



NEW YORK CITY CONFLICTS OF INTEREST BOARD

2025 Annual Report

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nyc.gov/ethics



@NYCCOIB

Current Board Members

| | |
|-------------------------------|--|
| Milton L. Williams Jr. | Partner at Walden Macht Haran & Williams LLP. Appointed to the Board as Chair in September 2022. |
| Wayne G. Hawley | Former Deputy Executive Director and General Counsel, NYC Conflicts of Interest Board. Appointed to the Board in April 2020. |
| Ifeoma Ike | Founder and CEO of Pink Cornrows. Appointed to the Board in April 2022. |
| Stephen Loffredo | Professor of Law Emeritus at CUNY School of Law. Appointed to the Board in April 2026 |
| Amy E. Millard | Former Counsel at Clayman Rosenberg Kirshner & Linder LLP. Appointed to the Board in April 2024. |

Former Board Members

| | |
|--|---------------------------------|
| Merrell E. Clark Jr., Chair | January 1989 – September 1990 |
| Sheldon Oliensis, Chair | September 1990 – February 1998 |
| Benito Romano, Acting Chair | March 1998 – June 2002 |
| Steven Rosenfeld, Chair | June 2002 – December 2012 |
| Nicholas Scoppetta, Chair | January 2013 – February 2014 |
| Richard Briffault, Chair | March 2014 – March 2020 |
| Jeffrey D. Friedlander, Chair | April 2020 – March 2022 |
| Fernando A. Bohorquez Jr., Acting Chair | April 2022 – September 2022 |
| Beryl R. Jones | October 1989 – May 1995 |
| Robert J. McGuire | October 1989 – September 1995 |
| Benjamin Gim | September 1990 – September 1994 |
| Shirley Adelson Siegel | September 1990 – April 1998 |
| Benito Romano | September 1994 – 2004 |
| Jane Parver | September 1994 – September 2006 |
| Bruce A. Green | November 1995 – March 2004 |
| Angela Mariana Freyre | October 2002 – May 2011 |
| Monica Blum | August 2004 – March 2013 |
| Andrew Irving | April 2005 – March 2017 |
| Kevin B. Frawley | October 2006 – March 2012 |
| Burton Lehman | July 2009 – March 2014 |
| Erika Thomas | March 2012 – March 2020 |
| Anthony W. Crowell | April 2013 – November 2021 |
| Jeffrey D. Friedlander | April 2017 – March 2022 |
| Nisha Agarwal | April 2020 – March 2022 |
| Fernando A. Bohorquez Jr. | April 2014 – March 2022 |
| Georgia M. Pestana | April 2022 – November 2025 |

Board Staff

Executive

Carolyn Lisa Miller
Executive Director

Administration

Tasnia Karim
Director

Caitlyn Louie
Deputy Director

Annual Disclosure

Katherine J. Miller
Director & Special Counsel
EEO Officer & Disability Rights
Coordinator

Holli R. Hellman
Senior Annual Disclosure
Analyst

Jasmine Mack
Annual Disclosure Analyst &
Legal Coordinator

Michael Roudik
Annual Disclosure Specialist

Veronica Martinez Garcia
Administrative Assistant

Education & Engagement

Alex Kipp
Director

Rob Casimir
Senior Education &
Engagement Specialist

Kapani Kirkland
Education & Engagement
Specialist

Roy Koshy
Education & Engagement
Specialist

Enforcement

Jeffrey Tremblay
Director

Hannah Howard
Deputy Director

Anita Armstrong
Associate Counsel

Kevin Jupena
Assistant Counsel

Information Technology

Derick Yu
Director

Legal Advice

Ethan A. Carrier
General Counsel

Christopher M. Hammer
Deputy General Counsel

Maryann White
Associate Counsel

Yasong Niu
Assistant Counsel

Florence Watson
Paralegal

The New York City Conflicts of Interest Board (“COIB” or “the Board”) has four broad responsibilities:

