

**MINUTES OF THE PUBLIC SESSION OF THE
OCTOBER 7, 2015
COMMISSION MEETING
OF THE JOINT COMMISSION ON PUBLIC ETHICS
HELD AT THE COMMISSION'S OFFICE LOCATED AT
540 BROADWAY
ALBANY, NEW YORK**

Chair: Daniel J. Horwitz (NYC)

Members: David Arroyo (NYC)
Hon. Joseph Covello (ALB)
Marvin E. Jacob (ALB)
Hon. Eileen Koretz (NYC)
Gary J. Lavine (ALB)
Hon. Mary Lou Rath (BUF)
David A. Renzi (Webex)
Michael A. Romeo, Sr. (ALB)
Hon. Renee R. Roth (NYC)
Michael K. Rozen (Webex)
Dawn L. Smalls (NYC)
George H. Weissman (ALB)

Members

Absent: Seymour Knox, IV

Staff:

Monica J. Stamm, General Counsel
Kevin T. Gagan, Chief of Staff
Martin L. Levine, Director of Lobbying and Financial Disclosure Compliance and Senior Counsel
John P. Harford, Special Counsel and Director of Ethics and Lobbying Compliance
Stephen Boland, Director for Administration
Walter J. McClure, Director for External Affairs
Pei Pei Cheng-deCastro, Director of Investigations and Enforcement
Emily A. Logue, Investigative Counsel
Stacey Hamilton, Manager of Education Program and Special Counsel
Carol Quinn, Associate Counsel
Michael Sande, Associate Counsel
Patrick E. Coultry, Chief Investigator
Terence Mulderrig, Senior Investigator
Peter Smith, Confidential Investigator
Lori Donadio, Confidential Legal Assistant
Deborah Novak, Executive Assistant

I. CALL TO ORDER

Chair Dan Horwitz called the October 7, 2015 Commission Meeting to order.

II. APPROVAL OF MINUTES – PUBLIC SESSION

August 4, 2015

Commissioner Roth was absent for the approval of the minutes.

Commissioner Weissman asked Commissioner Romeo what he meant when he said, as reflected on page 3 of the August 4, 2015 Commission Meeting minutes, that the Commission should not micromanage the hiring process. Commissioner Romeo explained that, in his view, staff should be able to do the job that they were hired to do, where there are vacancies for daily jobs that need to be filled, staff should be able to fill them. As the issue before the Commission is approval of the minutes, Commissioner Weissman agreed to wait until later in the meeting to address additional questions he had, with assurances from Chair Horwitz that they would be addressed in the Public Session.

A motion was made by Commissioner Arroyo, which was seconded by Commissioner Koretz, to approve the minutes from the Public Session of the August 4, 2015 Commission Meeting. The vote was 9/2. Chair Horwitz and Commissioners Arroyo, Covello, Koretz, Lavine, Rath, Romeo, Rozen and Smalls voted in favor of the motion. Commissioners Jacob and Weissman were opposed to the motion. The motion carried.

Commissioner Weissman stated that in the April meeting the Commission was promised a spending plan related to the budget and asked whether a spending plan exists. Commissioner Weissman stated a concern about the Commission having information about how the Commission is spending money, hiring people, dealing with technology and other items that have come up. Commissioner Weissman stated that he is focusing on the large number of hires that have occurred, mainly the recently hired lawyers, and asked about the process that was followed when the new lawyers were hired.

General Counsel Stamm advised that Director for Administration Stephen Boland has a spending plan and that documents are available should any Commissioner wish to see it. The hires were done in accordance with that spending plan, which covers JCOPE's plans for technology investments as well as personnel, in addition to anticipating what JCOPE will spend this year as well as next year assuming that the budget stays the same. Commissioner Covello asked if any of the Commissioners had approved that plan. General Counsel Stamm stated that in the past, the Commissioners had not approved JCOPE's spending plans, but the information is available to all Commissioners. Commissioner Weissman stated that in the past it had always been shared with the Administrative Committee.

Commissioner Weissman then turned to the hiring process and asked where the jobs were posted for the three lawyers that were hired. Commissioner Roth questioned why the Administration committee was not involved in the hirings. Chair Horwitz stated that the statute provides for delegation of responsibilities from the Commission to the staff. There is longstanding authority from the Commission delegating hiring to the staff. At times, the Commission has had members perform an advisory function in the staff's management and hiring decisions. The Administration Committee has met at various times, but some people who were on that committee have left. Chair Horwitz asked General Counsel Stamm to walk the Commission through the hiring process to address Commissioner Weissman's question.

