



New York State Commission on
Ethics and Lobbying in Government
540 Broadway
Albany, New York 12207

COMPLAINT

The Commission on Ethics and Lobbying in Government has jurisdiction to investigate potential violations of Public Officers Law § 73, § 73-a, § 74, Civil Service Law § 107, and Legislative Law article 1-A as they apply to State legislators, candidates for the Legislature and legislative employees, as well as the four statewide elected officials, candidates for those offices, executive branch employees, certain political party chairs, and lobbyists and their clients.

COMPLAINANT NAME Elena R. SASSONE ^{Director} ~~Center for~~
ADDRESS Box 8101 ^{Judicial}
CITY, STATE, ZIP White Plains, NY 10602 ^{Accountability, Inc.}
TELEPHONE 914-421-1200
EMAIL elena@judgewatch.org

Please provide a statement or description of the alleged violation of Public Officers Law § 73, § 73-a, § 74, Civil Service Law § 107, or Legislative Law article 1-A including facts constituting a violation of the law(s) above, the identity of the individual(s) at issue, the agency where the individual(s) work, and, if possible, a date, time, place of the alleged violation. Also note any documents or exhibits you are including to support the allegations.

see attached September 25, 2025
written testimony constituting a
conflict of interest/corruption complaint
against
① NYS Assemblyman Zohran Mamdani &
② NYS Senator Brad Hoylman-Sigal
+ additionally against COELIS's
Commissioners, Executive Director,
General Counsel, & other high ranking staff for
"substantial neglect of duty" & "misconduct
in office"

Has this matter been referred to any other agency?

☐

Yes

☒

No

If yes, which agency? _____

Is there pending legal action you are aware of?

☒

Yes

☐

No

If yes, where? _____

CWA, NCOPE, et al.
Court of Appeals -
upcoming motion for leave to appeal
transferred cert/certificate



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Complaint Additional Page

This complaint form +
attached September 25, 2025
testimony/complaint with
substantiating hyperlinks
& exhibits
are affirmed as true
under penalties of perjury
pursuant to CPLR 2106

Stacy R. Dawson
September 25, 2025
White Plains, New York