

Charter Reforms for Better New York City Government

**How the 2025 Charter Revision Commissions
can strengthen accountability, democracy, and
checks and balances in our city**





Introduction

The year 2025 presents a unique opportunity to strengthen and improve New York City's government. With two charter revision commissions underway, a citywide election on the horizon, and heightened public attention on city issues due to the controversies surrounding the current mayor, now is the time to consider meaningful reforms. The combination of these factors creates an environment ripe for discussions on governance, accountability, and civic engagement.

At its core, the New York City Charter is functioning well and does not require a radical restructuring of city government, its elected officials, or the distribution of power among them. The existing system has enabled New York City to navigate significant challenges over the past decades, from rebuilding after the devastation of 9/11 to responding to the unprecedented crisis of the COVID-19 pandemic.

However, recent years have highlighted several weaknesses and areas in need of improvement. First, ethics oversight and accountability must be strengthened in response to the low ethical standards exhibited by the current administration. Second, voter participation must be dramatically improved, as historically low turnout rates undermine the legitimacy of our democratic process. Third, the City's system of checks and balances must be reformed to foster greater collaboration between branches of government, ensuring that officeholders prioritize public interest over political self-interest.

The proposals that follow are not exhaustive—Citizens Union continues to work with lawmakers to advance reform in many areas—but serve as a starting point for discussion. They aim to build a more honest, accountable, collaborative, and inclusive city government—one that truly represents and serves the people of New York City. By taking these steps, we can strengthen democracy at the local level and create a government that works more effectively for all New Yorkers.

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Democracy and Elections

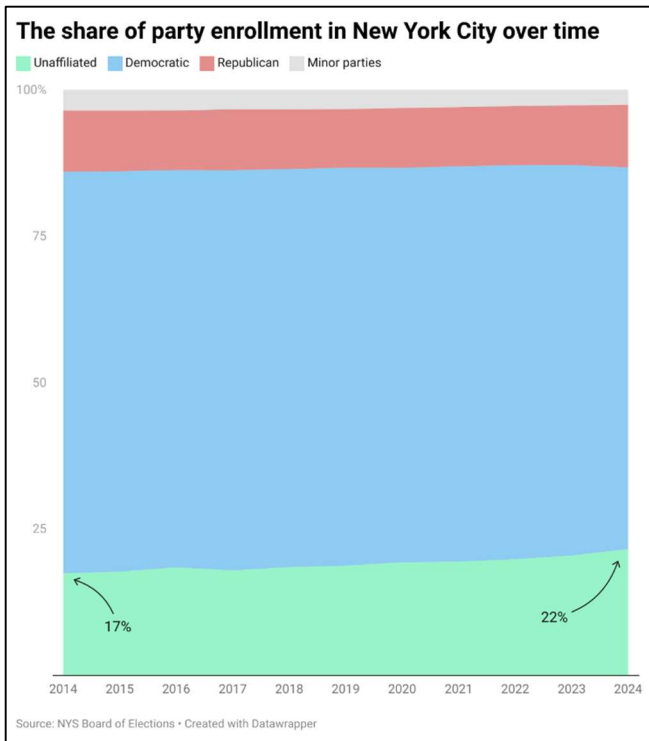
When the current City Charter was approved by voters in the 1989 mayoral general election, voter turnout was 60%. In the most recent mayoral election, only 23% of voters turned out to cast their ballot. Voter participation in New York City’s municipal elections has been dropping steadily for more than three decades, and there are no signs this trend will stop. New Yorkers enjoy a very robust civic society, but only a small minority of them end up deciding the identity of the officials who control the largest, wealthiest city in the United States. Low participation rates pose a real challenge to the democratic legitimacy of our local government in the long term, and reversing the trend requires transformational changes.

Implement A Top-Two Primary Election System

New York City is one of the few large cities that still uses a closed partisan primary system.¹ Because the winner of the Democratic primary—and in some areas, the Republican primary—is essentially guaranteed to be elected in the general election, and since relatively

few voters participate in the primary, only a very small share of the voting-age population ends up deciding who gets elected to office in New York City. For example, just 9% of the overall electorate voted for Eric Adams in the 2021 primary election; former Mayor Bill de Blasio was effectively voted to office by only 6% of the electorate in the 2013 primary.

