



For Immediate Release

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Citizens Union’s Statement in Response to DOI Report on the Conflicts of Interest Board’s Advisory Opinions

The Department of Investigation’s latest report includes important findings on the Conflicts of Interest Board and its approach to issuing ethics guidance

DOI argues that the Board has taken an overly expansive position that its advisory opinions are completely confidential

New York, N.Y. (December 18, 2025) – Grace Rauh, Executive Director of Citizens Union, a nonpartisan good government organization dedicated to promoting transparency and accountability in New York City, today released the following statement in response to the New York City Department of Investigation’s report on the Conflicts of Interest Board’s Advisory Opinion and Moonlighting Waiver Practices:

“Citizens Union has previously [raised concerns](#) of the risks created when ethics guidance is effectively shielded from public view under any circumstance, including when senior city officials scrutinized by the public or media refer to the guidance they received from COIB without disclosing it. Mayor Adams [leveraged this expansive](#) confidentiality when he reversed a de Blasio-era policy encouraging the disclosure of ethics guidance provided by COIB to commissioners. Unlike COIB, the State’s ethics agency (COELIG) recently affirmed that it may waive confidentiality if recipients make incomplete public disclosure of the guidance they received.”

“DOI rightly concludes that COIB should bring its practices into alignment with the City Charter by making advisory opinions public, either by publishing them with appropriate redactions where necessary or by issuing anonymized summaries that explain the Board’s legal reasoning without revealing confidential details. The incoming Mayor and the New York City Council should also make whatever legal changes are necessary to ensure top officials do not hide behind secret ethics memos.”

“Doing so would reduce the risk that advisory opinions are mischaracterized, promote clearer and more consistent compliance with the Conflicts of Interest Law, limit regulatory confusion, and improve coordination and enforcement across City oversight agencies. Most importantly, it would help restore

public confidence that New York City's ethics system operates transparently and fairly, especially for the City's most senior officials."

"We believe COIB should promptly follow the recommendations laid out in DOI's report, including a review of its approach to moonlighting. Citizens Union is concerned about the potential conflicts of interest when a full-time city employee is allowed to represent an entity with business before the city. Such a practice should not be permitted."

**We note that Randy Mastro is mentioned in the DOI report. Mastro is a former Chair of Citizens Union.*

About Citizens Union For more than a century, Citizens Union has been leading the fight for reform in New York. We are a non-partisan good government group that serves as a civic watchdog to combat corruption. We are New Yorkers from diverse backgrounds and political beliefs, united in our commitment to put the public interest ahead of all special interests. We work to ensure honest and accountable government, fair and open elections, and a civically engaged public. Principled and pragmatic, Citizens Union is an independent force for constructive reform, driving policy solutions to achieve responsible and responsive government in the City and State of New York. Learn more at www.citizensunion.org.

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