

WESTCHESTER COUNTY

Kenneth W. Jenkins
County Executive

Department of Law

John M. Nonna
County Attorney

Date: June 29, 2026

To: The Honorable Members of the Board of Legislators

From: John M. Nonna, County Attorney *s/JMN*

RE: An Act Authorizing Westchester County To Enter Into An Agreement With Steven G. Leventhal To Serve As Both Independent Consultant And Special Counsel To The Westchester County Board Of Ethics

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 (the "Agreement") with Steven G. Leventhal ("Mr. Leventhal") pursuant to which Mr. Leventhal 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 (the "County Attorney"). The term of the Agreement will commence on August 1, 2026 and continue through July 31, 2029, 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 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 ethics advice and guidance to the BOE, the County Attorney and County officers and employees and will perform related services, as required.

The BOE, pursuant to Chapter 883 of the Laws of Westchester County, has now selected Mr. Leventhal 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. Leventhal has been providing the County with ethics services since 2014, and has extensive experience leading legal, ethics, compliance, and risk management programs and investigations. In light of Mr. Leventhal'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. Leventhal. Pursuant to the proposed Agreement, Mr. Leventhal 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 on August 1, 2026 and continuing through July 31, 2029, in an amount not to exceed \$90,000.00, payable monthly at the rate of \$325.00 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 and 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 proposed Act.

JMN/JA/mcz
Attachments

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

Your Committee is in receipt of a proposed Act transmitted by the County Attorney, which, if adopted by your Honorable Board, would authorize the County of Westchester (the “County”) to enter into an agreement (the “Agreement”) with Steven G. Leventhal (“Mr. Leventhal”) pursuant to which Mr. Leventhal 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 (the “County Attorney”). The term of the Agreement will commence on August 1, 2026 and continue through July 31, 2029, in an amount not to exceed \$90,000.00.

The County Attorney has advised your Committee 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 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 ethics advice and guidance to the BOE, the County Attorney and County officers and employees and will perform related services, as required.

Your Committee is advised that the BOE, pursuant to Chapter 883 of the Laws of Westchester County, has now selected Mr. Leventhal 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. Leventhal has been providing the County with ethics services since 2014, and has extensive experience leading legal, ethics, compliance, and risk management programs and investigations. In light of Mr. Leventhal’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. Leventhal. Pursuant to the proposed Agreement, Mr. Leventhal 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 on August 1, 2026 and continuing through July 31, 2029, in an amount not to exceed \$90,000.00, payable at the rate of \$325.00 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).

Your Committee is advised that the Agreement is exempt from the Westchester County Procurement Policy and 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 9, 2026, 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: _____, 2026
White Plains, New York

FISCAL IMPACT STATEMENT

SUBJECT: Steven G. Leventhal -County Board of Ethics

NO FISCAL IMPACT PROJECTED

OPERATING BUDGET IMPACT

SECTION A - FUND

<input checked="" type="checkbox"/>	GENERAL FUND	<input type="checkbox"/>	AIRPORT FUND	<input type="checkbox"/>	SPECIAL DISTRICTS FUND
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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
 Additional Appropriations 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 Steven G. Leventhal to serve as both independent consultant and special counsel to the Westchester County Board of Ethics, commencing on August 1, 2026 and continuing through July 31, 2029 in an amount NTE \$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: 06/24/2026

Approved by: Lawrence Soule
Digitally signed by Lawrence Soule
Date: 2026.06.25 10:43:30 AM EDT

Budget Director

Date: 06/24/2026

ACT NO. 2026 - _____

AN ACT authorizing the County of Westchester to enter into an agreement with Steven G. Leventhal to serve as both independent consultant and special counsel to the Westchester County Board of Ethics, commencing on August 1, 2026 and continuing through July 31, 2029, 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 Steven G. Leventhal (“Mr. Leventhal”) pursuant to which Mr. Leventhal shall 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 (the “County Attorney”), for a term commencing on August 1, 2026 and continuing through July 31, 2029.

§2. In his capacity as independent consultant, Mr. Leventhal 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. Leventhal shall provide ethics advice and guidance to the BOE, the County Attorney and County officers and employees and will perform related services, as required.

§4. In consideration for the aforesaid services to be rendered by Mr. Leventhal to the County under the Agreement, the County shall be authorized to pay Mr. Leventhal at the hourly rate of \$325.00, 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 duly authorized designee is hereby authorized and empowered to execute and deliver all instruments and to take any and all actions necessary or appropriate to effectuate the purposes hereof.

§6. This Act shall take effect immediately.