The partisan primary system is particularly exclusive of the more than 1 million “independent” or “unaffiliated” voters, who are not enrolled in any political party and are locked out of any primary. The rate of unaffiliated voters has been steadily increasing and now accounts for nearly 22% of registered voters in New York City, over twice the number of Republican voters. Younger generations tend more to identify as independent, suggesting this trend would continue.² Research by Common Cause New York has shown that unaffiliated voters are engaged in politics and believe voting is their civic duty. Nearly 90% of them stated they are likely to vote in primaries if they could.³



¹ Among the 50 largest cities in the country, only 5 other cities have closed partisan primaries in their municipal elections: Philadelphia, Pennsylvania; Indianapolis, Indiana; Charlotte, North Carolina; Baltimore, Maryland; and Tucson, Arizona

² Stef Knight, Axios. January 15, 2023. *Younger voters declare independence.*

<https://www.axios.com/2023/01/15/voters-declare-independence-political-parties>

³ Sarah Goff, Common Cause New York. November 2023. *Independent State of Mind: The Rise of New York's Unaffiliated Voters.* <https://www.commoncause.org/new-york/wp-content/uploads/2023/11/Independent-State-of-Mind-The-Rise-of-New-Yorks-Unaffiliated-Voters.pdf>



New York City should open up its closed primary system by allowing all voters to vote in the primary. The best choice would be a top-two primary system. Candidates affiliated with all parties can run in this election, and the top two vote-getters then compete in the general election. We do not recommend a full nonpartisan primary, where voters are unaware of the partisan affiliation of candidates. Candidates should be able to note their party on the ballot, and party organizations should be able to endorse and support campaigns. A top-two system is used across Washington, California, Nebraska, and Louisiana, as well as several cities in Ohio. Alaska uses a top-four system.

A top-two open primary would complement New York City's ranked-choice voting (RCV) system. It would allow New Yorkers to enjoy RCV's benefits, like voting without the fear of "spoiler candidates," fewer negative campaigns, and greater diversity and variety of candidates. Instead of one winner, a ranked choice open primary would result in two finalists qualifying for the general election, where voters would face a clearer choice between two different campaigns in a higher-turnout election. Seattle, Washington will be using such a system starting in 2027. Many cities use Ranked Choice Voting in a general election without first holding a primary. However the election is structured, the objective should be to expand the number of voters who get a say in the election of City officials.

Research has shown that top-two primary systems make elections more competitive, reduce polarization and extremism, and encourage more voter outreach by campaigns. A key element is that when candidates from the same party face one another in the general election, as occasionally happens, they are forced to appeal to a broader electorate beyond their party's base.⁴

Voters last opined on this issue in 2003, when they rejected a proposal by a Charter Revision Commission to implement nonpartisan primaries. Voter turnout in that off-cycle election was around 15%, and entire generation has passed since. It is time to propose this option to voters again.

Move New York City Elections to Even-numbered Years

Despite significant efforts to improve our elections in recent years, turnout in municipal elections has continued to consistently decline with each cycle, regardless of the nature of the mayoral race. This problem is worsened by the uneven nature of turnout: the local electorate is wealthier, older, and whiter than the overall voting age population of New York City.⁵

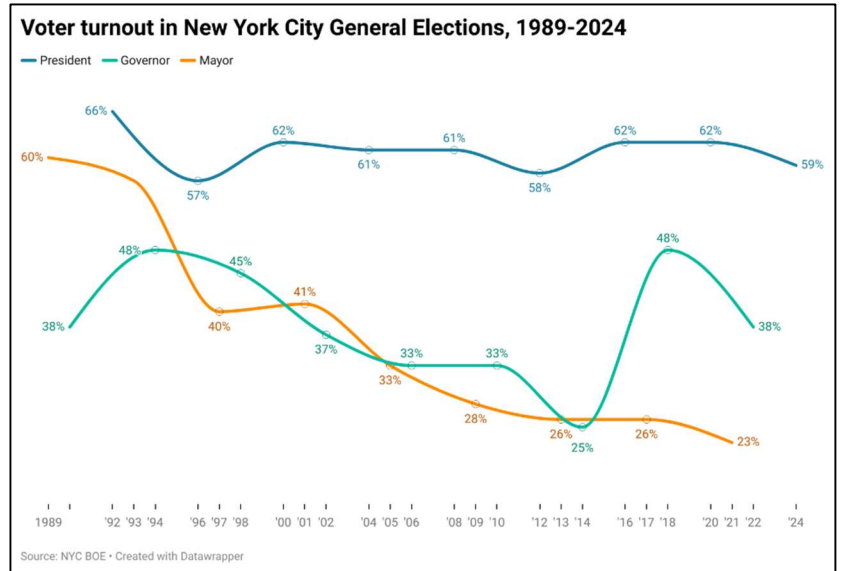
⁴ See for example: Sparks, Steven. 2019. "Campaign Spending and the Top-Two Primary: How Challengers Earn More Votes per Dollar in One-Party Contests." *Electoral Studies* 54: 56–65.; Grose, Christian R. 2020. "Reducing Legislative Polarization: Top-Two and Open Primaries Are Associated with More Moderate Legislators." *Journal of Political Institutions and Political Economy* 1(2): 267–287; Schnurr, Emily. 2019. *Competition and the Top-Two Primary in Washington State*. PhD dissertation, Northern Arizona University.