1. Educating the approximately 325,000 current public servants of the City of New York about the requirements of Chapter 68, the City’s Conflicts of Interest Law;
2. Interpreting Chapter 68, the Lobbyist Gift Law,¹ the Affiliated Not-for-Profits Law,² and the Legal Defense Trust Law,³ through issuing waivers, promulgating rules, and responding to requests for advice, both formal and informal, from current and former public servants, lobbyists, and affiliated not-for-profits;
3. Prosecuting violations of Chapter 68, the Lobbyist Gift Law, the Affiliated Not-for-Profits Law, and the Legal Defense Trust Law in administrative proceedings; and
4. Administering and enforcing the City’s Annual Disclosure Law.⁴

This Annual Report reviews the Board’s accomplishments during 2025, under each of the following headings: (1) Legal Advice; (2) Enforcement; (3) Education & Engagement; and (4) Annual Disclosure.

¹ [Subchapter 3 of Title 2 of the New York City Administrative Code.](#)

² [Chapter 9 of Title 3 of the New York City Administrative Code.](#)

³ [Chapter 11 of Title 3 of the New York City Administrative Code.](#)

⁴ [Section 12-110 of the New York City Administrative Code.](#)

Legal Advice

The Board would always prefer to prevent a conflict of interest before it occurs. It is both the mission and the legal obligation of the Board to provide guidance to public servants who seek advice about the application of the City's Conflicts of Interest Law, the Lobbyist Gift Law, the Affiliated Not-for-Profits Law, or the Legal Defense Trust Law. And it is the Board's Legal Advice Unit that is primarily responsible for fulfilling the Board's advice-giving function.

The most important function of the Legal Advice Unit is operating the Board's Attorney-of-the-Day service, through which, in 2025, attorneys provided fast (almost always the same day), accurate, and confidential responses to 3,485 emails, calls, or webform requests from public servants seeking assistance. This service is how dedicated public servants who are making a good faith effort to comply with the City's Conflicts of Interest Law, and other laws under the Board's jurisdiction, can get necessary help in doing so. Both in terms of purpose and effort, the Attorney-of-the-Day service comprises the core of the Legal Advice Unit's work.

If the question is more complicated, or if the public servant wants or needs a more formal response, request for guidance may take one of two other tracks. First, Legal Advice Unit attorneys occasionally provide a Staff Advice letter, explaining the application of the conflicts of interest law to a public servant's question in greater depth (nine in 2025). Second, the Legal Advice Unit attorneys bring formal requests regarding complex, novel, or sensitive questions to the full five-member Conflicts of Interest Board for consideration at its monthly meetings. The Board then issues a formal Board Advice letter (two in 2025), which is subsequently published as an Advisory Opinion after the guidance is anonymized, to prevent the disclosure of any public servant or involved party, as required by the City Charter.

Often, a public servant seeks to engage in conduct that would technically violate the Conflicts of Interest Law but would not actually conflict with the purposes and interests of the City. In such circumstances, the head of that public servant's City agency may request that the Board grant a waiver (for a position or conduct) or an order (for ownership interests) to permit that public servant to engage in the otherwise prohibited conduct. The full Board has delegated to the Board Chair the authority to grant routine waivers and orders (729 granted in 2025), such as many of the requests for waivers for public servants to hold second jobs (also known as "moonlighting waivers"). Requests for waivers or orders that are complex, novel, or sensitive are reviewed by the full five-member Board (17 granted in 2025). Because they involve the Board granting an exception to the prohibitions in the Conflicts of Interest Law, the City Charter requires that all waivers and orders are public documents.

Ethics Liaison Training

The Legal Advice Unit continued its “Friday Fifteen” program, a weekly 15-minute live video conference training program aimed at teaching City attorneys about the nuts and bolts of the Conflicts of Interest Law and best practices for handling Chapter 68 matters. This program, which was an innovation during the Covid-19 pandemic, has become a mainstay of the Legal Advice Unit’s training and outreach efforts.

