MINUTES OF THE PUBLIC SESSION
OF THE MARCH 19, 2025
MEETING OF THE COMMISSION ON ETHICS
AND LOBBYING IN GOVERNMENT

540 BROADWAY
ALBANY, NEW YORK 12207

25 BEAVER STREET, 5TH FLOOR
NEW YORK, NEW YORK 10004

Chair:	Leonard B. Austin (NYC)
Vice-Chair:	Ava Ayers (WebEx)
Members:	Dolly Caraballo (NYC) James W. Caras (NYC) Michael A. Cardozo (Absent) Claudia L. Edwards (NYC) Nancy G. Groenwegen (NYC) Seymour W. James, Jr. (NYC)
Staff:	Sanford N. Berland, Executive Director (NYC) Keith C. St. John, General Counsel (NYC) Kavita K. Bhatt, Deputy General Counsel (NYC) Carol Quinn, Director of Lobbying (NYC) Emily DeSantis, Director of Communications, Public Information Officer and Director of Public Affairs (ALB) Brian Weinberg, Director of Investigations and Enforcement (NYC) Michael Antolini, Deputy Director of Investigations & Enforcement (NYC) Erin Lynch, Deputy Director of Ethics (ALB) Megan Mutolo, Deputy Director of Lobbying (ALB) Andrea Robbins, Assistant Director of FDS (WebEx) Gareth Perrin, Deputy Director of Compliance Audit and Review (WebEx) Jennifer Bliss, Senior Investigative Counsel (ALB) Meagan Fleming, Associate Counsel (ALB) Theresa Wells, Associate Counsel (ALB) Alaina Infantino, Senior Investigator (NYC) Lori Donadio, Principal Investigative Analyst (WebEx) Martha Rivera, Executive Assistant (NYC) Gaetana Baldwin, Administrative Assistant (ALB)

CALL TO ORDER

Chair Austin called the March 19, 2025 meeting to order. Executive Director Sanford Berland announced the meeting was being held pursuant to and in accordance with the provisions of § 94 of the Executive Law and Article 7 of the Public Officers Law, that the conference room at the Commission's Albany office at 540 Broadway and the meeting room being used at the New York State Conference Center at 25 Beaver Street in New York City are open to the public during public session, and the public session is live-streamed, with the link available on the Commission's website. Executive Director Berland confirmed there was a quorum of members present at the New York City meeting site and stated Vice-Chair Ayers would participate remotely pursuant to POL §103-a and the rules and resolutions governing remote participation.

APPROVAL OF MINUTES – PUBLIC SESSION

February 19, 2025

Chair Austin asked if there were corrections to the minutes. Commissioner Groenwegen referred to page 5, line 7, noting the phrasing should be "…and as has been said before…". Additionally, she noted that the second to last sentence in the first paragraph of page 6, which reads, "…procurements that will consume additional nonpersonal services costs…" should be changed to "consume funds."

Commissioner Edwards moved, seconded by Commissioner James, to approve the minutes as modified. The motion to approve the minutes as amended carried unanimously.

REPORT FROM STAFF

Operations Update

Executive Director Berland called the Commission's attention to the Operations Update under Tab B of the agenda book, noting that in addition to the statistics for the most recently completed month, February 2025, and for the year to date, it includes comparisons to the previous month, January 2025, and to the corresponding periods in 2024.

Turning the Commission's attention to the report's first page, Executive Director Berland noted that the Investigations Division had received 21 tips, complaints, and referrals in February. A total of 8 matters were closed, all of which were COELIG matters. Four new investigations were opened. There are currently 181 pending matters and 55 open investigations.

Turning to the second page of the report, Executive Director Berland noted that the Advice and Guidance Unit had received 60% more requests for guidance this year, compared with the year-to-date total for 2024, and 70% more than in February 2024, and that post-employment and outside activity requests make up the bulk of the requests received. He added that staff's thinking continues to be that increased ethics training and a consequent heightened awareness of ethics requirements is driving the increase in guidance requests.