⁵ Citizens Union. December 2022. *Policy Report: Moving Municipal Elections to Even-Numbered Years*. https://citizensunion.org/wp-content/uploads/2023/01/Moving-Municipal-Elections-to-Even-Numbered-Years-Citizens-Union-report_FINAL.pdf



A key reason for low participation is that our off-cycle election calendar depresses voter turnout. During odd-year elections, less information is available, resources for voter engagement are lower, and the majority of voters stay home. In comparison, turnout in even-year presidential elections has remained steady for about three decades, hovering around 60%. For every New Yorker who votes for mayor, nearly three vote for president.

Aligning the timing of our municipal elections with high-profile, high-turnout federal or statewide elections would dramatically boost voter turnout for local offices, from mayor to council districts. It would also reduce the gaps in participation, particularly among young voters and voters of color.⁶ And it would save the City tens of millions of dollars a year, according to the Independent Budget Office.⁷ Importantly, the



measure is very popular with voters, and polls consistently see it receives widespread approval rates regardless of age, race and ethnicity, education, or party affiliation.⁸

Efforts are currently being made to remove the state constitution provision that requires city officers, including in New York City, to be elected on odd-numbered year. Chapter 741/2023, signed by Governor Hochul, had already done that at other levels of government, by moving county and town elections from odd to even years. A proposed constitutional amendment has been in negotiations in Albany, and in 2024, the State Senate passed a partial version of the reform.⁹

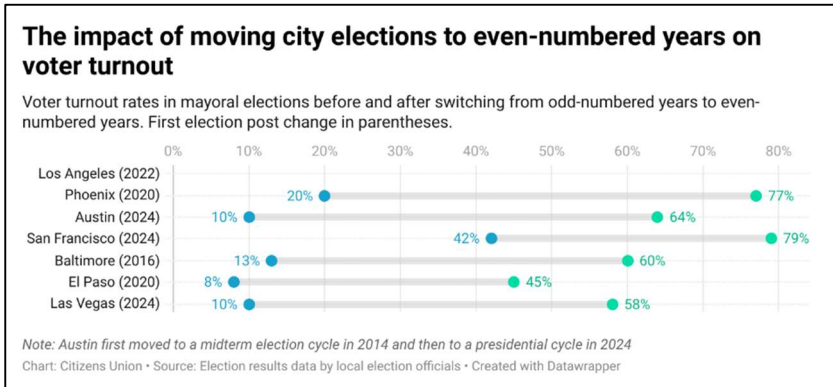
⁶ Election Law Clinic, Harvard Law School. December 3, 2024. *Testimony submitted to the New York City Council Committee on Governmental Operations, State & Federal Legislation*. <https://static1.squarespace.com/static/60a559b59cfc63389f67f892/t/674f8d5c29915c7b8d59c005/1733266780394/Letter+to+NYC+Council+re+NY+Election+Alignment+vF.pdf>; Hajnal, Z., Kogan, V., & Markarian, G. 2022. "Who Votes: City Election Timing and Voter Composition". *American Political Science Review*, 116(1), 374-383

⁷ City of New York Independent Budget Office. August 15, 2024. *Fiscal Impact of Shifting Local Elections to Even-Numbered Years*. <https://ibo.nyc.ny.us/iboreports/fiscal-impact-of-even-year-elections-august-2024.pdf>

⁸ *Manhattan Institute*, Jesse Arm. April 18, 2024. *Polling NYC Survey Analysis of 2025 Likely Mayoral Voters on Politics, Crime, Migrants, and Electoral Reform*. <https://manhattan.institute/article/polling-nyc-survey-analysis-of-2025-likely-mayoral-voters>; *Siena College Research Institute*, 28 June 2023. *NYers Oppose Using SUNY Dorms to Temporarily House New Migrants to New York, 54-33%*. <https://scri.siena.edu/wp-content/uploads/2023/06/SNY-June-2023-Poll-Release-FINAL.pdf>

⁹ S9126 (Skoufis)/A10466 (Walker), 2024; Bill Mahoney, *Politico NY*. May 2, 2024. *Moving New York City elections to even years enters end-of-session talks*. <https://subscriber.politicopro.com/article/2024/05/new-york-elections-even-years-00155743>

Citizens Union urges the Charter Revision Commission to support the efforts to move the City’s elections to even-numbered years. Should the State Constitution’s odd-year election requirement be changed, the City Charter might need to be changed in several locations. The Commission should consider addressing that factor in its deliberations. Citizens Union is willing to propose specific recommendations on the best path forward.