General Counsel Stamm stated that she believes the process has not changed since she started with JCOPE and began filling vacancies. Positions are posted on the JCOPE website and the State website. Resumes are also received from Commissioners, as well as others. Staff does outreach and asks people to forward potential candidates. All resumes received are kept centralized by position electronically. Depending on the position, the relevant supervisors will take the lead in going through the resumes to find candidates they would like to interview. They will then interview those individuals and identify the top candidates. Then, depending on the position, if the relevant director was not involved, he or she would meet with those candidates and then the Executive Director

and/or the Chief of Staff would meet the candidates. At that time, the Executive Director, in consultation with other supervisors and the Chief of Staff, would make a decision as to who should be hired to fill the position. Once a decision is made, the Chief of Staff checks the references and handles the negotiations, working closely with the Executive Director in terms of making salary decisions consistent with the staffing plan. With respect to qualifications, General Counsel Stamm indicated that strong relevant experience and skills are the focus; a balance between public and private sector experience is desirable; and it is important that the person be a good fit for the agency. JCOPE has a good mix of personnel hired from the private sector and from the State, local and federal governments. Staff has been actively engaged in hiring since last fall because several lawyers have left or their departure was imminent. JCOPE receives dozens of resumes for each position. General Counsel Stamm stated that all of the recent hiring decisions were made before the end of July, and the hiring process has been ongoing for the last nine months, including the planned expansion when JCOPE received additional money in the budget.

Commissioner Weissman sought more specific information related to the three recent attorney hires. He referenced the person hired with the title of Special Counsel and Chief of Staff that was discussed at the last meeting. He asked how many people were interviewed for that position. General Counsel Stamm stated every lawyer that was interviewed over the previous months was considered for the vacant positions, as some of the vacancies were expected. Additionally, when a good candidate is interviewed, they are kept in mind for future opportunities. Commissioner Weissman stated that the position in question did not exist previously. General Counsel Stamm disagreed stating that she previously held the position of Chief of Staff. She was not special counsel but, as was discussed at the last meeting, secondary titles have never been a concern until Commissioner Weissman raised the issue; another person was special counsel in the past, and, at this point, JCOPE has three employees with special counsel as a secondary title.

Commissioner Jacob stated that he has compared the specific resolution of the Commission that occurred in February of 2012, which delegated authority to the

Executive Director to hire staff, to the statute, and found a stark difference. The statute states that the Commission may delegate authority to the Executive Director to act in the name of the Commission between Commission meetings. Between meetings is a term of necessity and is like an executive committee acting between meetings of a board. The Resolution does not use any of the language of the statute. It merely says that it delegates authority to the Executive Director to appoint staff as necessary to carry out the responsibilities of the Commission. The Commission has not given away all its authority to appoint staff. When the former Executive Director Letizia Tagliafierro called to advise him that she was leaving JCOPE, that was the first time he had heard about it. He had no knowledge that she was intending to leave or that she was negotiating for another position and he doubted that the other Commissioners knew. It was during that phone conversation that she informed him that she had hired a number of people he knew nothing about. She did not attend the next Commission meeting so he and the other Commissioners were not able to ask her anything about these appointments. These appointments could have awaited a Commission meeting. He stated he saw no statement of necessity for doing those hirings between meetings. Commissioner Jacob stated his agreement with Commissioner Weissman that it is important to drill down how these hirings happened, when they were discussed, who was interviewed, when were the positions posted, what other people were considered, etc. Commissioner Jacob stated he is troubled by this because these appointments were to positions that did not exist on the organization chart. Rob Cohen's Special Counsel designation and General Counsel's Stamm's Chief of Staff designation were combined and a position was created. The Commission never delegated authority to create a new position and assign to it a salary that pays more than anyone else employed by JCOPE. Commissioner Jacob requested of General Counsel Stamm, that if her position is that he is misreading the statute, or misunderstanding the delegation, to issue a written opinion that explains the law and the resolution and tells the Commission why, under the facts of what happened here, it complied with the statute.