Rulemaking

The Legal Advice Unit continued its work supporting the Board’s rulemaking agenda. In 2025, the Board engaged in two rulemaking efforts, holding eight open meetings and two public hearings:

- The Board amended the so-called “contract filer” rule in Board Rules Chapter 4. The changes clarified and somewhat narrowed the category of public servants who are required to file annual disclosure reports pursuant to City Administrative Code § 12-110(b)(3)(a)(4) because of their roles in City procurement, concessions, franchises, real property leases, revocable consents, or zoning.
- The Board also proposed amendments to the reporting requirements of donations to the City, including the reporting of gifts such as gifts of travel and travel-related expenses for City business travel under Board Rules § 1-14, the Official Fundraising Rule, and Board Rules § 1-01(h), the exception in the Valuable Gifts Rule permitting the acceptance of gifts of travel and travel-related expenses.

Legal Defense Trust Law

Two legal defense trusts operated in 2025. A considerable number of staff hours were dedicated to administering the reporting requirements of this law, much of which time was spent solving (or working around) problems arising from the limitations of the electronic reporting system the Board was able to procure within its limited budget when the City Council entrusted the Board with the responsibility of administering this law but allocated no resources for doing so.

By the Numbers:

| | Public/Private | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
|--|----------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Board Waivers and Ownership Interest Orders | Public | 8 | 50 | 33 | 32 | 31 | 13 | 17 |
| Chair Waivers and Ownership Interest Orders (Charter §§ 2604(a)(4) and 2604(e))¹ | Public | 649 | 395 | 330 | 580 | 814 | 679 | 708 |
| Chair Waivers (Board Rules §§ 1-13(c) and 1-13(e)(2))² | Public | 17 | 4 | 10 | 7 | 13 | 21 | 21 |
| Board Advice Letters | Private | 13 | 6 | 12 | 12 | 6 | 11 | 2 |
| Staff Advice Letters | Private | 55 | 15 | 17 | 35 | 11 | 19 | 9 |
| Attorney-of-the-Day Advice | Private | 4,871 | 3,398 | 3,323 | 3,939 | 4,075 | 3,595 | 3,485 |
| Cases Pending at Year End | | 105 | 88 | 92 | 119 | 107 | 71 | 112 |
| Median Days from Request to Chair Waiver and/or Ownership Interest Order | | 57 | 53 | 60 | 41 | 28 | 35 | 30 |

¹ A “waiver” is a letter in which, with the written approval of the relevant agency head, the Board authorizes a current or former public servant to engage in conduct that would otherwise violate Chapter 68. Most waivers are for second jobs with firms doing business with the City, known as “moonlighting waivers.” Charter Section 2604(e). An “order” is similar to a waiver but is for a public servant’s ownership interest in a firm. Charter § 2604(a)(4).

² A Board Rules Section 1-13(c) waiver is specific to permitting a public servant to use a small amount of City time or City resources (but not City letterhead or email) for certain charitable volunteer work, such as providing *pro bono* legal services. A Board Rules Section 1-13(e) waiver is specific to permitting a public servant to perform work for a City not-for-profit as part of their City duties, such as when an agency head serves on the board of a not-for-profit affiliated with their City agency.

Enforcement

Vigorous and fair enforcement of the Conflicts of Interest Law is essential to promoting a culture of compliance throughout City government. The Board's Enforcement Unit ensures that violators of the law are held accountable for their violations through public dispositions and the imposition of monetary fines of up to \$25,000 per violation.

Before it can commence an enforcement action, the Board must first receive a complaint—a report of a potential violation. Complaints can be submitted by anyone and can be anonymous. In 2025, the Enforcement Unit received the most complaints—537—in its history, a nearly 50% increase from 2024. **A record number of complaints** is a positive development for the Board's mission; more complaints reflect greater awareness of the Board's enforcement work and enable the Board to address more violations. Achieving this record is the culmination of longstanding efforts by the Board to ensure that public servants and the general public are aware of what the law covers and how they can report a potential violation.

But this unprecedented number of complaints came at a difficult time for the Enforcement Unit. A unit of only four when fully staffed, the Enforcement Unit operated with a staff of three for nearly all of 2025, due largely to the Board being denied budgetary authority to fill a longstanding vacancy. This staff shortage resulted in more work for the remaining attorneys in the Unit, as well as delays in the prosecution of some cases.