Maintain Ranked Choice Voting

Citizens Union reaffirms its support for the use of Ranked Choice Voting in the municipal primaries. This system has been successfully implemented in the 2021 citywide election, the 2023 City Council election, and several special elections in recent years. It has proven useful in promoting a more competitive, open, and fair election landscape. Ranked Choice Voting has encouraged more people from more diverse backgrounds to run for office. Under that system, voters elected the most diverse City Council in history, and the first ever majority-women Council.

An in-depth analysis of voter behavior by the Center for Urban Research at the CUNY Graduate Center found that voters understood the process and substantially more of them voted in the June 2021 Democratic Primary than in previous mayoral primary elections, including the open seat in 2013.¹⁰ As voters and campaigns adapt to the new system, we expect to see more benefits, like campaign cross endorsements and nuanced ranking by voters.

¹⁰ Center for Urban Research, The Graduate Center, City University of New York. July 4, 2022. *The Impact of Ranked Choice Voting on the Democratic Primary Elections of 2021*. <https://www.gc.cuny.edu/sites/default/files/2022-07/CUR-Report-on-RCV-Final.pdf>



Checks and Balances

Recent years have been marked by a tense relationship between the legislative and executive branches, with frequent clashes over policy, appointments, and jurisdiction. While disagreements between the mayor and the City Council are not new, these moments provide an opportunity to assess whether the New York City Charter could be improved to foster collaboration rather than incentivize political self-interest. The following recommendations do not encompass all possible amendments related to checks and balances but propose significant changes.

Establish a Mechanism for Mayoral Removal Due to Misconduct

Recent events and public debate over the removal of the Mayor have revealed a major flaw in current laws governing mayoral misconduct. Currently, the governor holds absolute power to remove the mayor under Public Officers Law §33(2), which only requires that the mayor receive a copy of the charges and “an opportunity to be heard in his defense”. At the same time, the New York City Charter lacks a practical mechanism for removing a mayor under exceptional circumstances related to misconduct.


Section 10 of the Charter outlines the composition, powers, and procedures of the Committee on Mayoral Inability, and a possible subsequent removal by the City Council. However, the structure of this provision, which requires near-unanimous agreement among Committee members, including mayoral appointees, and allows multiple opportunities for the mayor to challenge removal, suggests it is primarily designed for cases of physical, mental, or medical incapacity rather than misconduct-reflecting the 25th Amendment to the U.S. Constitution.¹¹

To address this gap, the City Charter should establish a clear and balanced process for mayoral removal due to misconduct. Citizens Union is actively developing a proposal to present in the near future.

Several challenges must be considered in crafting such a process. First, removal over misconduct is typically done through the impeachment process. Most legislative bodies overseeing removal proceedings, including the U.S. Congress and the New York State Legislature, operate within a bicameral system, where one chamber presents charges and the other conducts the trial.¹² In contrast, New York City has a unicameral legislature, the City Council, which often finds itself at odds with the mayor. In addition, impeachment typically requires a supermajority vote to convict and remove from office, a high threshold

¹¹ Further reading: Richard Briffault, Vital City. October 10, 20204. *To Remove a Mayor: Both Too Easy and Too Hard*. <https://www.vitalcitynyc.org/articles/if-eric-adams-does-not-resign-can-he-be-forced-out-of-office-its-complicated>

¹² In Nebraska, the only unicameral state, the Nebraska Supreme Court conducts the trial. Oregon does not have an impeachment clause. All other states operate based on some form of the bicameral impeachment process.



meant to reserve such unusual action to serious abuses of power, but a two-thirds vote to override a mayoral veto is not uncommon in city councils. Even a higher threshold for removal could be influenced by partisanship, considering that Democrats have always held more than 85% of Council seats, including during Republican mayors.

There are other elected offices in city government, and they could play a role in a two-step impeachment process. However, political dynamics within New York City, where borough-wide and citywide officials often have ambitions for higher office, including the mayor's office, may introduce conflicts of interest. Any removal mechanism should minimize personal political motivations.