Commissioner David Arroyo stated that he was not on the Commission in 2012 and is not knowledgeable as to the delegation but questioned whether they, as a Commission, really

want to be involved with hiring decisions. Hiring was rightfully within the scope of senior staff and he is hesitant to make a rule that the Commission should approve all staff. Obviously, statutorily, the Executive Director is a position the Commissioners must have a say in. He is not suggesting that for certain senior positions, the Commission should not be kept informed, but he is concerned about establishing some rule that would require all hiring decisions to make its way through the Commission.

Commissioner Smalls agreed with Commissioner Arroyo in terms of the Commission not needing to approve all hiring decisions. She noted that, like Commissioner Arroyo, she was not on the Commission when this delegation was passed but assumes it is not a Constitution and can be revisited. There is clearly great discomfort in this body about how some hiring is done. In the interest of charting a path forward, the Commission should revisit the delegation. Staff should have very clear direction about what they are authorized and empowered to do and what they are not, so the Commission is not revisiting the organization chart and hiring decisions at every meeting. With regard to the staffing decisions that were made in the last three months, Commissioner Smalls understands there is great disagreement about how and whether the decisions were authorized under the previous delegation. Commissioner Smalls stated that these people are in place now, so if there is not a remedy or an action that the Commission is seeking to take regarding these hires, she suggested that it is time to move on.

Chair Horwitz stated that this discussion continues some of the points that were raised at the August 4th Commission meeting. In particular, Commissioner Rath made statements about the Agency now being in a state of some maturity as opposed to where it was when the original delegation was made in the beginning of 2012 when the Agency was in its infancy. Chair Horwitz has spoken to a number of Commissioners about these issues and believes they need a principled and deliberate process to consider these questions. Chair Horwitz stated that the Commission is putting together a committee to help frame these issues for the full Commission and thanked Commissioners Arroyo, Rath and Smalls for volunteering to serve on this Committee.

Commissioner Jacob stated he raised this on August 4th at which time Chair Horwitz asked to defer it. Commissioner Jacob stated he had objected to the minutes of the August 4th Public Session because they did not contain that deferral. He stated he has a simple motion to make so that the Commission deals with the issue without further deferral. Commissioner Jacob stated that he wants to revoke the delegation, which has no impact without an Executive Director, and then have a discussion as to which levels should or should not be delegated.

Commissioner Jacob moved to revoke the delegation of February, 2012. After some discussion, Commissioner Jacob agreed that his motion was to revoke or suspend Paragraph 1 of the delegation relating to hiring pending review by the committee which will report back to the full Commission. Chair Horwitz read the relevant provision from the resolution for the record. “It is resolved that the Commission delegates authority to the Executive Director of the Commission the specific powers and duties enumerated below:

1. Pursuant to Executive Law §94, Subsection 9b, the authority to appoint staff as necessary to carry out the responsibilities of the Commission consistent with the staffing plan reviewed and approved by the Commission pursuant to Executive Law §94, Subsection 9b-1.”

Judge Roth seconded the motion. Commissioner Roth stated she appreciated the fact that most of the Commissioners are not going to review a collection of resumes for minor positions, but that is one of the reasons why they have an Administration Committee, which would take the time to look at these issues. Commissioner Roth suggested they should return to that process. Commissioner Roth stated that there is an undercurrent of dissatisfaction from a number of the Commissioners that has to be addressed because the Commission cannot function effectively and efficiently. Commissioner Roth was not aware that a new committee was being formed to look at these issues and volunteered to serve on the committee. Chair Horwitz thanked her for volunteering and stated if anyone wants to serve on this Committee to give him a call.

Commissioner Romeo responded to Commissioner Weissman's reference to Commissioner Romeo's comments at the August 4th meeting. Commissioner Romeo stated he has been involved in his own business, has had 40 people working under him and has sat on many boards. This is the first board that he has sat on where the board wants to be involved with the daily business dealings of the agency. The whole discussion is bad for staff morale, including calling certain positions "minor positions." All of the positions are important for the Commission and they should empower the staff to do what they were hired for. The Commissioners should oversee the staff but not to the point where they are calling staff, making them afraid to make decisions, and preventing staff from doing their jobs. Without good and happy staff, the business of the Commission will not go very well.

Commissioner Arroyo asked General Counsel Stamm if the passage of the motion would cause a problem to the staff in not making hires in the next couple of months. General Counsel Stamm stated that there are currently approximately six vacancies throughout the agency that need to be filled, including filing specialists, auditor, and attorneys. Chair Horwitz suggested that the committee speak with staff, determine whether there are any immediate needs and make a recommendation to the Commission at the October 27th meeting. Chair Horwitz noted that the terms of some of the Commissioners are about to expire towards the end of the year, with the potential for several new members in January, and the committee should be mindful of that fact.

