

Executive Director's Report September 15, 2025

Board Members

Norma Manjarrez's term expired on July 31; pursuant to the Ordinance, Board members whose terms are expired continue to serve until their successor is appointed and qualifies. I urge Mayor Johnson to reappoint Norma and appoint a Chair as soon as possible.

Amended Rules & Regulations

After a formal rulemaking procedure, the Board amended Rules and Regulations became effective on August 22, 2025. They are posted here: <https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/Rules-Reg-2014.pdf>

Amended Personnel Rules

The Board continues to work with the Department of Human Resources to revise Personnel Rule XXIX, entitled "Conflict of Interest." The current version is dated from 2014 and contains obsolete references that the Board has recommended be removed. We submitted updates to that Rule that coincide with the various provisions of the Governmental Ethics Ordinance to which the Personnel Rules refer.

Amendments to the City's Ethics Laws

On January 24, 2024, The Board's proposals were submitted to the full City Council through the Chair of the City Council's Committee on Ethics and Government Oversight, 47th Ward Ald. Matt Martin. They were designated O2024-0007359, and are posted on the City Clerk's website here:

<https://occpdprodstoragev1.blob.core.usgovcloudapi.net/matterattachmentspublic/78f11f46-552f-4b49-b357-cdb7b2f130ec.pdf>.

We are informed by Ald. Martin's staff that there are no current plans to hold a committee hearing on these proposed amendments. We are unsure of the reasons. This is most disappointing; we believe these amendments are timely and important. We will continue to work toward their passage, and garner support among City Council members and the Administration. If enacted, they would: i) impose tighter regulations with respect to City Council independent contractors; ii) address the use of City property (such as Chicago Police or Fire Department insignia, badges, personnel uniforms, or equipment) in electioneering communications, and, among other things, subject political fundraising committees to the Ordinance's restrictions, thereby granting the Board and Inspector General ("IG") jurisdiction over such committees in this respect; iii) address electioneering communications sent to City employees or officials, and imposed a "stand by your ad" requirement such that candidates for City office must certify that they have reviewed all electioneering communications disseminated by their authorized political fundraising committees; iv) clarify the political activity prohibitions; and v) close a gap in the City's campaign contribution limitations law that allows officers, directors, shareholders, and employees of a person subject to the Ordinance's \$1,500 annual contribution limit to elected officials and candidates to contribute on top of contributions made by the person unless they are reimbursed for that contribution. Our peer cities New York and Los Angeles have already closed an analogous gap in their political contribution laws.

Statements of Financial Interests

There remains just one (1) individual who has not filed a Statement of Financial Interests as required. If and when that individual files, the Board will fine them \$250 per day, and, if the matter cannot be settled, will refer it to the Law Department for collection.

All forms filed in 2018 and after are posted and viewable here, where they stay for seven (7) years after they are filed:

<https://webapps1.chicago.gov/efis/search>

Sister Agencies

We will meet next in late September with our ethics counterparts from the City's sister agencies and related government units: the Cook County Board of Ethics, CTA, CHA, CPS, Chicago Park District, Chicago City Colleges, Metra, and Cook County Assessor.

Education

Mandatory Online Training

To date, 28,100 employees, 32 elected officials, and 245 appointed officials have completed theirs. Their deadline is before January 1, 2026. For lobbyists, the deadline to complete their training was before July 2, 2025. As required by law, on July 3, we sent probable cause notices to 11 lobbyists that they had not completed the training by the deadline, and, on July 17, determined that eight (8) had not provided a valid reason for failing to complete the training, found them in violation of the law, and are fining three (3) of them \$250 per day until they complete it. As required by law, we published their names and violations on our website on July 17.

Mandatory In-person Classes and other presentations

In-person classes began again in May 2024 for those City officials and employees required to attend them once every four years (about 3,600). To date, approximately 3,120 City employees and officials have attended. We held classes in our office on August 13, 14, 20, 21, 27, and 28, and on September 10. We have upcoming classes on September 17, 18, 24, and 25, and on October 1, 2, 8, 9, and 15.

We will also conduct a class on September 17 for personnel from the Civilian Office of Police Accountability (COPA) and a Saturday class for Police Department personnel on October 25. These are all in addition to regularly scheduled classes, the schedule of which is posted here:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/memos/2025%20TRAINING%20SCH.pdf>.

Advisory Opinions

Since the Board's July meeting, we have issued 269 informal advisory opinions. The leading categories for informal opinions were, in descending order: Travel; Gifts; Campaign Financing; Post-employment; Political activity; Outside employment; City Property; and Conflicts of interest.