Commissioner Edwards asked how the cited statistics are comparable to the percentage of individuals who took ethics training before ECRA, noting that the pool of individuals the agency reaches has increased and could be connected to the increase in requests for guidance. Executive Director Berland said it would be possible to do a historical study to assess whether the predominant inquirers in prior years were policymakers or threshold filers. He noted that outside activity approval requests are consistently the largest single category of inquiries mandated under the regulations, and the population that falls under the outside activity regulations has not changed. He added that although there was a tenfold increase in the population COELIG is reaching, there is not a corresponding tenfold increase in inquiries. He noted the frequency of training for this population has gone from every three years to every year, which could be having an impact, but understanding the impact of that change would require some analysis.

Commissioner Edwards clarified that she was not suggesting conducting an in-depth study, but when a significant increase is cited, she wants to be clear that it has not been determined whether the increase was due to improvements or due to the increased population the agency is now mandated to train. Executive Director Berland understood Commissioner Edwards' viewpoint and noted that the staffing plan included an increase in staff in the Advice and Guidance Unit in contemplation of increased inquiries resulting from the expanded training requirement.

Commissioner Caras asked whether there is a way to review how quickly guidance questions are answered. General Counsel Keith St. John stated that the attorneys in the Guidance Unit's Attorney of the Day rotation try to turn the guidance requests around in about four days. Commissioner Caras asked how the attorneys handle time-sensitive requests. General Counsel St. John replied that those are often answered by telephone advice and may not require an informal letter opinion. Deputy General Counsel Kavita Bhatt added that most requests go through each agency's ethics officers first, so if there is a time-sensitive matter, the ethics officer will often reach out to Director of Ethics Michael Sande or Deputy Director of Ethics Erin Lynch directly.

Deputy Director of Ethics Lynch further explained that the staff tries to turn requests around as quickly as possible, but response times can vary depending on the situation. She noted that if a written informal opinion is needed, the staff has internal deadlines to which it adheres.

Executive Director Berland called the Commission's attention to the Lobbying Division data on page three of the Operations Report. He explained that February was the second month of the new biennial period, and the number of registered individual and principal lobbyists had increased from 6,648 in January 2025 to 6,945 in February 2025. He stated that 899 registrations or registration amendments were submitted in February, bringing the 2025 year-to-date total submitted to 9,724. He noted that the small number of bi-monthly reports filed in February reflects the fact that because February is not a bimonthly reporting month. Similarly, while 4,935 Client Semi-Annual submissions were filed in January, a CSA filing month, only 177 were submitted in February. He added that the next Client Semi-Annual submission deadline will be in July.

Executive Director Berland noted that 2,637 lobbying inquiries were received in February, compared with 4,935 in January, also reflecting the fact that February was not a mandatory filing month as the number of lobbying inquiries fluctuates with the filing deadlines.

Commissioner Caraballo asked if the drop in the total number of lobbyists between the 2024 Year-to-Date total of 8,086 and the 2025 Year-to-Date total of 6,945 was significant. Director of Lobbying Carol Quinn answered that since 2024 was the second year of the 2023-2024 biennial period, there would be more lobbyists registered cumulatively by the beginning of the second year

of the two-year period. She added that January 2025 was the start of the 2025-2026 biennial period, and while most of the registrations are received at the beginning of the period, registrations will continue to come in as the period progresses. Executive Director Berland further explained that lobbying contracts terminate at the end of the biennial cycle, and in order to continue lobbying, lobbyists must re-register, resulting in a spike at the beginning of the biennial period, with additional registrations continuing throughout the biennial period.

Commissioner James asked Director of Lobbying Quinn to what she attributes the reduction from 9,328 to 5,406 submitted bi-monthly reports from 2024 to 2025. Director of Lobbying Quinn and Executive Directive Director Berland responded that in line with the increased registrations throughout the two-year cycle, as lobbyists become registered in the system, they begin submitting bi-monthly reports.

