



**Testimony to the New York City Conflicts of Interest Board (COIB)  
on Proposed Rules Regarding Reporting of Travel Payments**

***Re: Third-party travel payments should be banned; Disclosures show gifts of at least \$215K to electeds, \$186K to city agencies for travel expenses***

June 23, 2026

Thank you for the opportunity to provide testimony for this hearing. My name is Rachael Fauss, and I am a Senior Policy Advisor for Reinvent Albany. Reinvent Albany advocates for transparent and accountable government in New York.

We appreciate that the Conflicts of Interest Board (COIB) reopened public comment on its [proposed rules](#) for travel payments in response to our [September 2025 testimony](#) and the comments of others.

We continue to believe that New York City needs to be bolder in its response to the scandals that occurred during the [Eric Adams administration](#) – many of which included travel payments. Given the [large number](#) of [press](#) accounts, we think it is obvious that the public is concerned that special interests are attempting to influence city officials by paying for their travel.

While we support the modest changes that COIB suggested – aligning the reporting threshold to \$1,000 for all reports by agencies and individuals, and ensuring that travel be “government-class” – we again ask the COIB to think big and ban third-party travel payments altogether. COIB excludes travel payments from the gift ban under certain conditions – not NYC law – and it is up to COIB to undo this allowance.

Lastly, we ask COIB to revisit its decision to not post on its website the financial disclosures of elected officials who have left office. Section 12-110 of the Administrative Code simply states that disclosures from “each elected officer described in sections four, twenty-four, twenty-five, eight-one, ninety-one and eleven hundred twenty-five of the New York city charter shall be made available for public inspection on the board’s website without written request.” We see no reason that this should not apply to disclosures filed by former officials that cover the years they were in public office.

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For example, the 2021 financial disclosures published on COIB’s website do not include former Mayor Bill de Blasio. Similarly, in 2025, a disclosure filed by Zohran Mamdani is posted, showing travel payments paid by his transition committee, but Eric Adams’s 2025 disclosure is not currently on COIB’s website. The 2025 disclosure for Eric Adams is of particular public interest, and likely has information about travel payments that could be topical for today’s hearing.

### ***New data on disclosures shows hundreds of thousands in travel gifts***

Our testimony provides new data about the scope of travel payments that shows they are significant, and are increasing as public officials are resuming travelling after the COVID-19 pandemic. We found \$77,025 in travel payments reported by elected officials [on their financial disclosures](#) in 2024, and \$28,000 reported for 2025 – however, as noted previously, incumbents from 2025 who left office are not included, as their forms are not currently on COIB’s website, like Eric Adams.

In 2025, [city agencies reported gifts](#) of \$186,788 listed explicitly for travel expenses, and we believe even more gifts are likely related to travel (\$24,350 in in-kind donations from transportation companies, and \$247,520 in payments for conference attendance). More details are provided below.

### ***Research finds that buying influence works***

Behavioral science confirms what we already know from experience: gifts are used to influence individuals and their decisions. In Reinvent Albany’s 2023 report, [Buying Influence Works](#), we reviewed literature in various fields: political science regarding campaign contributions, medical journals examining pharmaceutical companies’ influence over doctors, and lastly, studies (on studies) that find that industry-funded research is skewed. We have no reason to believe that behavior is any different regarding gifts of travel payments to public officials or city agencies.

### ***COIB exempts travel payments from gift rules through rule and opinion***

COIB is responsible for interpreting [Chapter 68 of the City Charter](#), which contains the city’s Code of Ethics and standards for conflicts of interest. Nowhere in Chapter 68 are travel payments specifically discussed. [Section 2604](#) defines prohibited interests and conduct, and [Section 2607](#) provides that COIB has jurisdiction over complaints regarding lobbyist gifts, which are prohibited under [Section 3-255](#) of the Administrative Code.

- Section 2604(b)(5) of the City Charter specifically provides that gifts may not be accepted from those whom the public servant “knows is or intends to become engaged in business dealings with the city.”

- Section 3-255 of the Administrative Code states that “No person required to be listed on a statement of registration pursuant to section 3- 213(c)(1) of subchapter 2 of this chapter shall offer or give a gift to any public servant.”

