

NEW YORK STATE COMMISSION ON ETHICS
AND LOBBYING IN GOVERNMENT

In the Matter of

Geneanne Keegan-Smith,

Respondent.

SETTLEMENT AGREEMENT

COELIG Case No. 22-155

1. This settlement agreement is entered into by and between the New York State Commission on Ethics and Lobbying in Government (the "Commission") and Geneanne Keegan-Smith (the "Respondent").
2. The Commission is the New York State agency responsible for administering and enforcing §§ 73 and 74 of the New York State Public Officers Law ("POL").
3. This memorandum of agreement constitutes the entire agreement between the Commission and the Respondent. There are no promises, agreements, or conditions, express or implied, other than those set forth in this document. No modification, deletion, or addition to this agreement will be valid or binding on either party unless put into writing and signed by all parties.
4. This agreement shall become effective upon execution by the Commission, or its designee, and it is understood that this agreement is not confidential and will be made public in accordance with the provisions set forth in Executive Law §§ 94(10)(p)(ii), (12)(a)(iii), and (13)(b), and 19 NYCRR Part 941.16.
5. The Respondent has agreed to resolve this matter in a manner that avoids additional administrative and/or adjudicatory proceedings. As such, the Respondent stipulates to the following facts and conduct:
 - a. The Respondent was employed as the Concessions and Exhibits Manager for the New York State Department of Agriculture and Markets ("Agriculture") at the New York State Fair (the "State Fair"). The Respondent worked for Agriculture from 1993 until her resignation in May 2023.
 - b. While employed by Agriculture, the Respondent accepted and obtained nominal gifts and privileges from State Fair vendors, that was shared with other Agriculture staff, including free food, alcohol, and other goods. Further, the Respondent regularly utilized a golf cart provided by a State Fair vendor, which findings of fact were detailed in an Offices of the New York State Inspector General public report.

c. POL §§ 74(3)(d) and 74(3)(h) set forth specific standards of conduct for state officers and employees and provides, in pertinent part, that:

(d) No officer or employee of a state agency . . . should use or attempt to use his or her official position to secure unwarranted privileges or exemptions for himself or herself or others, including but not limited to, the misappropriation to himself, herself or to others of the property, services or other resources of the state for private business or other compensated non-governmental purposes.

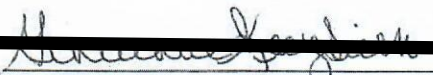
(h) An officer or employee of a state agency . . . should endeavor to pursue a course of conduct which will not raise suspicion among the public that he or she is likely to be engaged in acts that are in violation of his or her trust.

6. Respondent admits that her conduct violated POL §§ 74(3)(d) and 74(3)(h). Further, Respondent agrees to pay to the Commission \$1,000 in settlement of the said violations within thirty (30) days of the full execution of this Agreement.

7. Respondent agrees not to take any action or to make, permit to be made, authorize, or agree to any public statement denying, directly or indirectly, any finding or acknowledgment in this agreement or creating the impression that this agreement is without factual basis.

8. By signing below, Respondent acknowledges reading this agreement in its entirety, and understanding all terms and conditions of this agreement, and having done so, knowingly, voluntarily, and freely enters into this agreement. Respondent was represented by Karl Sleight, of Lippes Mathias, located at 54 State Street, Suite 1001, Albany, NY 12207.


ACCEPTED AND AGREED TO BY:



Geneanne Keegan-Smith
Respondent

10-30-25
Date

NEW YORK STATE COMMISSION ON ETHICS
AND LOBBYING IN GOVERNMENT



Sanford N. Berland
Executive Director

11/18/2025
Date