Still, the Enforcement Unit persevered to accomplish its vital mission. In 2025, the Board made 43 public findings of violations and collected more than \$260,000 in fines, **the highest fine total in its history**.

This record collection was due in significant part to a settlement reached by the Board with former Mayor Bill de Blasio in May 2025. This settlement resolved litigation related to the Board's finding that de Blasio misused City funds to pay for the travel expenses of his NYPD security detail to accompany him on out-of-state trips related to his 2019 presidential campaign. In the settlement, de Blasio agreed to pay the Board \$329,794.20 in installments over four years, thereby paying back the City in full for the travel expenses incurred by the security detail, along with an additional \$10,000 fine for his violations. In accordance with the settlement, de Blasio paid \$143,114.20 to the Board in 2025.

By the Numbers:

| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
|--|-----------------|-----------------|-----------------|------------------|------------------|---------------------|
| Complaints Received | 203 | 256 | 287 | 288 | 361 | 537 |
| DOI/SCI Reports Received | 107 | 105 | 84 | 77 | 72 | 95 |
| Public Findings of Violations¹ | 55 | 38 | 42 | 40 | 46 | 43 |
| Fines Collected | \$67,450 | \$59,825 | \$94,750 | \$79,700 | \$189,346 | \$260,614.20 |
| Fines Imposed | \$90,750 | \$76,075 | \$88,725 | \$302,350 | \$222,446 | \$139,500 |

¹ Public findings of violations include settlements in which respondents agree to pay fines to the Board, Board Orders imposing fines after hearings, and public warning letters issued to respondents with no accompanying fine.

Notable Cases

The Enforcement Unit addressed multiple serious violations of the Conflicts of Interest Law in 2025. Some common subject matters in 2025 included:

Political Activities

The Conflicts of Interest Law contains numerous prohibitions that restrict how and when public servants engage in partisan political activities. These restrictions ensure that public servants keep political campaigns separate from their public service.

- In August 2024, the Commissioner of the New York City Department of Transportation (“DOT”) Ydanis Rodriguez delivered remarks from the stage at a DOT Summer Streets event in the Bronx in which he urged the assembled crowd to support Kamala Harris for President. Through his conduct, the Commissioner used City time and City resources for a prohibited campaign purpose. The DOT Commissioner agreed to pay a \$1,750 fine to resolve these violations (COIB Case No. 2024-669).
- In February 2024, the New York City Police Department (“NYPD”) designated an Assistant Commissioner in the Liaison Unit as a public servant charged with substantial policy discretion (“policymaker”). In March 2024, the Assistant Commissioner received a written notice from Board Staff advising him that, as a policymaker, he was prohibited from soliciting donations for candidates for City elective office. In June 2024, the Assistant Commissioner solicited and collected 15 donations totaling \$4,100 for Mayor Eric Adams’s re-election campaign. The now-former Assistant Commissioner agreed to pay a \$5,000

fine (COIB Case No. 2024-774).

- The Chief of Staff to a City Council Member sent a text message to seven of his subordinates asking them to donate to the Council Member's reelection campaign. After receiving the text message, four of the seven subordinates made donations totaling \$200. The Chief of Staff agreed to pay a \$2,250 fine to resolve his violation of the prohibition against public servants soliciting campaign donations from their subordinates (COIB Case No. 2025-493).

Working a Second Job on City Time

The Conflicts of Interest Law prohibits public servants from performing non-City work at times when they are required to be performing work for the City.