Commissioner Weissman stated that if he understands the delegation, only the Executive Director can hire and they do not have an Executive Director. Chair Horwitz explained that passage of Commissioner Jacob's motion means staff cannot hire anyone. Chair Horwitz continued that any hiring decision at this point would have to be made by the Commission. Commissioner Jacobs affirmed. Chair Horwitz stated that this is why he said he would like the committee to talk with staff to see if there are any imminent hires that need to be made so they can be brought to the October 27th meeting for consideration.

The vote on the motion was 11/2. Commissioners Arroyo, Covello, Horwitz, Jacob, Koretz, Lavine, Rath, Roth, Renzi, Smalls, and Weissman voted in favor of the motion. Commissioners Rozen and Romeo were opposed to the motion. The motion carried.

Commissioner Covello stated that he wanted it on the record that while General Counsel Stamm is answering questions about the recent hirings, she was not the Executive Director and she is not responsible for these decisions.

Commissioner Weissman asked whether the resumes of the new hires are available to the public. General Counsel Stamm replied that the resumes were not public. Commissioner Weissman stated that generally, under FOIL, employees' resumes are available once hired. General Counsel Stamm replied that at JCOPE, resumes have never been made publicly available. JCOPE is not subject to FOIL and resumes are not one of the items delineated in §94 that is to be made publicly available. General Counsel Stamm indicated that she would consult Bob Freeman about whether resumes are generally subject to FOIL. Some agencies make bios available but there may be reasons not to publicize employees' resumes, which may contain personal identifying information. Commissioner Weissman stated that such information could be redacted and offered to send her case law and the Freeman opinion in this matter.

Commissioner Weissman stated after the last meeting he had the opportunity to go through the resumes and noted that the three new hires are people who worked together in the Attorney General's office before 2011 and he sees a pattern of hiring that may not have gone through a formal process. He stated he doesn't believe in coincidences.

III. REPORT FROM STAFF

2016-17 Budget

General Counsel Stamm stated that JCOPE needs to submit its budget request to the Division of Budget on October 16th. Steve Boland, JCOPE's Director of Administration, is already preparing JCOPE's submission. Any Commissioners who want to be involved in the process should let her know. Due to his past budget experience with the State,

Chair Horwitz asked Commissioner Weissman if he would be willing to work with staff on the submission.

Commissioner Jacob asked General Counsel Stamm if the budget increases or decreases the staffing level. General Counsel Stamm explained that the Division of Budget requests that agencies submit requests for a flat budget with no increase. JCOPE received a substantial increase last year of \$1.2 million dollars which, pursuant to JCOPE's staffing and spending plan, would allow JCOPE to fill eleven new positions. If all of those positions are filled, it may be a sufficient staffing level.

New Electronic Filing System for Financial Disclosure Statements

General Counsel Stamm provided an update related to the redesign of the Financial Disclosure Statement online filing system, which has been ongoing for eighteen months. General Counsel Stamm thanked Martin Levine, Director of Lobbying and Financial Disclosure Compliance and Senior Counsel and his staff, Jen Mizener, and other people involved from ITS. The new system will make it easier for people to file their Financial Disclosure Statements and for JCOPE to process filings and regulate compliance. The new system is expected to be online in the next week or so. The first group that is going to be using the new system are the academics who file in November.

JCOPE is also engaged in a redesign of its lobbying filing system. The process is just beginning but the goal is to redesign the system and roll it out by the end of 2016. General Counsel Stamm pointed out that the redesign will address many of the problems in the current system. It will improve the filer experience as well as improve the public's experience in viewing and searching the system. It will also improve JCOPE's processing of filings and automate some of the compliance work that staff now does manually. Commissioner Weissman asked about testing as part of the development of the new system, and General Counsel Stamm explained that testing is part of the redesign process.

General Counsel Stamm also announced that the lobbying data filed from January through June of this year should be posted to the website within the next week or two.

Commissioner Covello asked if JCOPE obtained any software or hardware used to mine the data collected by the Moreland Commission which could be used in the Commission's daily functions. General Counsel Stamm stated her understanding that the Moreland Commission had hired a consultant to analyze the data it collected and that the US Attorney's Office took possession of all of the data and files.