An alternative method to hold elected officials accountable for misconduct is a recall election. Of the 15 largest cities in the country, 11 have recall provisions, typically initiated by citizen petitions (some are initiated by the local city council)¹³. However, recall elections have a mixed track record, and they are too often influenced by special interests and substantial outside spending. Additionally, New York City likely cannot adopt a recall system without explicit state authorization.¹⁴

Despite these challenges, we continue to believe that a some locally controlled process for mayoral removal due to misconduct is essential to ensuring accountability and public trust. Such a mechanism would reduce reliance on the governor's unilateral authority. Citizens Union remains committed to presenting a detailed proposal addressing these concerns.

Establish Minimum Timeframes for Future Charter Revision Commissions and Local Laws Sent to A Referendum

The process of amending the City Charter through a referendum should be open, deliberative, and provide sufficient time for meaningful public input. Recent experiences highlight the need for procedural safeguards to prevent rushed or politically motivated revisions.

The 2024 Charter Revision Commission operated on an extremely condensed timeline, making it the shortest commission since 2002. Similarly, the City Council approved a local law sending a ballot question to a referendum without adequate time for public engagement. Citizens Union criticized both efforts as inadequate.¹⁵

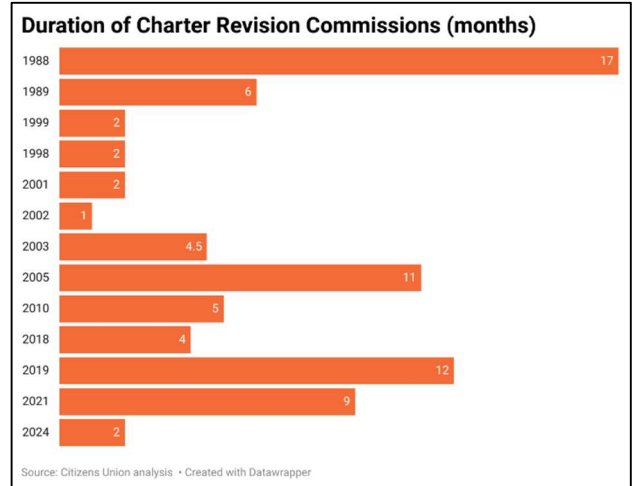
¹³ Dylan Sharkey, Illinois Policy. April 23, 2024. *Chicago among 4 of 15 largest cities unable to recall mayor*. <https://www.illinoispolicy.org/chicago-among-4-of-15-largest-cities-unable-to-recall-mayor/>

¹⁴ See Office of the New York State Comptroller, Legal Opinion 89-31. <https://www.osc.ny.gov/legal-opinions/opinion-89-31>

¹⁵ Citizens Union. June 17, 2024. *Testimony before the 2024 City Charter Revision Commission - Government and Election Reform Forum & Hearing* <https://citizensunion.org/portfolio-item/testimony-before-the-2024-charter-revision-commission-government-and-election-reform-hearing/>; Citizens Union. May 29, 2024. *Testimony before the City Council Committee on Governmental Operations, State & Federal Legislation on Introduction 908-2024*. <https://citizensunion.org/wp-content/uploads/2024/05/CU-Testimony-Intro-0908-2024-Expanding-Council-Advice-and-Consent-.pdf>



To ensure a more deliberate process, reforms should prevent either the executive or legislative branches from accelerating charter revisions in ways that limit public participation and undermine our City’s charter. The charter revision process is governed by the state’s Municipal Home Rule Law, and Citizens Union supports proposed legislation that would establish minimum timeframes for charter revision commissions and remove the mayor’s ability to bump referenda questions off the ballot.¹⁶



However, New York City has the authority to set its own procedural rules on charter revision, provided they do not conflict with state law. We reaffirm our recommendations made before the 2024 Charter Revision Commission for appropriate charter revisions:

- Require at least 180 days between a charter revision commission's first meeting and the filing of ballot proposals with the City Clerk, and at least 30 days between a commission’s final report and the date of filing ballot proposals with the City Clerk.
- Require that any local law amending the Charter in a manner that requires a referendum would be voted on twice by the City Council, with 30 days between each vote, and a public hearing held in committee before every vote. This reflects the approach of the New York State Constitution, which requires amendments to pass twice before being placed on the ballot. This timeline is shorter than that for charter commissions because local laws are narrower in scope and such cases remain rare.

Make The Police Commissioner Subject to Advice and Consent

In matters of policing, as in other areas, the City Council’s role is to enact laws, approve budgets, and conduct oversight through committee hearings. The Council currently has no role in the appointment of the Police Commissioner, or for that matter, in most other agency heads, except for the Commissioner of Investigation and the Corporation Counsel.

