



## Division of Human Rights

KATHY HOCHUL  
Governor

MARIA L. IMPERIAL  
Commissioner

September 9, 2022

VIA EMAIL [G@xny.io](mailto:G@xny.io)

Gunnar Larson  
xNY.io

Dear Mr. Larson:

This is in response to your Freedom of Information Law (FOIL) request, received by the Division on March 16, 2022, in which you requested a copy of the following:

We would like to receive any and all records related to New York State and NY-DFS' approach to enforcement of "Permission for Interlocking Directors and Officers" as per outlined here: [https://www.dfs.ny.gov/apps\\_and\\_licensing/banks\\_and\\_trusts/other/Permission\\_for\\_Interlocking\\_Directors\\_and\\_Officers](https://www.dfs.ny.gov/apps_and_licensing/banks_and_trusts/other/Permission_for_Interlocking_Directors_and_Officers)

In addition, we would like to receive any and all records associated with filed permissions for interlocking directorates at the NAACP and Goldman Sachs, specific to Mr. Rose (<https://naacp.org/people/peter-rose>) and Mr. Ogunlesi (<https://www.goldmansachs.com/about-us/people-and-leadership/leadership/board-of-directors/adebayo-o-ogunlesi.html>).

Finally, we would like to receive any and all records related to NY-DFS monitoring of Goldman Sachs' minority scholarship fund support in Africa (and how any non-approved interlocking directorates may be engaged in AML violations).

To the extent that your request is reasonably described, please be advised that the New York State Division of Human Rights does not have any records in its possession responsive to your FOIL request.

Any person denied access to a requested record may, within thirty (30) days of the denial, appeal the denial in writing by mail or fax to Caroline J. Downey, General Counsel, N.Y.S. Division of Human Rights, One Fordham Plaza, 4th Floor, Bronx, New York 10458.

Very truly yours,

A handwritten signature in black ink, appearing to read "Siaka Paasewe". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Siaka Paasewe  
FOIL Officer