IV. SEARCH FOR EXECUTIVE DIRECTOR

Chair Horwitz provided an update on the search for the Executive Director. As discussed at the last meeting, a committee was formed to assist with the search and make non-binding recommendations to the full Commission. Chair Horwitz thanked Commissioners Jacob, Koretz, Rath, and Rozen for serving on the committee. The committee met last month and a meeting is scheduled for this coming Friday, October 9th. As discussed, the committee is anticipating a nationwide search and posting the position on JCOPE's website, and other similar sites, as well as relevant newspapers. The Search Committee is considering whether to retain a professional search firm and will take these matters up this coming Friday.

Commissioner Smalls asked if there is anything precluding them from posting the position on the JCOPE website. Chair Horwitz said the Committee made a decision to consider all of these issues together and the posting should be available soon after the Committee meets on Friday.

V. REGULATIONS

Proposed Regulations for an Exemption from Publicly Disclosing Client Information in Financial Disclosure Statements

General Counsel Stamm introduced draft regulations that staff prepared that would provide for a process for the Commission to receive and consider applications for exemptions from the three client disclosure provisions in the Annual Financial Disclosure Statements. General Counsel Stamm explained that if the Commission votes to begin a

rule making process, the regulations will be submitted under the State Administrative Procedure Act to be published in the State Register. There would be a 45-day public comment period and then the regulations would be brought back before the Commission to consider the public comments and potential revisions. If the changes are not substantial, the regulations can be finalized, but if there are material changes, the regulations would go out for another public comment period. The new client disclosure requirements become effective on December 31, 2015 so the goal is to have this process in place by the beginning of the new year.

John Harford, the Director of Ethics and Lobbying Guidance, provided an overview of the changes related to client disclosure in the budget bill and the process proposed for seeking exemptions. Director Harford made a presentation describing the changes to Public Officers Law §73-a related to the circumstances under which client information must be disclosed by filers, as well as the amount of information that must be disclosed.

General Counsel Stamm explained that there are statutory exclusions for certain types of services, such as criminal proceedings, bankruptcy and other services, that are built into the revised disclosure requirements. This exemption process covered by the regulations is for services that do not fit under one of those statutory exclusions. The law provides factors for the Commission to consider and a balancing test between the public's interest in the information and any potential harm that may occur from disclosing the identity of any client. The statute provides a process provided for seeking an exemption from either the Office of Court Administration ("OCA") or JCOPE. In developing these regulations, staff has been in communication with both OCA and the Legislative Ethics Commission.

General Counsel Stamm stated that it is anticipated that filers are going to apply for exemptions prospectively. The client disclosure requirements go into effect on December 31, 2015, which means they will be in effect for all of 2016. The FDS filings that require that information will not be due and submitted to JCOPE until May 2017, but over the course of 2016, clients will be making decisions about retaining lawyers so filers will want to know whether they are going to get an exemption. Therefore, JCOPE wants to be

ready as of January 1. OCA is reviewing a draft of the proposed regulations and developing its process, which it anticipates having in place by January 1.

Commissioner Weissman stated it would be helpful, given the number of lawyers sitting on this Commission in private practice, to discuss who these regulations cover because it is going to affect how they deal with clients. General Counsel Stamm stated the regulations cover everyone who files a Financial Disclosure Statement, but will be most relevant to attorneys who have outside practices. However, the client disclosures are not limited to lawyers. General Counsel Stamm opined that it will have the biggest impact on unpaid or per diem Commissioners who have jobs aside from their public sector positions, as well as the legislative members who have positions in the private sector.

Commissioner Weissman asked who is going to approve the exemptions. General Counsel Stamm explained that the regulations provide for the Commissioners to make the determination. The prior delegation of authority that has been discussed at length in this meeting does not include these particular exemptions. Other FDS exemptions previously have been delegated to staff. General Counsel Stamm stated that is an issue the Commission may consider in the future but is not necessary to decide in terms of going forward with the regulatory process today. The authority is not delegated to staff unless and until the Commissioners do so.