- In addition to her City job, an Executive Project Manager at the New York City Campaign Finance Board ("CFB") had paid positions with two not-for-profit organizations and contracted to perform paid work for a third organization. The Executive Project Manager performed extensive work for these organizations at times she was required to be performing work for CFB, including attending a two-day out-of-state conference, a two-day "team retreat," a daylong "team meeting," and a half-day meeting. The Executive Project Manager agreed to pay a \$15,000 fine to resolve this and other related violations. In setting the penalty, the Board considered that she had already been terminated by CFB for her conduct (COIB Case No. 2024-535).
- An Administrator in the Emergency Management and Services Department at the New York City Housing Authority ("NYCHA") had a second job with Airbnb. Over a year and a half, the Administrator worked 1,334.5 overlapping hours at NYCHA and Airbnb, thus performing extensive work for Airbnb at times she was required to be performing work for NYCHA. The now-former Administrator agreed to pay a \$13,500 fine to resolve this and other related violations (COIB Case No. 2024-303).
- A Marine Engineer for the New York City Department of Correction ("DOC") had a second job as a General Mechanic at the Pratt Institute. The Marine Engineer worked more than 125 hours for Pratt at times when he was required to be working for DOC. The Marine Engineer agreed to pay a \$9,000 fine (Case No. 2024-086).

Post-Employment & Job-Seeking Violations

The Conflicts of Interest Law continues to apply to public servants as they seek to leave City service and even once that service has ended. Post-employment restrictions include prohibitions against seeking employment with certain firms, making compensated communications with their former agency for a prescribed period of time following the end of their City service, and working for private compensation on particular matters on which they had worked for the City.

- The Executive Director of Housing Initiatives at the Mayor’s Office of Criminal Justice (“MOCJ”) was overseeing a contract with a MOCJ vendor while she applied for and interviewed for the position of CEO at the vendor, which position she was not offered. In doing so, the Executive Director violated the prohibition against public servants seeking employment with a firm while they are working on a particular matter involving that firm. In a three-way settlement with the Board and MOCJ, the Executive Director agreed to pay a \$2,500 fine to the Board (COIB Case No. 2025-555).
- While she was overseeing a contract with National Renewable Energy Laboratory (“NREL”) for DCAS, the Senior Director applied for, interviewed for, negotiated, and accepted employment with NREL. By doing so, she violated the job-seeking prohibition. The Senior Director also continued to oversee NREL’s contract during the period between when she accepted employment with NREL and when she left DCAS, thereby misusing her City position to benefit a firm with which she was associated. Finally, she participated in a phone call with NREL about employment benefits while she was required to be performing work for DCAS and used her City email account—a City resource—to send herself an email summarizing those employment benefits. To resolve these violations, the now-former Senior Director agreed to pay a \$6,500 fine (COIB Case No. 2023-260).
- The Director of the Mayor’s Office of Contract Services (“MOCS”) and her Executive Assistant left City service to become CEO and Administrative Coordinator, respectively, at Catholic Charities Community Services (“CCCS”). Shortly after leaving City service, the former Executive Assistant sent emails to her former MOCS colleagues seeking their guidance on behalf of CCCS partners. In her emails, the former Executive Assistant wrote that she was reaching out on behalf of the former Director. To resolve their violations of the post-employment communication ban, the former Director agreed to pay a

\$2,500 fine, and the former Executive Assistant agreed to pay a \$1,000 fine. These fines took into account that the former Director had been advised by Board Staff that she was prohibited from communicating with MOCS for one year after her departure from City service. The Board also considered that the former Executive Assistant was acting at the direction of her supervisor (COIB Case Nos. 2025-446/a).

Education & Engagement

As the Board's longest-serving Executive Director, Mark Davies, was fond of saying, *"the main purpose of ethics laws lies not in punishing wrongdoing, but in preventing it, not in catching people, but in teaching them."* The City's Conflicts of Interest Law serves to build and maintain a culture where public servants seek guidance in those rare instances when there is a potential for overlap between their public duties and their private interests. The City's workforce is full of dedicated public servants with outside interests that benefit civic life: volunteering for local not-for-profits, teaching as adjunct professors, starting and running small businesses, and participating in the democratic process, just to name a few. Keeping this in mind, the messaging from the Conflicts of Interest Board starts with "Yes! Get involved in your community. Pursue your entrepreneurial dreams. Share your wisdom! And when you need help in keeping those things walled-off from your public duties, we will give you the advice that keeps you in compliance."

But how is a public servant to know when they need advice? That is the work of the Board's Education & Engagement Unit.