Executive Director Berland turned to the Financial Disclosure Unit's statistics on page four of the Operations Report. He noted that 406 Financial Disclosure Statements were submitted in February 2025, largely from new employees who are obligated to file within 30 days of commencing State employment. He reported that 327 failure-to-file notices were issued in February 2025, with 61 of the filings remaining outstanding as of March 4th, and that 72 notices of delinquency (NODs) had been issued, with 18 of those resolved as of March 4th.

Executive Director Berland noted that in response to Commissioner James' request at the previous Commission meeting, the breakdown of the 41 outstanding notices of delinquency shown in the February report showed that 7 were issued to first-time filers and 34 to annual regular filers. He reported that two of the 34 annual filers have since filed, but none of the first-time filers have, so the number of delinquent filers outstanding from prior periods has declined to 39. He explained that the next step is for the Financial Disclosure Unit to turn the 39 matters over to the Investigations and Enforcement Division for follow-up.

Commissioner Edwards asked if there were fees involved in failing to file financial disclosure statements. Executive Director Berland explained that there are no late fees associated with failing to file, but substantial penalties can be assessed once the matters are moved to enforcement

proceedings. Commissioner Edwards suggested looking into legislative changes to impose fees at earlier dates in the FDS late filing process, noting the amount of staff time and resources getting filers into compliance. Executive Director Berland stated that while the statute does not allow for assessing late fees on filers who have failed to file, staff has been very effective in achieving compliance as there are now only 39 outstanding filings for a population of over 32,000 filers. Commissioner Edwards was concerned that staff resources could be used more strategically, and Chair Austin suggested that the Legislative Committee could look at potential legislation.

Commissioner James asked if the agency tracks individuals who consistently do not file on a timely basis and suggested that Commissioners see that information before deciding whether to propose legislation. Executive Director Berland explained that filing behavior is recorded in the system with most individuals filing electronically, and the individual delinquency notices are posted on the website. Commissioner Caras noted that New York City filing laws assess late fees for untimely filings and offered to bring that information back to the Commission.

Assistant Director of FDS Andrea Robbins stated that of the 327 failure-to-file notices issued on February 3rd, after staff outreach, 17 filers remain outstanding. She noted that out of the 327 failure-to-file notices sent, 309 were to non-academic filers, and 18 were to academic filers. She added that no more 2023 failure-to-file notices are to be issued, and staff is preparing for the 2024 filings due May 15, 2025.

Executive Director Berland turned to the Training Unit statistics on page five of the report, explaining that staff is continuing to report, separately, the online trainings conducted by COELIG's training staff and those conducted by agency ethics officers and trainers in the field, as well as on-demand trainings. He cautioned that the agency-level totals are not final, because although the training and tracking system we have built in coordination with ITS is very sophisticated, we are still not yet at the point where all State agencies are in the system, and so a good deal of manual data input from the field and from COELIG is still required as we work to bring all agencies into the SETA system. He noted that, for example, the aggregate total of on-demand and live training completed for January was originally reported last month to be just under 8,200, but after additional reporting, the reported total for January now exceeds 12,000. Likewise,

the current aggregate total of 8,049 on-demand and live trainings reported for February will go up over time, as well as the year-to-date total of 20,204. He stated that to reach the Commission's goal of 330,000 employees having received a full two-training cycle by the end of the year, an average of 27,500 individuals must receive training each month.

Commissioner Caras noted that discussions were held in the Education Committee meeting over challenges in reaching this goal that may not be able to be overcome and asked if the Commission is taking any action or getting assistance from outside the agency in increasing the numbers. Executive Director Berland stated that the Commission's on-demand training module is being underutilized, in part because it is not being sufficiently utilized by those who have access to it and partly because only 60% of the more than 380 agencies have access to the SLMS system, and while a number of agencies have compatible learning management systems, others do not. Staff has obtained a proposal from a unit at Rockefeller College for converting the training module for widely available use and for ADA and multiple language accessibility. In addition, training unit staff has licensed software to make improvements on their own and to expand the availability of the training. It is not an inexpensive process, and COELIG and the other agencies will incur costs in expanding the training to other platforms. Executive Director Berland reported that the Training Unit has been hosting live sessions with agency ethics officers to address concerns and provide added resources in response to the feedback from the survey.