Interestingly, the only mention of travel in city law we could find regarding ethics is in [Section 12-110](#) of the Administrative Code, the Annual Disclosure Law, which relates only to reporting.

Given these prohibitions, travel payments fitting certain criteria have been excluded from these gift bans by COIB through [Sections 1-01 and 1-16 of its rules](#):

- Section 1-01 excludes travel payments from the prohibitions of Sections 2604(b)(3) and (b)(5) of the City Charter, if:
  - the trip is for a City purpose and could properly be paid for by the City;
  - the travel arrangements are appropriate to that purpose;
  - the trip is no longer than reasonable to achieve the City purposes;
  - the public servant received agency head approval in advance; and
  - solicitation of the payment and reporting abides by [Board Rules § 1-14](#).
- Section 1-16 provides an exclusion to the lobbyist gift ban, provided that the travel expenses are paid as a gift to the City, rather than the public servant, so long as it meets the same first three conditions of Section 1-01 above.

***COIB must reverse course and ban third-party travel payments – in particular from lobbyists and those who do business with NYC***

Because COIB has created the exclusion to the gift ban for travel payments by rule, we therefore believe you can undo it, and ban third-party travel payments. In particular, we see no reason that travel payments are allowed under any circumstance from those who do business with the City or are registered lobbyists, given the specific restrictions in Section 2604(b)(5) of the City Charter and Section 3-255 of the Administrative Code.

***Electeds’ financial disclosures show wide range of travel payments***

The total value of travel payments reported by officials has increased since 2020 and 2021, when travel was limited due to the COVID-19 pandemic (data from before 2020 is not published on the COIB website, so it is not included in our analysis). In 2024, there were at least \$77,025 worth of travel payments, and \$28,000 were reported in 2025. Donations totalled \$214,625 from 2020 to 2025 for the disclosures published on COIB’s website.

## Minimum Value of Travel Payments Gifted to NYC Elected Official Financial, 2020-2025

Includes either minimum value of range or exact amount, when provided.

Year ▲	Total Reported
2020	\$3,000
2021	\$1,000
2022	\$66,000
2023	\$39,600
2024	\$77,025
2025	\$28,000

Table: Reinvent Albany • Source: Summary of COIB Financial Disclosure Statements • Created with Datawrapper

The list of the organizations providing travel payments below shows a wide range of interests. Reinvent Albany takes no position on the particular policy or political issues discussed or raised by these outside organizations during these trips. We do, however, question whether it is good public policy for city travel to be funded by outside groups. If the trip is truly related to the official duties of elected officials, we see no reason why they should not be paid for by taxpayers – and subject to the same transparency and public scrutiny as they are now.

## Minimum Value of Travel Payments Gifted by Organization, 2020-2025

Includes either minimum value of range or exact amount, when provided.

Organization Name ▲	Total Reported
America-Israel Friendship League (AIFL)	\$1,000
Assembly of the World Diasporas	\$15,000
Association of Prosecuting Attorneys	\$1,000
Attorneys General Alliance	\$5,000
Climate Jobs Institute at Cornell University ILR School	\$20,000
Combat Antisemitism Movement	\$1,000
Community Leaders of America	\$4,000
Concordia	\$1,000
Consulate General of the Dominican Republic	\$1,000
Council For American Ireland Relations	\$7,000
Delta Air Lines	\$1,000
European Janusz Korczak Academy	\$7,000
Fair and Just Prosecution Organization	\$5,325
Fondazione Fratelli Tutti	\$1,000
Government of Colombia	\$1,000
Jewish Community Relations Council	\$98,600
Korean Prosecutor's Bar Association	\$1,000
LGBT Victory Institute Conference	\$1,000
Local Progress (a project of the Center for Popular Democracy)	\$22,000
Mobius Conference	\$1,000
Municipality of Bat Yam, Israel	\$1,000
New Deal Leaders	\$3,000
North Capital Forum	\$1,000
Northwestern University	\$2,000
Queens Economic Development Corporation	\$1,700
Regional Planning Association	\$2,000
RFK Human Rights	\$3,000
SEAP--Tides	\$1,000
The Blue Card	\$1,000
UJA-Federation of New York	\$1,000
Uzbekistan Mission at the U.N.	\$1,000
Zohran Mamdani Transition 2025	\$2,000