The leading City departments from which requesters came in this period were, in descending order: Chicago Police Department/Civilian Office of Police Accountability (COPA)/Community Commission for Public Safety and Accountability (CCPSA); City Council; Department of Public Health; Mayor's Office; Department of Housing; and Department of Planning & Development.

82% of all inquiries came from City employees or elected officials; the remainder came from lobbyists, attorneys, vendors, or potential lobbyists.

Please note also that we continue to receive complaints from members of the public: since the last Board meeting, we have received nine (9). These are all referred to the appropriate agency: typically, the IG, or a sister agency's IG.

Informal opinions are confidential and not made public, but are logged, kept, and used for training and future advisory purposes. This same practice occurs with our colleagues at the New York City Conflicts of Interest Board, who issue roughly the same number of informal opinions. They form the basis for much of our annual and periodic educational programs. Formal opinions are made public, in full text, with names and other identifying information redacted out. In the past five (5) years, the Board has issued 70 formal opinions.

Summary Index of Formal Advisory Opinions/Text of all Formal Advisory Opinions

The full text of every formal Board opinion issued since 1986 is posted on the Board's website (more than 925), redacted in accordance with the Ordinance's confidentiality provisions, here:

https://www.chicago.gov/city/en/depts/ethics/auto_generated/reg_archives.html.

Redacted formal opinions are posted once issued or approved by the Board. Summaries and keywords for each of these opinions—and a link to each opinion's text, which we added since the August Board meeting—are available on the Board's searchable index of opinions, here:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/Publications/AOindex.docx>.

A few other ethics agencies have comparable research tools. We are unaware of jurisdictions that make their *informal* opinions public — though, like us, others issue them confidentially and enable requesters to rely on them in the event of an investigation or enforcement.

Lobbyists Filings

783 individuals are currently registered with our office to lobby City employees/officials. We have collected \$353,100 in 2025 lobbyist registration fees. On August 7, we posted a current list of registered lobbyists and their clients here: <https://www.chicago.gov/content/dam/city/depts/ethics/general/LobbyistStuff/LISTS/lobbyistlist.xls> .

Lobbyists' filings dating back to 2014 can be examined here: https://webapps1.chicago.gov/elf/public_search.html.

Second Quarter 2025 lobbying activity reports were due before July 22, 2025. We sent out repeated reminders to all lobbyists of this deadline. On July 24, as required by law, we notified 11 lobbyists that they needed to file their reports before August 8, or they would be found to have violated the Ordinance and fined \$250. As of August 8, seven (7) still hadn't filed and were found in violation of the law and fined accordingly. We made their names and fines public.

Third Quarter lobbying activity reports are due before October 21, 2025. We will send out regular email reminders beginning on September 30.

Note that the Ordinance provides fines of \$250 per day for late filings, and these are capped at \$20,000. By contrast, fines are \$1,000 per day for any individual who has reached either the quarterly hourly or compensation/expenditure threshold that triggers the requirement to register as a lobbyist but then fails to register as required within five (5) City business days of reaching that threshold. These fines begin on the sixth City business day until the person registers. These fines are not capped.

Waivers

Since July 1, 2013, the Board has had authority to grant waivers from certain provisions in the Ethics Ordinance. The Board has granted eleven (11) and denied three (3) waiver requests. In accordance with the law, all granted waivers are posted here: https://www.chicago.gov/city/en/depts/ethics/supp_info/Waivers.html.

Summary Index of Board-Initiated Regulatory Actions/Adjudications/pre-2013 Investigations

We post a summary index of all investigations, enforcement and regulatory actions undertaken by the Board since its inception in 1986 (other than those for violations of filing or training requirements or campaign financing matters). It includes an ongoing summary of all regulatory actions the Board undertook without an IG investigation, based on probable cause findings the Board makes as a result of its review of publicly available information, where no factual investigation by the IG is necessary. *See*

<https://www.chicago.gov/content/dam/city/depts/ethics/general/EnforcementMatters/Invest-Index.pdf>

There are two (2) such matters currently pending, Case Nos. 25011.C and 25018.C. Both are on today's agenda. The former matter is before the Board for a meeting with the subject after the Board found probable cause at its August 2011 meeting. It involves a referral from a Special Assistant Corporation Counsel/Inspector General, which requested that the Board adjudicate the case, which involves an individual who may have violated §2-156-070(a), entitled "Use or disclosure of confidential information." The individual responded through counsel. In Case No. 25018.C, the Board received a referral of a matter involving a City elected official who, the information presented to the Board shows, apparently used the City seal as well as other City property at a political fundraising event, in apparent violation of §§2-156-050, -060- and -135(b). At its August meeting, the Board voted to notify the official that they had 10 days to respond. The official responded, and the matter is before the Board at today's meeting a probable cause finding, a potential finding of a minor violation, or a dismissal.