Commissioner Edwards noted the barriers staff mentioned go beyond technology and platforms and include instances where the training requirements conflict with union regulations, as well as difficulties reaching employees in unique workplaces like hospitals, and stated that overcoming these barriers is necessary to achieve the Commission's training goals. Executive Director Berland noted that he and Director of Ethics Michael Sande have had productive conversations with one major authority with respect to union issues and that authority shared a training module it had prepared, which would need to be approved by the Commission. He added that there will be a follow-up meeting with that authority's leadership to see what progress is being made, keeping in mind that budget and other challenges will need to be factored in, but the authority recognizes its employees have to comply with the training requirements.

Chair Austin was concerned that individuals may be less incentivized to complete the training if the program is the same every year and asked if there was a penalty for not taking the training. Executive Director Berland explained that part of the training system being built will involve communications and messaging, as well as incentives for completing and disincentives for not completing the training, but all of these features will have associated costs. He added that part of the legislative agenda is to propose some kind of sanction for non-compliance with the mandated lobbying training, and perhaps the Commission could consider whether a similar penalty could be proposed with respect to State employees who fail to complete the training requirements.

Chair Austin suggested that, in order to disincentivize non-compliance with the training requirement, hearing officers could look at a subject employee's training history as a factor when determining a penalty for ethics violations and asked whether the Commission needed legislation to allow for that possibility. Commissioner Caraballo proposed looking at training completion when evaluating cases and discussing disincentives at the workplace level. Executive Director Berland suggested deferring the discussion to Executive Session.

Executive Director Berland turned next to the Audit and Review section of the Operations Report, on page six, reporting that the unit had largely finished the targeted FDS review process, with the focus now on random reviews of financial disclosure statements. He stated that 113 random reviews were completed in February, bringing the year-to-date total to 223, with the unit's goal to complete the random reviews before the next round of FDS filings are submitted in May. Executive Director Berland added that the unit had completed 990 targeted FDS reviews in 2024, a substantial increase from 2023, because 2024 was an election year and candidate FDSs are included in the targeted review pool.

Deputy Director of Compliance Audit and Review Gareth Perrin reported that the unit is more than halfway through the random FDS reviews and will shift focus back to the targeted FDS reviews after the May filing deadline; he expects that the numbers will be approximately the same as the aggregate total for the prior year.

Executive Director Berland added that the unit's goal has been to complete a total of about 1,800 to 2,000 targeted reviews, random reviews, and random lobbying audits, and the unit is recruiting for an additional auditor position.

Commissioner Caraballo asked if the auditing system the unit had been working on was up and running and, if so, whether it made a significant difference in the unit's work. Deputy Director of Compliance Audit and Review Perrin confirmed that the software was operational and more efficient than the prior system, explaining that the unit has used the software for lobbying audits and intends to expand its use to the FDS reviews in May.

Executive Director Berland turned to page seven of the Operations Report, the statistics for the Public Information Office. The unit received 13 new FOIL requests and provided records in response to seven FOIL requests, totaling 1,278 pages, with 17 record requests, all timely, pending in February. He noted that, in addition to handling FOIL requests, which is just the tip of the iceberg, there is a huge amount of other work Director of Communications, Public Information Officer, and Director of Public Affairs Emily DeSantis and her group perform including posting and disseminating information about the Commission and its work on social media, assisting with training sessions, handling all press communications, and facilitating the agency's work with the legislature. Director of Communications, Public Information Officer, and Director of Public Affairs DeSantis reported that in February, the Division has been busy with meetings with various legislators, and staff has begun gathering materials for the annual report, so she will be reaching out to commissioners for their biographies soon.