Training a public servant in the Conflicts of Interest Law is not a comprehensive exploration of every single violation to avoid. (Such a course would surely run much longer than an hour and probably bore a public servant into a fitful slumber.) Rather, it is an exploration of the kind of work and life situations a particular kind of public servant might encounter where questions are likely to arise. The word "gift," for example, conjures very different situations for different kinds of public servants. For a sanitation worker, it might be a tip offered by a homeowner; for a procurement specialist, it might be an invitation to a steakhouse; for a teacher it might be gift card from a parent, or a group of parents. Training is best when it is tailored to the City agency and to role, so that the target audience sees themselves reflected in the values and norms created by the law.

In an ideal world, the Education & Engagement Unit's four staff members would deliver bespoke instructor-led, interactive hour-long training sessions to every single member of the City's 300,000+ workforce once every two years. Those training sessions function as "events," almost like an interactive show. They are full of surprises, validation, compelling storytelling, and laughter.

Scheduling training for all of the employees of a large City agency can be a challenge, to say the least. For that reason, the Education & Engagement Unit works with each

agency to find solutions that can have maximum impact while imposing the fewest additional demands on agency resources. Board trainers go to every corner of the City at every time of day and night in order to reach people where they are. This might involve a community board meeting at 7:30pm, a training session for an overnight crew at 11pm, a 6:00am briefing at a DSNY garage, a 2:30pm professional development session at a Staten Island public school, or an 11am leadership retreat for the Fire Department in Croton.

With a combination of in-person visits to agencies and instructor-led webinars, the Education & Engagement Unit delivered 412 instructor-led sessions in 2025. While impressive, it is clearly not enough. To reach more people, the Unit continues to use its eLearning course, hosted on the DCAS “CityLearn” Learning Management System. Enrollees are able to learn asynchronously and track their progress. In 2025, 22,487 public servants were trained with this modality. eLearning is not without its limitations, however. Because the course was written for a general audience, it lacks the power of specificity and interactivity that bespoke instructor-led training can offer. As well, some agencies have encountered technological challenges in engaging with CityLearn. It should also be observed that, as much mandated training in various subjects increasingly manifests itself in eLearning, the medium can become tedious and lose salience.

Some small agencies can be fully trained with one or two instructor-led sessions. The entire staff of the Campaign Finance Board was trained during an all-hands meeting, for example. For larger agencies with more than one office, more complex training plans are required. Training plans are affected by geography, role, shifts worked, labor agreements, and access to computers and/or screens. Despite these headwinds, the Education & Engagement Unit was able to train the entire staffs of roughly 70% of City agencies. The Unit delivered a series of in-person sessions and instructor-led webinars to fully train the Economic Development Corporation and the City Council; the Unit used a combination of eLearning and instructor-led webinars to cover the entire staff of the Administration for Children’s Services; and it used a combination of eLearning, instructor-led webinars, and a high number of in-person sessions at the Gotham Center to train the entire staff of the Department of Mental Health and Hygiene. Some larger agencies remain difficult to reach. For example, while the Education & Engagement Unit taught 74 classes over the past two years at the Police Academy, reaching nearly 5,000 public servants, that represents only 10% of the Police Department’s headcount. The Education & Engagement Unit will continue to explore new pathways to reach NYPD and several other large City agencies that have been difficult to train on an agency-wide scale, including the Department of Education and the Department of Sanitation.

Biennial training gives public servants enough familiarity to spot potential issues. When done well, it is memorable and creates positive halo effects casting the Board as a trusted partner. To sustain interest and keep awareness sharp, the Education & Engagement Unit creates smaller doses of ethics messaging across platforms on a regular basis. In cooperation with the Mayor's Office and the Office of Technology and Innovation, the Unit now bundles its three monthly publications, The Ethical Times newsletter, the Public Service Puzzler, and COIB Small Plates, into one monthly "COIB Bulletin" that goes to the email boxes of every City employee. This has increased the potential reach of those publications from several thousand per month to several hundred thousand. The Unit also creates videos, infographics, and other assets for deployment on social media channels. These smaller messages operate on the premise of a sort of barter arrangement paid in attention: give us a small amount of attention and we'll give you something entertaining and useful about the Conflicts of Interest Law. The Unit regularly receives accolades for its creative efforts from public servants who take the time to engage. One particularly notable publication was a wholly original, playable tabletop role-playing game centered on New York City political history and conflicts of interest. The Unit also wrote short original pieces for placement in several other agency-specific newsletters, including DOHMH, FDNY, and HPD.