The Board makes public the names of all violators and penalties it assesses when authorized by law to do so. But only in those that occurred after July 1, 2013, can the Board release the names of those found to have violated the Ordinance. Since July 1, 2013, there have been 92 such matters.

Summary Index of Ongoing/Past IG/LIG Investigations/Adjudications

There are currently nine (9) completed IG ethics investigations in various stages of the adjudicative process. More information on these cases is posted here:

<https://www.chicago.gov/city/en/depts/ethics/provdrs/reg/svcs/ongoing-summary-of-enforcement-matters.html>.

In the first, 23045.IG, a confidential hearing concluded earlier this year, and Administrative Law Judge ("ALJ") Frank

Lombardo issued his Confidential Final Report and Recommendations to the Board on May 15. The Board issued its final opinion on June 17, dismissing the matter. Then, on July 9, 2025, Respondent filed a Request for Attorney's Fees, pursuant to §2-156-392(c). That section provides:

"Upon a final determination by the board that the respondent did not commit a violation of this chapter, the respondent may submit a request to the board seeking reimbursement of reasonable legal expenses and costs incurred in defending the alleged violation. The request for reimbursement shall be granted if the board determines, using established legal principles, that the statement of charges was submitted and pursued in bad faith. If the board determines that the statement of charges was submitted and pursued in bad faith as provided in this section, such finding shall be made publicly available."

The Board voted at its July 2025 meeting to give the City 60 days, until September 12, to respond to the Fee Request. This matter is on today's agenda, as the Law Department has requested that the Board stay its consideration and decision with respect to the Fee Request until it resolves Case No. 25014.C, filed on July 21, 2025. Resolution of that matter will inform the Board's consideration and decision with respect to the Fee Request. The subject filed a written objection to the Law Department's request.

In the second and third, 23054.IG and 23055.IG, the Board found probable cause at its November 2023 meeting. The Board met in February with the subject's attorney. After that meeting, the Board requested further clarification from the IG, received that clarification, and presented it to the subject's counsel. The Board found 12 violations in 23054.IG and voted to pursue a \$60,000 fine (at its April 2024 meeting). In 23055.IG, at its May 2024 meeting the Board found two (2) violations and voted to pursue the maximum penalty of \$5,000 per violation. The subject made offers to settle both matters, which the Board rejected. At its June meeting, the Board voted to proceed with a confidential administrative hearing on both matters. The City is represented by Anthony Masciopinto, from the firm of Kulwin, Masciopinto and Kulwin. ALJ Lombardo is assigned to both matters.

In the fourth, 24003.IG, the IG delivered its completed investigation to the Board on February 2, 2024. The matter involves an investigation into the deletion of comments from an elected official's official social media account. The Board requested and received clarification from the IG on certain factual issues; at its May 2024 meeting the Board voted to seek further clarification from the IG based on the factors set out by the U.S. Supreme Court in *Lindke v. Freed*: https://www.supremecourt.gov/opinions/23pdf/22-611_ap6c.pdf. The IG responded, and the matter has been continued, pending guidance from the federal courts regarding the interpretation of *Lindke*.

In the fifth, Case No. 24025.IG, the IG delivered a completed investigation to the Board on December 2, 2024. The IG concluded that a City official misused their City title and authority in a dispute with a private business. The Board voted to refer the matter back to the IG for further investigation. The IG responded on April 8, 2025. The Board found probable cause at its May 2025 meeting. The subject and their attorney will meet with the Board at today's meeting to attempt to rebut the finding.

In the sixth, Case No. 25013.IG, the IG delivered a completed investigation to the Board on July 18, 2025, with a request that the Board find probable cause. It involves a now-former appointed City official who, the IG found, made comments amounting to sexual harassment in November 2023, in apparent violation of §2-156-149, which prohibits City appointed and elected officials from engaging sexual harassment (as defined), whether by action or inaction. The matter is on today's agenda for a probable cause finding. The Board found probable cause at its August 2025 meeting. The subject intends to meet with the Board at its October meeting to attempt to rebut the finding.