Commissioner Weissman asked about the process for seeking an exemption. General Counsel Stamm said it is her understanding that if the Commission grants the exemption, then the client information that otherwise would be publicly disclosed, would not be publicly disclosed. Commissioner Weissman asked, hypothetically, if he were to ask for an exemption in February and it is granted, does he have to actually put that on his FDS and then JCOPE will redact it? General Counsel Stamm replied that under the statute it is an exemption from public disclosure, so the regulations were drafted to work the same way that JCOPE handles certain applications for redactions now: people apply to the Commission requesting that the information they provide to JCOPE on their FDS will not be publicly disclosed. Commissioner Weissman said he is not sure the statute reads that

way but others may want to comment on that. General Counsel Stamm stated that the regulations are definitely drafted as she explained, but the interpretation of the statute is an issue for the Commission to discuss.

Commissioner Jacob stated he is wondering whether they have thought about the appearance of JCOPE Commissioners and staff applying to JCOPE as opposed to the OCA. While it is not prohibited by statute, given that JCOPE is an ethics agency, and the appearance of conflict, it may make sense for Commissioners to go to OCA. General Counsel Stamm stated that is something else the Commission should consider, noting that other types of exemption requests exist that are exclusively within JCOPE's purview to grant and, historically, Commissioners have applied to staff for those exemptions.

Commissioner Jacob asked what other exemptions she is referring to. General Counsel Stamm referenced Executive Law §94(9)(h) and (i), which provides that any filer can request an exemption or redaction if they can establish that the information has no material bearing on the discharge of the reporting person's official duties. JCOPE staff routinely receives and processes these requests from filers. Commissioner Jacob stated that he was speaking about the lawyers that serve as Commissioners for JCOPE and that he thinks, from an appearance standpoint, it makes sense for the lawyers to go to OCA if they are sitting on this Commission.

Chair Horwitz asked General Counsel Stamm to report on the results of the conversations with the Legislative Ethics Commission and others. General Counsel Stamm stated that staff has been in communication with staff at the LEC and OCA for months about developing this process and whether they anticipate that people would apply prospectively. Staff shared a version of JCOPE's draft regulations with staff of the LEC last week who gave JCOPE some initial minor comments, then JCOPE prepared a revised version that they shared with the full Commission, the LEC, and the OCA. General Counsel Stamm heard back yesterday from the LEC staff who indicated that they have some concerns about statutory interpretation but would not be able to prepare a formal response yet. General Counsel Stamm relayed that OCA's initial view is that the

regulations seem to be appropriate and reasonable, but she is expecting to have additional conversations.

Chair Horwitz asked whether Commissioners wanted to move forward with these regulations and begin the SAPA process or wait until the next meeting for more input from the LEC and OCA. Commissioner Koretz stated they should wait and try to coordinate with the LEC and OCA. Commissioner Weissman agreed and stated he would probably have more questions. Commissioner Covello stated that he is concerned about the ramification of these provisions for all the Commissioners who volunteer and also represent clients, whose business will be directly affected, and would like to have more time to review the regulations. Chair Horwitz stated that the legislature and the Governor are now requiring much more specific disclosure about who does business with people who work in government. Chair Horwitz stated that JCOPE's hands are tied because the statute requires the disclosures. Commissioner Covello stated that JCOPE should not make the regulations broader than necessary.

Commissioner Smalls asked about the process of revising the regulations, incorporating Commissioners comments, including her own, and distributing this information to the full Commission. Commissioner Roth expressed interest in the comments that have been received. Chair Horwitz stated that staff will communicate this information when it distributes the next iteration of the regulations to the Commission for discussion at the October 27th meeting.

VI. NEW AND OTHER BUSINESS

There was no new or other business discussed.

VII. MOTION TO ENTER INTO EXECUTIVE SESSION PURSUANT TO EXECUTIVE LAW §94(19)(b)

A motion was made by Commissioner Arroyo, which was seconded by Commissioner Covello, to enter into Executive Session pursuant to Executive Law §94(19)(b). The motion was approved by unanimous vote.

VIII. PUBLIC ANNOUNCEMENT OF ACTIONS FROM EXECUTIVE SESSION

Chair Horwitz announced that, during the Executive Session, the Commission considered and granted three applications for exemption under Public Officer's Law §73-8(b). The Commission approved four settlement agreements and considered a number of investigative matters. The Commission also agreed to adopt a targeted Amnesty Program in order to promote disclosure and increase compliance by encouraging those lobbyists and clients who are currently delinquent to file so the public has the transparency that the lobbying disclosure laws require.

IX. MOTION TO ADJOURN THE PUBLIC MEETING

A motion was made by Commissioner Arroyo, which was seconded by Commissioner Koretz, to adjourn the Public Meeting. The motion was approved by unanimous vote of those Commissioners present.