Because of the significant influence of the Police Commissioner on public safety and the impact of the NYPD on the daily lives of the City’s residents, Citizens Union had previously recommended that the appointment of the Police Commissioner be made subject to the

¹⁶ S590 (Krueger)/A3665 (Simone), An act to amend the municipal home rule law, in relation to the city charter referendum process.



advice and consent of the Council,¹⁷ and we reiterate that position here. This would ensure a level of accountability and public scrutiny in the selection process of this central public official.

We do so on the assumption that the Council, in evaluating the qualifications of nominees for Police Commissioner, as it has for nominees for other positions, will do so in a responsible manner and without the introduction of extraneous political considerations.

We are singling out the Police Commissioner but do not support broadening the use of advice and consent to all agency heads, which might unduly interfere with the mayor's control over executive agencies. Council approval of the Corporation Counsel and Commissioner of Investigation are supported by the particular circumstances of each office. Any changes to advice and consent requirements should similarly be considered on a case-by-case basis, with reasoned and thoughtful debate. Past expansions of this authority have been gradual and targeted, and any future expansions should follow the same approach.¹⁸

Ethics, Accountability, and Integrity

There is perhaps no issue more pressing in the minds of New Yorkers than corruption in city government. A series of investigations, indictments, and ethical scandals in and around City Hall have raised serious concerns about the ability to hold corruption in check. However, it is important to acknowledge that many of these controversies have come to light because the system has, in some respects, functioned as intended: the Campaign Finance Board has flagged attempts to defraud the campaign finance system, the Department of Investigation and law enforcement agencies have pursued leads, and multiple indictments for corruption have been issued.

Nonetheless, gaps remain in the City Charter where misconduct has been reported but no investigation has materialized due to legal loopholes. This moment provides an opportunity to strengthen the ethical watchdogs that serve as a bulwark against the abuse of power. The following recommendations aim to enhance accountability and integrity in city government.

Make the Budget of the Conflicts of Interest Board Independent and Increase Its Size

The budget of the Conflicts of Interest Board (COIB) is determined through negotiations between the mayor and the City Council as part of the annual budget process. In recent years, COIB's budget has fluctuated and its headcount reduced. The Board has not received authorization from the Office of Management and Budget (OMB) to fill vacant positions due to the Program to Eliminate the Gap (PEG) initiative, resulting in a 16% reduction in staff. As

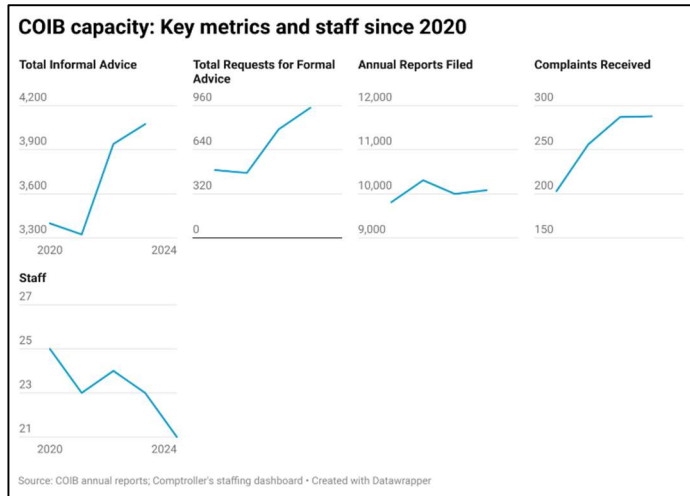
¹⁷ Citizens Union. March 2021. *Agenda for Police Reform – 2021 Issue Brief and Position* <https://citizensunion.org/wp-content/uploads/2021/03/citizens-union-agenda-for-police-reform-part-1-governance-and-accountability-mar-2021.pdf>

¹⁸ Citizens Union. May 29, 2024. *Testimony before the City Council Committee on Governmental Operations, State & Federal Legislation on Introduction 908-2024*. <https://citizensunion.org/wp-content/uploads/2024/05/CU-Testimony-Intro-0908-2024-Expanding-Council-Advice-and-Consent.pdf>



a result of COIB’s small size, budget cuts impact on the Board particularly hard. The number of complaints and requests for advice has increased in the same time period.

Despite having been granted additional responsibilities—such as oversight of legal defense



trusts and affiliated not-for-profits—the COIB’s resources have not kept pace with the expanding scope of city government.

COIB’s budget is determined by the very individuals subject to its scrutiny. To ensure COIB’s independence and allow it to properly oversee the city’s ethics regime, its budget should be independent. Other oversight bodies have been given independent or protected budgets, including the Campaign Finance Board and the Civilian Complaint Review Board. And previous Charter commissions have stressed COIB’s need for independence, including shifting appointment power away from total mayoral control. Possible

solutions include pegging COIB’s budget to a percentage of the Law Department’s budget or a fixed share of the overall city budget.¹⁹

Crucially, the COIB budget should be substantially increased to enhance the Board’s current staffing and technological capacities, but also to fulfill the new powers and authorities recommended below.