Commissioner James asked what social media platforms the Commission is on, about the decrease in followers from January to February 2025, and if the number represents new or cumulative followers. Director of Communications, Public Information Officer, and Director of Public Affairs DeSantis explained that the number is cumulative. The number of followers has dropped a little bit from last year, mainly due to the migration away from the platform "X." She explained that her unit has looked into what platform users have migrated to, but the usage is scattered, and COELIG is currently on X, Facebook, Instagram, and LinkedIn. Commissioner James noted that the 2025 year-to-date total should be 724 followers instead of 1,424 followers.

FY 2024-2025 Budget Update

Executive Director Berland explained that while COELIG sought an increase of $844,000 in next year's budget, the Governor's proposed budget for the agency is flat, except for an increment of $250,000 to pay legal fees carried over from JCOPE. He noted that he had submitted testimony to the legislature and met with relevant legislative committee chairs to discuss the budget. Executive Director Berland stated that part of the resistance to giving the agency more funding was concern that the agency's investigative function and possibly other functions might not survive the *Cuomo* litigation. Following the favorable Court of Appeals' decision, conversations with the Division of the Budget and the Executive Chamber have resumed, and we are somewhat optimistic. He will update the Commissioners as budget discussions develop further.

Executive Director Berland reported the agency will be ending the current fiscal year with a greater surplus than anticipated because of the hiring difficulties experienced over the past year. He noted that the favorable outcome for COELIG in the litigation with former Governor Andrew Cuomo has already impacted recruiting across the agency. He reported that the staff is undertaking processing a number of procurements before the end of this fiscal year to take advantage of the surplus.

Commissioner Per Diem Payments

Executive Director Berland stated there were no per diem payments in March, but he expects the payments to be made in April. He offered to read the estimated per diem amounts into the record upon request. There was no request that he do so.

Recruiting Update

Executive Director Berland announced that shortly after the February Commission Meeting, a new Training Associate, Becky Carozza, started in the Education and Training Unit. He also noted that the agency is awaiting approval from the Division of the Budget for an Assistant Filings Specialist to start, and an applicant for a Training Assistant position has also accepted an offer to join the agency.

Executive Director Berland stated that the following positions are posted: Investigative Counsel and Confidential Investigator in the Investigations and Enforcement Division; several Filing Specialist positions in the Lobbying Division; several positions in the Training Unit; and a Compliance Auditor position in the Compliance, Audit and Review Unit, for a total of 8 positions posted. He announced a change in the staffing plan, with one of the Associate Counsel positions in the Advice and Guidance Unit also working for the Lobbying Unit to assist with legal queries.

CHAIR REPORT AND COMMITTEE REPORTS

Chair Austin stated that due to illnesses last month, committees could not meet before February's Commission meeting, but they have been very active and thanked the committee chairs for their hard work. He thanked Commissioner Caraballo for stepping up to chair the Legislative Committee in Commissioner Cardozo's absence and Director of Investigations and Enforcement Weinberg for making closing cases more efficient.

Administration Committee

Commissioner James, chair of the Administration Committee, reported that the Committee met on March 11th, and discussed closing procedures, which will be addressed in executive session. The Committee also discussed adopting *Robert's Rules of Order*, but that issue may be tabled until next month. They also talked about the staff evaluation process and how to handle *de minimus* or minor matters. Commissioner James noted these types of matters must first be defined, with staff providing a recommendation, and the Committee will revisit this matter in six months.

Legislative Committee

Commissioner Caraballo reported that the Legislative Committee met on March 11th and discussed proposed legislation that was not included in this year's legislative agenda. There were 28 legislative proposals, but after discussion, the Committee decided against adding further legislative proposals to the Commission's legislative agenda for the current term. She stated that the Committee would study the issues noted with the remaining proposals and return to the Commission with their work.

Education Committee

Chair Austin thanked the Education Committee and Commissioner Edwards for preparing a report with a three-year plan to share with the Commission.

