

Via email: [redacted]

CONFIDENTIAL

April 23, 2018

LETTER OF ADMONITION

[redacted]

Re: BOE Case No.: 17044.C [redacted]

Dear [redacted]:

On April 18, 2018, pursuant to Board Rule 4-1(B)(3), the Board met with you and your client, [a full-time City employee], and reviewed the entire record before it, including the documents submitted by your client.

The issues the Board considered were whether [your client] had an interest in City business in 2015, 2016, and 2017, in violation of the Governmental Ethics Ordinance's Interest in City Business provision, §2-156-110.

DETERMINATION:

After deliberating, the Board voted 5-0 to determine that [your client] violated the Ordinance in 2015, 2016, and 2017, by working as an independent contractor for [an Aldermanic office] under a City contract in which she had an ownership interest that was worth more than \$1,000 per year while she was a full-time City employee. However, the Board also considered the totality of the circumstances in this case and determined it was a minor violation, under Board Rule 3-11.

In determining whether a violation is minor, the Board considers: (1) whether determining that the violation is minor still upholds the spirit of the Ordinance; (2) whether a third party would view the violation as technical; and (3) whether there was a pattern demonstrating a negligent disregard of the Ordinance. *See*, Case Nos. 14006.A; 16040.C. Pursuant to Board Rule 4-1(C)(iv), the Board voted to issue [your client] this confidential letter of admonition for her minor violation.

ADMONISHMENT:

Accordingly, the Board hereby admonishes [your client] that the Ordinance prohibits her from entering into any contracts with the City in which she has an ownership interest worth more than \$1,000 per year, while she is a City employee (this \$1,000 per year limit would include independent contracts with an alderman, paid with City funds, and would include all City contracts at one time in the aggregate).

Please be further advised that a repeated minor violation of this type would not be considered a minor violation and would be treated more seriously, per §2-156-070(b).

If you or [your client] have any questions, please contact [our office].

Sincerely,

William F. Conlon
Board of Ethics, Chair