Empower COIB to Interpret & Enforce Ethics Provisions Beyond Chapter 68

Currently, COIB’s authority is limited to interpreting and enforcing Chapter 68 of the City Charter, along with specific related laws on affiliated nonprofits, lobbying gifts, legal defense funds, and annual disclosures. However, other ethics-related provisions exist outside of Chapter 68, such as Section 1 136.1, which governs the misuse of government funds and resources.

Subject to the proposed budget increase above, COIB should be empowered to interpret and enforce specific ethics-related provisions that serve similar purposes to Chapter 68 but have been codified outside of it. This would allow for streamlined compliance, reduce regulatory confusion, and improve enforcement coordination with the Department of Investigation (DOI).

¹⁹ See for example: Citizens Union, 2010. *City Charter Revision Recommendations: Increasing Avenues for Participation in Governing and Elections in New York City*. https://citizensunion.org/wp-content/uploads/2010/06/0610CU_Charter_Revision_ReportRecommendations.pdf; 2009 Conflicts of Interest Board proposed revisions to the City Charter, found at <https://www.nyc.gov/site/colib/the-law/past-charter-revisions-and-proposed-amendments.page>



Transfer Lobbying Oversight from the City Clerk’s Office to COIB

Concerns have long been raised about the City Clerk’s role in lobbying oversight and enforcement, as the office is housed within, and appointed by, the City Council—the very entity in which lobbying occurs. This arrangement creates an inherent conflict of interest.

The City Clerk’s Lobbying Bureau, a small five-person unit, primarily focuses on compliance rather than enforcement. Its enforcement actions are limited to administering late fees, conducting 45 audits per year, and issuing minimal civil penalties—totaling just \$10,000 since 2018. Few violations, if any, are referred to DOI.²⁰

Lobbying oversight should be transferred to COIB, which should receive dedicated funding and staffing for this responsibility, or a future ethics agency that would encompass similar responsibilities. COIB already oversees lobbyists under the Lobbying Gifts Law and manages disclosure reporting for over 10,000 individuals. Given its expertise in ethics regulation, consolidating lobbying oversight under COIB would create a more effective system. A joint ethics-lobbying body would be analogous to COELIG on the state level, and entities with similar authority in cities like Los Angeles and San Francisco.

Allow COIB to Correct Public Mischaracterizations of Ethics Guidance


COIB provides confidential advice to public servants who seek guidance on issues related to the city’s ethics laws through informal advice, staff letters, and formal advisory board letters. Confidentiality of advice encourages public servants to seek guidance and assists with ethics compliance, but it can also be misused. In particular, senior city officials scrutinized by the public or media for questionable conduct can argue they were given COIB approval or mischaracterize the guidance given. Under current rules, COIB cannot correct these misstatements or even acknowledge it gave advice.

To address this, there should be some provision in the Charter that would allow the public to know if high-ranking public officials misrepresented the guidance they received from COIB.

One possible approach exists at the state level. New York Executive Law §94(7)(b) allows the Commission on Ethics and Lobbying in Government (COELIG) to correct misstatements about ethics guidance. COELIG recently affirmed this in Advisory Opinion No. 25-01, which stated confidentiality may be deemed waived by the misleading, inaccurate, or incomplete public disclosure of the nature or substance of guidance by the recipient, and detailed what information may be released.²¹ Other policy solutions should also be considered.

²⁰ Office of the New York City Clerk, *Lobbying Bureau Annual Reports; Testimony by the New York City Clerk before the Committee on Governmental Operations, State & Federal Legislation*. April 19, 2024.

²¹ New York State Commission on Ethics and Lobbying in Government. *Advisory Opinion No. 25-01*. <https://ethics.ny.gov/advisory-opinion-no-25-01-0>



Additionally, the Charter should clarify that officials are free to disclose the ethics advice they receive. While this is already the case, some officials have falsely claimed that they are prohibited from doing so to avoid responding to public scrutiny on apparent misconduct. Amending Chapter 68 to explicitly state it does not preclude the recipient of advice from disclosing the advice publicly would remove this excuse.

Forbid Public Servants to Work on Matters Relating to Former Interest

The City Charter requires incoming public servants to sever ties with businesses and organizations that have dealings with the city.²² However, it does not address potential conflicts arising from past relationships with former employers, clients, or business partners. Even after formally severing ties, officials may retain influence and connections that create conflicts of interest or perceived conflicts. Some top officials return to their old firms after completing time in office.

