and reference solutions. Mr. Brussel has also served as Vice President in Compliance for First Data (now Fiserv), a leading FinTech company, as Compliance Counsel for the Bank of Norway, and as Interim EMEA Compliance Counsel for Marriott International. Mr. Brussel has also taught internal investigations and governmental and private sector organizational ethics, risk, and crisis management at Fordham Law School for nearly a decade.

In light of Mr. Brussel's expertise and experience in the field of government ethics, including numerous lectures, speaking engagements, and publications on the topic, authority is requested to enter into an agreement with Mr. Brussel. Pursuant to this Agreement, Mr. Brussel will serve as both independent consultant and special counsel to the BOE, in an "of Counsel" capacity to the County Attorney, for the period commencing retroactively on August 1, 2025 and continuing through July 31, 2028, at a cost not to exceed \$90,000.00, payable at the rate of \$295.00 per hour plus reasonable and necessary out-of-pocket expenses (including but not limited to mailing costs, copying and tolls, but excluding mileage, lodging and meals).

It should be noted that the Agreement is exempt from the Westchester County Procurement Policy & Procedures, pursuant to Section 3(a)(x) thereof, which exempts from procurement contracts "for the services of lawyers."

Accordingly, I most respectfully recommend your Honorable Board's approval of the attached Act.

Sincerely,



John M. Nonna  
County Attorney

JMN/MCZ/mcz

**HONORABLE BOARD OF LEGISLATORS  
THE COUNTY OF WESTCHESTER**

Your Committee is in receipt of a communication from the County Attorney recommending the enactment of an Act which, if adopted by this Honorable Board, would authorize the County of Westchester (the "County") to enter into an agreement ("Agreement") with Charles Luke Brussel ("Mr. Brussel"), pursuant to which the Mr. Brussel will serve as both independent consultant and special counsel to the Westchester County Board of Ethics (the "BOE"), in an "of Counsel" capacity to the Westchester County Attorney ("County Attorney"). The term of the Agreement will commence upon execution and continue for three (3) years thereafter, in an amount not-to-exceed \$90,000.00.

Your Committee is advised that pursuant to Chapter 883 of the Laws of Westchester County, the BOE is required to, *inter alia*, hire an "independent consultant" to (1) review all annual financial disclosure statements to consider whether County officers and employees are in compliance with the Code, or have any financial involvement or outside employment in a business or organization that may impair their ability to fairly and impartially perform their duties as County officers or employees; (2) create a draft intra-agency report for the BOE regarding any potential non-compliance or conflicts of interest; and (3) create a draft master list of County vendors, contractors, and consultants (the "Services").

Your Committee is further advised that the independent consultant will also serve as special counsel to the BOE, who, in functioning in an "of Counsel" capacity to the County Attorney, will be required to provide the following additional services: conduct ethics training sessions as required by Chapter 883; develop and assist the BOE's Secretary in posting information and materials to the BOE's webpage; attend meetings of the BOE and provide ethics advice and guidance to the BOE and to County officers and employees, as requested; draft advisory opinions for the BOE and the Office of the County Attorney; develop due process procedures for investigations conducted by the BOE; assist the BOE in conducting investigations and administrative hearings; assist the Chair of the BOE at the conclusion of investigations conducted by the BOE, with drafting findings of fact and conclusions of law for consideration and adoption by the BOE; advise on records access for the BOE and serve as records access officer for the BOE; and perform related services as required (the "Additional Services").

As your Honorable Board may recall, from August 1, 2014 through July 31, 2025, Steven G. Leventhal served as both independent consultant and special counsel to the BOE.

The BOE, pursuant to Chapter 883 of the Laws of Westchester County has now selected Mr. Brussel to perform independent consultant services and assume the role of special counsel to the BOE, serving in an “of Counsel” capacity to the County Attorney.

Mr. Brussel has extensive experience leading legal, ethics, compliance, and risk management programs and investigations for diverse global organizations, facing a wide range of risks. Mr. Brussel has served as Global Head of Anti-Corruption and Government Compliance with General Electric, as Chief Ethics & Compliance Officer and Corporate Counsel for Thomson/Cengage Learning, and as lead counsel for the Gale Group, the global online leader in digital research and reference solutions. Mr. Brussel has also served as Vice President in Compliance for First Data (now Fiserv), a leading FinTech company, as Compliance Counsel for the Bank of Norway, and as Interim EMEA Compliance Counsel for Marriott International. Mr. Brussel has also taught internal investigations and governmental and private sector organizational ethics, risk, and crisis management at Fordham Law School for nearly a decade.

Your Committee is advised that in light of Mr. Brussel’s expertise and experience in the field of government ethics, including numerous lectures, speaking engagements, and publications on the topic, authority is requested to enter into an agreement with Mr. Brussel. Pursuant to this Agreement, Mr. Brussel will serve as both independent consultant and special counsel to the BOE, in an “of Counsel” capacity to the County Attorney, for the period commencing retroactively on August 1, 2025 and continuing through July 31, 2028, at a cost not to exceed \$90,000.00, payable at the rate of \$295.00 per hour plus reasonable and necessary out-of-pocket expenses (including but not limited to mailing costs, copying and tolls, but excluding mileage, lodging and meals).