The Unit's Director, Alex Kipp, currently serves on the board of directors of the Council on Governmental Ethics Laws (COGEL) and also serves as Co-Chair of its Marketing & Communications Committee. At the COGEL Conference in Atlanta in December, Mr. Kipp co-hosted a Training & Communications Roundtable, led one Pedagogy workshop for COGEL professionals and led one Writing workshop for COGEL professionals. In 2025, Alex also made a number of videos to support COGEL's work and edited two editions of COGEL's newsletter, The COGEL Guardian.

By the Numbers:

| | <u>2022</u> | <u>2023</u> | <u>2024</u> | <u>2025</u> |
|---|------------------|----------------|----------------|----------------|
| Live Classes Conducted (in person and webinar) | 249 | 346 | 364 | 412 |
| Public Servants Trained | 14,113 | 18,306 | 22,471 | 23,665 |
| Agencies Visited | 37 | 55 | 48 | 49 |
| Classes before 930am/after 530pm | | | 30 | 77 |
| eLearning Class Completions | 42,833 | 33,029 | 19,812 | 22,487 |
| Agencies Participating in eLearning | 46 | 78 | 49 | 73 |
| Social Media Views | 1,256,167 | 490,128 | 25,256 | 56,196 |
| Videos Created | | | 15 | 14 |
| Unique Publications Created | | | 37 | 32 |
| Website Page Views | 127,205 | 172,231 | 173,122 | 204,348 |

Annual Disclosure

During 2025, 9,933 individuals were required to file an annual disclosure report with the Board covering calendar year 2024. The majority of those individuals—specifically, City employees and compensated members of policymaking boards or commissions—were required to file online during the annual disclosure filing period from April 7 through May 2, 2025. The Board’s Annual Disclosure Unit worked closely with over 100 agency liaisons to identify required filers, generate unique passwords for each filer, and facilitate their access to the filing website.

For uncompensated members of policymaking boards and commissions and members of local public authorities, in 2025 the AD Unit implemented a new online form. For tax assessors, the AD Unit distributed and collected a PDF fillable report from each required filer.

| | <u>2021</u> <u>Reports</u> | <u>2022</u> <u>Reports</u> | <u>2023</u> <u>Reports</u> | <u>2024</u> <u>Reports</u> |
|----------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| Reports Filed¹ | 9,996 | 10,079 | 9,601 | 9,914 |
| Filing Compliance Rate | 98% | 98.5% | 99.9% | 99.8% |

¹ The numbers in this row do not include final reports of filers leaving City service.

| <u>Filers of 2024 Reports</u> | |
|--|------------------------|
| City Employees & Compensated Members of Policymaking Boards and Commissions | 9,081 |
| Uncompensated Members of Policymaking Boards and Commissions | 2221 |
| Members of Local Public Authorities | 330¹ |
| Tax Assessors | 137² |
| Candidates | 202³ |

¹ Seven of these individuals filed another report as members of an uncompensated board or commission.

² One of these individuals filed another report as a City employee.

³ This number includes 57 candidates who were also required to file as City employees.

Candidates for City Elective Office

In 2025, there were two special elections for City Council and a Citywide election. Pursuant to the City’s Annual Disclosure Law, all candidates were required to file an annual disclosure report with the Board covering calendar year 2024. Candidates seeking matching funds from the New York City Campaign Finance Board (“CFB”)

were required to file their reports by the deadlines found in [Board Rules § 4-05](#) to be eligible to receive payment of matching funds in February, March, or April. The AD Unit reviewed each of those reports for completeness and reported those findings to CFB; only candidates whose reports were accepted as complete were eligible to receive payment of matching funds from CFB.

| <u>2025 Special Elections</u> | |
|--------------------------------------|-------------------------------|
| City Council District 44 | 3 Candidates (3 filed) |
| City Council District 51 | 3 Candidates (3 filed) |

| <u>2025 Citywide Elections¹</u> | |
|---|-----------------------------------|
| Mayor | 17 Candidates (15 filed) |
| Comptroller | 6 Candidates (6 filed) |
| Public Advocate | 5 Candidates (5 filed) |
| Borough President | 16 Candidates (13 filed) |
| City Council | 171 Candidates (159 filed) |

¹ The numbers in this table include candidates who were also required to file as a City employee, including elected officials running for reelection.