Table: Reinvent Albany • Source: Summary of Conflicts of Interest Board Financial Disclosure Statements • Created with Datawrapper

**Disclosures of gifts to the City show even more travel payments**

As COIB noted in the proposed rules change, city agencies must report annually by February 28th, “the name of any individual or firm that made one or more donations totaling \$5,000 or more to the agency during the previous calendar year, the total amount of these donations, and whether the donation was cash or an in-kind donation,” (Board Rules § 1-14(c)(1)). COIB makes these reports [available on its website](#) in XLS format, and also [publishes these reports as open data](#).

COIB also stated that “agencies’ reports are not required to include details about underlying travel paid for by third parties, and it is not apparent from the text of the rule that it applies to unsolicited gifts of travel related expenses.” Despite the lack of clarity, agencies have provided some details to COIB in these disclosures that explain the purpose of gifts, and in some cases explicitly say they are for travel expenses.

Reinvent Albany reviewed agencies’ disclosures from 2019-2025 and tallied possible travel payments in three separate categories: in-kind donations from transportation companies (\$104k); gifts explicitly labeled as payments for travel expenses (\$232k); and payments made for conferences where travel may be a part of the donation (\$248k). All payments in these categories totalled \$585k from 2019-2025.

Not included in this analysis are donations made to the city from other government agencies. We also note that while our categories may capture gifts that are not travel payments – for example if a transportation company’s in-kind donation was for something other than travel – overall this analysis is likely an undercount given the lack of clarity in the current rules.

At right is a listing of the total amount of donations to city agencies in these categories by year. On the next page is a list of all donors providing these gifts. Thank you again for the opportunity to provide testimony.

Year	Conference attendance	In-kind from transportation company	Travel expenses	Grand Total
2019		\$15,000		\$15,000
2020		\$22,900		\$22,900
2022		\$7,500	\$45,929	\$53,429
2023		\$21,021		\$21,021
2024		\$13,500		\$13,500
2025	\$247,520	\$24,350	\$186,788	\$458,658

Table: Reinvent Albany • Source: COIB • Created with Datawrapper

## Possible Travel Gifts to the City Reported by Agencies

Includes payments for travel expenses, and possible travel payments (in-kind from travel companies, and for conference attendance) reported from 2019-2025

Name of Donor (Individual or Firm)	In-kind donation from transportation company	Travel expenses	Conference attendance	Grand Total
American Water Works Association		\$27,664		\$27,664
Association of Public Health Laboratories		\$15,155		\$15,155
Big Cities Health Coalition		\$9,435		\$9,435
Bloomberg Philanthropies Support LLC		\$9,574		\$9,574
Council of State and Territorial Epidemiologists (CSTE)		\$9,586		\$9,586
Delta Air Lines	\$39,521			\$39,521
Institute for Healthcare Improvement		\$32,125		\$32,125
IPEM, International Private Equity Market and Accelerate Investors			\$7,037	\$7,037
KORIED, LLC			\$5,390	\$5,390
Lyft, Inc.	\$30,400			\$30,400
Media Analytics Limited d/b/a Global Water Intelligence/Leading Utilities of the World		\$24,831		\$24,831
Milbank Memorial Fund		\$5,171		\$5,171
Milken Institute			\$200,017	\$200,017
National Family Planning & Reproductive Health Association (NFPRHA)		\$6,667		\$6,667
New York Water Environment Association		\$65,344		\$65,344
Partnerships for Healthy Cities		\$9,573		\$9,573
PEI Group			\$8,321	\$8,321
Promega Corporation		\$6,005		\$6,005
RFK Human Rights			\$20,000	\$20,000
Sahar Global Summits			\$6,755	\$6,755
The Learning Adventure (Transforma Travel Group LLC)	\$14,350			\$14,350
Uber	\$20,000			\$20,000
Water Research Foundation		\$6,060		\$6,060
Water Research Foundation, Water Environment Federation, National Association of Clean Water Agencies		\$5,527		\$5,527