Recent cases have highlighted this issue. For example, when Frank Carone, a prominent attorney, was appointed as Mayor Eric Adams' Chief of Staff, he left his law firm but retained relationships with former clients. With no ongoing interests to be regulated by COIB, Carone was free to develop his own recusal policy related to former clients.²³

After leaving the administration, he started a consulting firm that represents clients with business before the city while also managing the mayor's reelection campaign.²⁴ Recently, an investigation found that a City Hall chief of staff was lobbied by a company where he formally serves as vice president on a large development deal.²⁵

Section 2604 of the City Charter should be amended to prohibit officials from engaging in particular matters related to their former interests for a defined cooling-off period. This prohibition could be modeled on existing restrictions in §2604(b)(1) (prohibited interest in firms engaged in business dealings with the city) or §2604(d)(4) (post-employment restrictions).


Establishing such cooling-off period would set clear boundaries and help create a more trusting climate inside City Hall and within agencies. The federal government has long

²² Charter §2604(a)

²³ Sally Goldenberg and Joe Anuta, Politico NY, May 17, 2022. *Adams' top aide navigates uncharted path on New York ethics issues* <https://www.politico.com/news/2022/05/17/eric-adams-frank-carone-city-hall-00032798>

²⁴ David Freedlander, New York Magazine, March 19, 2024. *The Eric Adams Smash-and-Grab*. <https://nymag.com/intelligencer/article/frank-carone-eric-adams-mayor-new-york.html>

²⁵ Chris Glorioso, NBC New York, January 16, 2025. *Conflicted? City Hall chief of staff lobbied by his former employer on lucrative lab deal*. <https://www.nbcnewyork.com/investigations/i-team-mayor-adams-wants-to-turn-a-historic-city-property-over-to-a-private-developer/6109941/>; Chris Sommerfeldt, New York Daily News, February 6, 2025. *Mayor Adams aide under NYC Council probe didn't recuse from ex-employer dealings due to 'miscommunication'* <https://www.nydailynews.com/2025/02/06/mayor-adams-aide-under-nyc-council-probe-didnt-recuse-from-ex-employer-dealings-due-to-miscommunication/>



imposed similar recusal rules, with Presidents Obama, Trump, and Biden all issuing executive orders requiring a two-year recusal period for appointees regarding particular matters directly and substantially related to a former employer or former clients, including regulations and contracts. Waivers can be given in certain cases.²⁶

Merge The Three Police Oversight Bodies into One Police Oversight Board

A significant challenge in managing police accountability in New York City is the fragmented system of oversight. By one count, a dozen offices and agencies both inside and outside the NYPD oversee police actions, yet a lack of coordination and limited access to NYPD information undermines their effectiveness²⁷. A more effective system should be utilized.

The three external oversight agencies - the Inspector General for the Police Department (OIG-NYPD), the Mayor's Commission to Combat Police Corruption (CCPC), and the Civilian Complaint Review Board (CCRB) – should be consolidated into one unified Police Oversight Board. Combining these agencies would strengthen their collective capacity and allow for easy access to NYPD information.

The OIG-NYPD and the CCPC perform similar and somewhat overlapping functions. The CCRB serves a somewhat different purpose, but its ability to investigate complaints, obtain relevant information, and prosecute wrongdoing could be strengthened as part of a larger and more comprehensive police oversight agency.

The agency consolidation proposal was included in the 2021 NYC Police Reform and Reinvention Collaborative Plan²⁸ and was endorsed by then-Mayor de Blasio. The Department of Investigation recommended that idea in its December 2020 report into NYPD Response to George Floyd Protests²⁹. However, the proposal was not included in the 2021 Council Resolution implementing the reform plan. Given ongoing concerns about police accountability, this recommendation should be revisited.

²⁶ See for example: Executive Order 13490, President Barack Obama; Executive Order 13770, President Donald Trump; Executive Order 13989, President Joe Biden.

²⁷ James Yates, September 19, 2024. *Report to the Court on Police Misconduct and Discipline*. <https://www.nypdmonitor.org/wp-content/uploads/2024/09/Discipline-Report.pdf>

²⁸ The New York City Police Reform and Reinvention Collaborative Plan, found at: <https://www.nyc.gov/site/policereform/reform-plan/reform-plan.page>

²⁹ New York City Department of Investigations, December 2020. *Investigation into NYPD Response to George Floyd Protests*. <https://www.nyc.gov/assets/doi/reports/pdf/2020/DOIRpt.NYPD%20Reponse.%20GeorgeFloyd%20Protests.12.18.2020.pdf>