Changes to Board Rules § 4-04 (Contract Filers)

In 2025, the Board held three open meetings and a public hearing to discuss its proposed amendments to [Board Rules § 4-04](#) (effective October 9, 2025). Board Rules § 4-04 defines one of the categories of required filers in the City’s Annual Disclosure Law commonly known as “contract filers.” The Board repealed and replaced Board Rules § 4-04 to limit the category of “contract filers” to public servants who have worked on the specific City matters outlined in the law and whose duties with respect to those matters was significant enough to warrant the filing of an annual disclosure report.

Enforcement of Penalties Against Late Filers

A required filer who files their report more than one week after their filing deadline is subject to a fine as a late filer in accordance with [Board Rules § 4-07](#). Pursuant to the rule, each late filer is sent a Late Filer Notice and given an opportunity to submit a written response for the Board’s consideration or pay a fine based on the fine schedule found in Board Rules § 4-07(c).

In 2025, the Board completed its prosecution of late filers from the prior year’s filing period. The Board issued 15 public orders imposing fines on late filers after considering their written responses; 13 public orders imposing fines on late filers who neither submitted a written response nor paid the fine; and one public order concerning 48 late filers who paid their fines in accordance with Board Rules § 4-07(c). These late

filers were from over 25 different City agencies and had fines that ranged from \$250 to \$2,000 for filing between 8 and 215 days after their filing deadlines. The Board also issued five confidential orders not imposing fines after considering the written responses submitted by those filers.

The Board began its prosecution of late filers from the 2025 filing period. In 2025, the Board considered written responses from 42 late filers from almost 20 different City agencies who filed between 8 and 74 days after their filing deadlines. The Board issued 12 confidential orders not imposing fines and 30 public orders imposing fines. The fines imposed by the Board ranged from \$250 to \$750.

Review of Reports

During 2025, the AD Unit reviewed almost all 2024 reports for completeness in accordance with the City's Annual Disclosure Law. The AD Unit compared the information reported to information about the filers from available sources, including press reports, waivers granted by the Board, and informal advice provided by the Board's Legal Advice Unit. The AD Unit identified information in over 1,100 filers' reports that may not have been accurately reported and contacted those filers about amending their 2024 reports. The AD Unit also reviewed reports for potential conflicts of interest and worked with the Board's Legal Advice Unit to advise filers about those potential conflicts.

Filers Leaving City Service

City employees who meet the filing criteria on the day they leave City service are required to file a final report within 60 days of their last day performing work for the City. In 2025, 289 public servants filed a final report covering the portion of 2024 that they worked for the City. Failure to file a required final report means that the filer will not receive their last paycheck and/or any lump sum payments to which they are entitled. To verify that a filer has completed this requirement, upon the request of the filer's agency, the AD Unit issues a Certification of Compliance.

By the Numbers:

| | <u>2022</u> | <u>2023</u> | <u>2024</u> | <u>2025</u> |
|--|-----------------|-----------------|-----------------|--------------------|
| Reports Reviewed¹ | 8,800 | 9,022 | 9,302 | 9,042 |
| Filers Advised of Potential Conflicts | 240 | 339 | 185 | 173 |
| Late Fines Collected² | \$24,500 | \$41,200 | \$19,700 | \$46,350.10 |
| Certifications of Compliance Issued for Filers Leaving City Service | 981 | 432 | 475 | 445 |
| AD Reports Released | 399 | 533 | 1,340 | 448 |

¹ The numbers in this row do not include final reports that were reviewed.

² The numbers in this row reflect the total amount of fine payments received by the Board during the year.