It should be noted that the Agreement is exempt from the Westchester County Procurement Policy & Procedures, pursuant to Section 3(a)(x) thereof, which exempts from procurement contracts “for the services of lawyers.”

The Department of Planning has advised that, based on its review, the proposed agreement does not meet the definition of an action under New York State Environmental Quality Review Act and its implementing regulations 6 NYCRR Part 617 (“SEQRA”). Please refer to the

memorandum from the Department of Planning dated January 14, 2025, which is on file with the Clerk of your Honorable Board.

Please note that an affirmative vote of a majority of the voting strength of your Honorable Board is required for approval of the attached Act.

Accordingly, your Committee concurs with the County Attorney's recommendation and requests approval of the attached Act.

Dated: \_\_\_\_\_, 2025  
White Plains, New York

**COMMITTEE ON**

c:mcz 9.26.25

AN ACT authorizing the County of Westchester to enter into an agreement with Charles Luke Brussel to serve as both independent consultant and special counsel to the Westchester County Board of Ethics, commencing upon execution and continuing for three (3) years thereafter, in an amount not-to-exceed \$90,000.00.

**BE IT ENACTED** by the County Board of the County of Westchester, as follows:

**Section 1.** The County of Westchester (the "County") is hereby authorized to enter into an agreement (the "Agreement") with Charles Luke Brussel ("Mr. Brussel"), pursuant to which Mr. Brussel will serve as both independent consultant and special counsel to the Westchester County Board of Ethics ("BOE"), in an "of Counsel" capacity to the County Attorney, for a term commencing upon execution and continuing for three (3) years thereafter.

**§2.** In his capacity as independent consultant, Mr. Brussel shall (1) review all annual financial disclosure statements to consider whether County officers and employees are in compliance with the Westchester County Code of Ethics, or have any financial involvement or outside employment in a business or organization that may impair their ability to fairly and impartially perform their duties as County officers or employees; (2) create a draft intra-agency report for the BOE regarding any potential non-compliance or conflicts of interest; and (3) create a draft master list of County vendors, contractors, and consultants.

**§3.** In his capacity as special counsel, Mr. Brussel will perform the following additional services: conduct ethics training sessions as required by Chapter 883; develop and assist the BOE's Secretary in posting information and materials to the BOE's webpage; attend meetings of the BOE and provide ethics advice and guidance to the BOE and to County officers and employees, as requested; draft advisory opinions for the BOE and the Office of the County Attorney; develop due process procedures for investigations conducted by the BOE; assist the BOE in conducting investigations and administrative hearings; assist the Chair of the BOE at the conclusion of investigations conducted by the BOE, with drafting findings of fact

and conclusions of law for consideration and adoption by the BOE; advise on records access for the BOE and serve as records access officer for the BOE; and perform related services as required.

**§4.** In consideration for the aforesaid services to be rendered by Mr. Brussel to the County under the Agreement, the County shall be authorized to pay Mr. Brussel at the hourly rate of \$295.00, plus reasonable and necessary out-of-pocket expenses (including but not limited to mailing costs, copying and tolls, but excluding mileage, lodging and meals), in an amount not to exceed the aggregate sum of \$90,000.00, payable monthly.

**§5.** The County Attorney or his authorized designee, be and hereby is authorized to execute all instruments and to take all actions reasonably necessary to carry out the purposes of this Act.

**§6.** This Act shall take effect immediately.



## FISCAL IMPACT STATEMENT

SUBJECT: CL Brussel-County Board of Ethics

☐ NO FISCAL IMPACT PROJECTED

### OPERATING BUDGET IMPACT

To Be Completed by Submitting Department and Reviewed by Budget

#### SECTION A - FUND

☒ GENERAL FUND

☐ AIRPORT FUND

☐ SPECIAL DISTRICTS FUND

#### SECTION B - EXPENSES AND REVENUES

Total Current Year Expense NTE \$90,000.00

Total Current Year Revenue \$

Source of Funds (check one): ☒ Current Appropriations ☐ Transfer of Existing Appropriations

☐ Additional Appropriations ☐ Other (explain)

Identify Accounts: 101\_18\_1000\_4923

Potential Related Operating Budget Expenses: Annual Amount N/A

Describe: An Act authorizing the County to enter into an agreement with Charles Luke Brussel to serve as both independent consultant and special counsel to the Westchester County Board of Ethics, commencing upon execution and continuing for 3 years thereafter for a NTE amount of \$90,000.00

Potential Related Operating Budget Revenues: Annual Amount N/A

Describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Anticipated Savings to County and/or Impact on Department Operations:

Current Year: N/A

Next Four Years: N/A

Prepared by: Patricia Haggerty

Title: Sr. Budget Analyst

Department: Budget

Date: September 29, 2025

Reviewed By: 

04

Budget Director

Date: 9/29/25