Commissioner Edwards summarized that last month the Commission approved the goals and objectives for 2025-2028 and it was agreed that the Education Committee would return with an action plan to achieve those goals. The plan includes supporting staff's recommendations to hold off on a new three-year goal until next year, when there will be more data on staff challenges in achieving the statutory training objectives. The Committee members thought 2025 could be used as a base year, since it will be the first single year in which the full training requirements will be sought to be met, and then staff could, in 2026, come back to the Commission with a plan of how to execute the training goals over the next two years. The plan also addresses commissioners' concerns about measuring the effectiveness of the training program. Commissioner Edwards stated that the Education Committee would like the Commission to adopt the strategic plan for 2025-2028.

Commissioner James noted that one goal in the strategic plan is to retain a qualified consultant to develop a plan to measure the training program's achievements and wondered if that could be done internally now that staff includes a research data analyst. Executive Director Berland explained that the undertaking is not purely statistical. Although Research Data Analyst Kaufman has much experience collecting and analyzing statistics and could assist in the process, an outside consultant is needed to develop the metrics and the system and plan necessary to measure the effectiveness of the training program and its achievements against its purpose, and who has the expertise to look at the current training model, which is essentially an expansion of the training model previously used, and assess whether it is the ideal model and the most cost-effective and efficient way to deliver ethics training, and whether it is effective in achieving the intended goal.

Commissioner Groenwegen expressed concern about the Commission committing a portion of the 2025-2028 budgets to the strategic plan without knowing what else the agency may need. Executive Director Berland explained that this is part of the normal budgetary process, and in the next budget cycle, this provision would be included along with the agency's other needs.

Commissioner Groenwegen understood this process but noted that, in light of recent legal developments, the agency may shift its budgetary focus to other divisions, such as the Investigations and Enforcement Division. Executive Director Berland stated that the agency's budget has always been built around meeting the complete staffing plan and carrying out all the agency's functions.

Commissioner Groenwegen noted that the proposed strategic plan details significant challenges that have impacted the training numbers and stated that she believes the primary training objective should be to address the identified problems, train as many individuals as possible, and be less focused on the efficacy of the training. She questioned the need for a resolution from the body to commit to a three-year plan instead of focusing on a near-term problem.

Executive Director Berland clarified that staff is not advocating for any period beyond the one-year assessment. Commissioner Edwards added that the Commission has historically approved three-year plans.

There was continued discussion, with Commissioner Groenwegen clarifying that she believes the agency's short-term focus should be on using the limited staff time and resources to address the obstacles preventing the agency from meeting its obligations. Commissioner Edwards clarified that in the first year of the plan, staff would begin examining, identifying, and budgeting the resources needed for research, which would not begin until 2027, considering the staff's priorities.

Executive Director Berland noted that staff is doing everything it can do to ensure that as many people as possible are receiving the training, including crafting protocols that are consistent with the statutory requirements, designing the trainings and making them available to the agencies and developing the on-demand ethics refresher course, communicating to agency ethics officers what we and the state are expecting of them, working with agencies to expand the on-demand module to other learning management systems, and collecting all the information we can to enter into SETA. He further explained that staff would like to complete the original plan, which goes through the end of 2025, with the established goal of completing a full training cycle for the entire State workforce within COELIG's jurisdiction and would like to take the information collected and

assess the practical training structure and determine what additional resources will be needed to deliver the training to everyone going forward.

There was further conversation, with points made by Commissioner Groenwegen about whether it is premature for the Education Committee to plan three years out and have the Commission memorialize a proposal, when the staff is committed to thinking through the end of the year, and clarifications from Commissioner Edwards and Executive Director Berland about how the Commission approved the goals in the previous meeting, and this would be a motion to approve a strategy, and not a proposal, which alleviated Commissioner Groenwegen's concerns.

Commissioner Edwards made a motion to approve the three-year strategic plan brought forth by the Education Committee, which Commissioner Caraballo seconded. The motion passed unanimously.

