



January 9, 2026

The Honorable Kathy Hochul
Governor of New York State

RE: Upholding the Relevance and Importance of COELIG

Dear Governor Hochul,

We write today as organizations that have consistently advocated for a robust, independent, and fully functioning statewide ethics commission. In that vein, we are writing to urge you to promptly fill commissioner vacancies for the Commission on Ethics and Lobbying in Government (COELIG) – three of which fall under your appointment authority. As it currently stands, COELIG cannot operate with the effectiveness New Yorkers deserve.

After taking office in August 2021, you led the effort to dismantle the discredited Joint Commission on Public Ethics (JCOPE) and championed the creation of COELIG as a "truly independent and effective ethics agency" with real teeth to hold public officials accountable.

However, under Executive Law § 94(4)(h), COELIG can only act by a majority vote of its **full membership**. With only 8 of the 11 seats currently filled, 3 "no" votes effectively block any finding or action—regardless of whether a majority of seated commissioners believe sufficient evidence exists to issue a Substantial Basis Investigation Report.

This structural paralysis directly results from unfilled appointments, including vacancies under your authority that remain open for extended periods. You have the power and the duty to fill these vacancies once they occur. Every pending investigation, every future complaint, every effort to hold public officials accountable for ethical violations is undermined when the Commission cannot reach the threshold needed to issue findings.

The "new, truly independent watchdog with real teeth" you promised New Yorkers has been rendered toothless by vacancies.

This is not a theoretical matter, as demonstrated by one recent case. As reported by [several news outlets](#) in late November, COELIG closed a case alleging sexual harassment against a former Senator despite the fact that the Commission found, in a 5-2 vote, that the alleged non-consensual kissing had occurred (the case was heard and voted on by 7 commissioners; one newly appointed commissioner recused).¹ This is not about one case, or one person, or one respondent. We sign this letter on behalf of *all* New Yorkers who deserve a fully functioning and independent state ethics commission that can provide full and fair adjudication and accountability.

New York's ethics system cannot function as designed—and cannot fulfill its mission to "restore public trust in government"—without a fully seated Commission. State employees who take the brave step of coming forward to report potential violations deserve better.

For these reasons, we urge you to honor the commitments you made when you assumed office and created COELIG by filling your final vacancy expeditiously, and ensuring every future vacancy is filled as soon as possible.

¹ In the interest of full disclosure, that allegation is made by Erica Vladimer, who signs this letter on behalf of Harassment-Free New York. The at-issue COELIG letter is attached and available here: <https://ethics.ny.gov/system/files/documents/2025/11/case-no.-18-015-letter-11.19.25-final-signed.pdf>. It is worth noting that, if all vacancies are filled, the majority vote needed to move forward is 6 out of 11, or 55% of votes. COELIG remarks in its letter that the case cannot move forward since there are not 6 votes in favor. Six out of seven commissioners is 86% of votes, a much higher percentage than what the statute contemplates. We raise this case for illustrative purposes only – to demonstrate that a fully constituted commission operates, deliberates and makes determinations in a far different manner than one that is partially constituted.

Respectfully,

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Executive Director
Citizens Union

Evan Davis
Manager
Committee to Reform the State Constitution

Erica Vladimer
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Harassment-Free New York

Elizabeth Kocienda
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