



CITIZENS UNION OF THE CITY OF NEW YORK

Testimony Before the New York State Commission on Ethics and Lobbying in Government, Annual Public Hearing September 25, 2025

Good afternoon, members of the Commission on Ethics and Lobbying in Government. My name is Ben Weinberg, and I am the Director of Public Policy at Citizens Union. We are a good government group working to reform New York City and state governments. Thank you for inviting us to speak at COELIG's annual public hearing.

Before beginning my remarks, I want to take a moment to note the passing of COELIG commissioner Michael Cardozo. Michael was a truly devoted public servant who always kept the public's interest at heart. Among his many roles prior to his appointment to COELIG, he was long-time Board member of Citizens Union, and was always generous with his time, advice, and counsel. I mourn his loss and recognize the deep mark he left on New York's civic and legal life.

Turning to today's hearing: I want to begin by acknowledging the sheer amount of work that went into producing the comprehensive review document before us. The framing questions and the thoughtful presentation of potential solutions reflect a seriousness of purpose. A periodic review process like this - open to the public and structured to assess weaknesses and explore remedies - should be replicated in many other areas of New York State government.

Because of the quality of this work, the caliber of this Commission, and the backing it enjoys from state leadership, you have a rare opportunity: the opportunity not only to study these issues but also to be truly heard. Besides the policy discussion, our main message to you here is to seize that rare opportunity by recommending even those proposals you think may not be immediately feasible under current political circumstances, if you believe they are worthy and important. Your endorsement of proposals, even those ambitious, helps set the stage for progress in the near and long-term future.

Today, I will only touch briefly on a few issues, and will follow up with a fuller written submission.

Lobbying and Campaign Contributions

The Commission was wise to identify the nexus between lobbying and campaign contributions in section 4 of your report as an issue worth exploring. If the goal is to strengthen public transparency around who is trying to influence government actions and how, then we cannot ignore the central role campaign contributions play in these efforts.

There are several ways to address this:

Donation Limits

The Commission asks whether to prohibit or restrict campaign donations from lobbyists and clients. A full prohibition on donations from lobbyists and clients may be difficult to sustain legally. But New York City's model, which imposes lower contribution limits for registered lobbyists, is an effective one.

Lower limits reduce both the perception and the reality that access can be purchased. In jurisdictions where they are implemented, lobbyists continue to work effectively but the electoral system turns cleaner.

Of course, to ensure important government decisions are not unduly influenced by campaign donations, similar donation limits should apply not only to registered lobbyists but also to those doing business with the state or seeking state contracts. This is the model in New York City, and proposals for that effect have been introduced in the state in past years. However, we acknowledge that this might not be within the area of focus of this Commission.

Limits are best applied broadly – to all registered lobbyists - rather than narrowly tied to whether a lobbyist has specifically targeted an official or plans to do so, as the Commission considers in the report. That is because lobbying priorities and targets shift all the time. In addition, if the boundaries for applying a regulation such as this are too narrow, they risk being easily circumvented. A clear blanket rule that applies to all lobbyists has an added benefit. It removes the expectation from all parties that campaign money should change hands, thus allowing the act lobbying to remain what it is supposed to be: informing, persuading, and petitioning—not trading.

Fundraising Limits

Often the greater concern is not direct donations but the fundraising that lobbyists undertake on behalf of candidates. This is especially true for large lobbying firms and can take the form of organizing fundraisers or directly collecting funds. We recommend clarifying that any limitation or disclosure requirements on lobbyists' donations apply to fundraising activities as well. The conflict of interest is too direct, and the leverage it creates is far greater than any individual contribution.

Disclosure of Donations or Campaign Services

The commission also asked whether further disclosures in this area are warranted. We believe so. We reiterate our recommendation that lobbyists be required to disclose their fundraising or campaign consulting activities in their lobbying reports. This should cover services for campaigns for state offices but also the services for state public servants who themselves are running for another office, even if not the legislature or statewide office.

New York City already requires such reporting, and even though compliance and enforcement there remain inconsistent, these disclosure rules allow the public, the media, and civic watchdog like ours to shine light on lobbying activities that began or developed around campaign services and fundraising. Lobbying firms often leverage the bonds made when serving campaigns to advance their clients and the business they seek before government.

Cooling-off Period for Campaign Consultants-Turned Lobbyists

Finally, the Commission should consider recommending a cooling-off period on lobbying an elected official whose campaign one worked on. Some lobbying firms offer both campaign and lobbying services. This means lobbyists can provide political consulting services or manage a campaign and then immediately lobby the candidate who just assumed office on behalf of clients, turning political relationships into financial gain. Millions are spent on such dual-purpose firms.

As an example, a [bill before the New York City Council](#) proposes prohibiting certain persons and organizations who provided paid political advice for candidates or solicited contributions for candidates from lobbying those candidates for one year after they were elected to city office. Other jurisdictions have addressed this issue too. San Francisco forbids campaign consultants and their companies to lobby elected officials who are current clients or were clients in the five years prior, with some exceptions. Some states, like Alaska and Maryland, approach this conflict through campaign restrictions, by prohibiting lobbyists from serving as campaign managers or treasurers.

Lastly, Citizens Union reiterates its support for:

- Explicitly codify sexual harassment as conduct that violates the code of ethics.
- Requiring electronic filing of financial disclosure statements and lobbying reports.
- Requiring that lobbying filings clarify whether lobbyists support, oppose, or take some other position on bills.

For more information, please contact Ben Weinberg, Director of Public Policy, at bweinberg@citizensunion.org