Director of Communications, Public Information Officer, and Director of Public Affairs DeSantis gave a quick update on the legislative agenda, reporting that staff met with four members of the legislature: Senator Shelley Mayer, Senator James Skoufis, Assembly Member Karen McMahon, and Senator Liz Krueger, and has an upcoming meeting scheduled with Assembly Member James McDonald. She stated that all have expressed being supportive COELIG's legislative agenda and reported that five proposals have been introduced this legislative session, with three of them introduced in both houses. Those five proposals were the training noncompliance penalties for lobbyists and clients; requiring the electronic submission of lobbying filings; posting the financial disclosure statements of candidates; requiring the electronic filing of all Financial Disclosure Statements; and eliminating the physical access requirement for advisory committees and subcommittee public bodies. She noted that Senator Skoufis supported their accessorial liability proposal, and the agency had received support from good government groups for its budget needs and a number of the legislative proposals.

MOTION TO ENTER INTO EXECUTIVE SESSION PURSUANT TO PUBLIC OFFICERS LAW § 105 AND EXECUTIVE LAW § 94(11) TO ADDRESS MATTERS CONCERNING EMPLOYMENT OF PERSONNEL, PENDING LITIGATION, AND INVESTIGATIVE AND ENFORCEMENT MATTERS THAT ARE CONFIDENTIAL PURSUANT TO SECTION 94 OF THE EXECUTIVE LAW

Commissioner Caraballo made a motion, seconded by Commissioner Caras, to enter into Executive Session, in accordance with Public Officers Law § 105 and Executive Law § 94 (11), to address matters concerning employment of personnel, pending litigation, and investigative and enforcement matters that are confidential pursuant to § 94 of the Executive Law. The motion carried unanimously.

PUBLIC ANNOUNCEMENT OF ACTIONS FROM EXECUTIVE SESSION

Executive Director Berland reported that the Commission discussed litigation matters and legal advice in the Executive Session. The Commission discussed an application for exemption from the post-employment restrictions outlined in Public Officers Law §73(8-b) and for informal guidance pursuant to Public Officers Law §73(4)(a), Executive Law §94(7) and Part 932 of the Commission's regulations and discussed other guidance matters. The Commission also discussed steps in several investigative matters and discussed several other investigative matters.

PROPOSED RESOLUTION CONCERNING REQUESTS FOR ETHICS TRAINING EXTENSION AND EXEMPTION REQUESTS*

Commissioner Caraballo made a motion, seconded by Commissioner Edwards, to send the proposed resolution back to staff and have staff draft a proposed regulation addressing the procedure for ethics training extension and exemption requests. The motion passed unanimously.

PUBLIC OFFICERS LAW §§ 73(8-B) AND 73(4)(A) – REVISITING THE DECEMBER 2024 HOMES AND COMMUNITY RENEWAL 8-B REQUEST

Commissioner James made a motion, seconded by Commissioner Groenwegen, to table revisiting the decision responding to the Homes and Community Renewal § 73(8-b) request in December

2024, with staff drafting an Advisory Opinion for the Commission to review at the next meeting. The motion passed unanimously.

RESOLUTION ON COMMISSION MEETING RULES OF ORDER*

Commissioner James, chair of the Administration Committee, made a motion that Commissioner Groenwegen seconded to table the resolution. Commissioner Groenwegen stated that, at one time, the body was considering a resolution on meeting rules, which fell off the agenda. During the Administration Committee meeting, there was a discussion about the applicability of *Robert's Rules of Order* to the Commission's meetings and whether to create a freestanding resolution or incorporate it in a broad meetings resolution. She reported that the revived resolution was circulated to Chair Austin, Commissioner James, and Executive Director Berland the day before and did not feel it was appropriate to have Commissioners consider the resolution without having ample time to comment on it or make suggestions.

The motion carried unanimously.

NEW AND OTHER BUSINESS

Chair Austin announced that an election for Chair and Vice-Chair will be held at the April commission meeting.

MOTION TO ADJOURN THE PUBLIC MEETING

Commissioner Caras made a motion, seconded by Commissioner James, to adjourn the meeting. The motion carried unanimously. The meeting was adjourned.