In the seventh, Case No. 25017.IG, the IG delivered a completed investigation to the Board on July 28, 2025, with a request that the Board find probable cause. It involves a City employee who, the IG found, used their City position, City title, and City emails and office equipment for their outside business which they own, including directly communicating with other City employees over City email to secure City permits, in violation of §§2-156-060 and -090(a) of the Ordinance. The Board found probable cause at its August 2025 meeting. The subject can meet with the Board at its October meeting to attempt to rebut the finding.

In the eighth, Case No. 25020.IG, the IG delivered a completed investigation to the Board on August 19, 2025, with a request that the Board find probable cause. It involves a now-former City employee who, the IG found, failed to disclose

on Statements of Financial Interests filed with the Board in 2020 and 2021, real estate they owned in the City in which they had a financial interest, as required. The matter is on today's agenda for a probable cause finding. Should the Board find probable cause, the subject can meet with the Board at its October or November meeting to attempt to rebut the finding.

In the ninth, Case No. 25021.IG, the IG delivered a completed investigation to the Board on September 10, 2025, with a request that the Board find probable cause. It involves a City employee who, the IG found, failed to disclose income received from a business the employee owned on Statements of Financial Interests filed with the Board in 2022, 2023, and 2024, as well as gifts received with a value in excess of \$250 on their 2022 Statement, as required. The matter will be presented to the Board for a probable cause finding at its October 2025 meeting.

Please note that, since the Board's August 2025 meeting, four (4) cases have been settled:

1) In Case No. 23067.IG.02, the Law Department settled the matter for a \$10,000 fine for the subject's failure to report ethics law violations to the IG, which is the same amount the Board had assessed. The Settlement Agreement is posted here:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/Whiteley%2023067.02.IG.pdf>

2) In Case No. 24020.IG, the Law Department settled the matter for a \$3,500 fine for various failures to disclose required information on filed Statements of Financial Interests; the Board had assessed a \$12,000 fine. The Settlement Agreement is posted here:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/Doyle%2024020.IG.pdf>

3) In Case No. 24027.IG, the Board settled the matter for a \$50,000 fine for a violation of the financial interest in City business prohibition; the Board had originally assessed a \$69,000 fine. The Settlement Agreement is posted here:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/24027IG-Inzerra-2025.08.13.pdf>

4) In Case 25006.IG, the Board settled the matter for a \$6,000 fine, which is the amount the Board has assessed for violations of the post-employment provisions. The Settlement Agreement is posted here:

https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/Wickert_Jimenez%2025006.IG.pdf

More complete summaries of these and all IG cases are available on our website, subject to the Ordinance's confidentiality requirements. We post on our website and continually update an ongoing investigative record showing the status of every completed investigation brought to the Board by both the IG since July 1, 2013, and the former Office of the Legislative Inspector General ("LIG"), since January 1, 2012, and the status of all 50 petitions to commence investigations presented to the Board by the LIG. We update this record as appropriate, consistent with the Ordinance's confidentiality provisions. See <https://www.chicago.gov/city/en/depts/ethics/provdrs/reg/svcs/ongoing-summary-of-enforcement-matters.html> and <https://www.chicago.gov/content/dam/city/depts/ethics/general/EnforcementMatters/PulbicScorecard.pdf>

Whenever the IG presents the Board with a completed ethics investigation in which the IG believes there have been violations of the Governmental Ethics Ordinance, the procedure that follows is governed by §2-156-385 of the Ordinance: the Board reviews the IG's report, recommendations, and the entirety of the evidence submitted in its completed investigation, including a review to ensure that the IG conformed with the requirement that it complete ethics investigations within two (2) years of commencing them (unless there is evidence that the subject took affirmative action to conceal evidence or delay the investigation), and that the ethics investigation was commenced within five (5) years of the last alleged act of misconduct.

If the Board finds that the evidence presented warrants a finding of probable cause to believe the subject violated the Ordinance, it notifies the subject of the allegations and affords the subject the opportunity to present written submissions and meet with the Board, together with an attorney or other representative present. The Ordinance provides that this meeting is confidential and *ex parte* – no one from the City's Law Department or IG is present. Note that the Board may also request clarification from the IG as to any evidence found in its investigation before making a probable cause finding or refer the matter back to the IG for further investigation (and has done so). The Board cannot administer oaths at this meeting but can and does assess the subject's credibility and the validity and weight of any evidence the subject provides.

If the subject does not rebut the Board's probable cause finding, the Board may enter into a public settlement agreement – or may find there was a violation and proceed to a hearing on the merits that is not open to the public. That hearing is held before an administrative law judge (ALJ) appointed by the Department of Administrative Hearings. The City would be represented by the Law Department (or a specially hired Assistant Corporation Counsel for that purpose), and the subject by their attorney. At the conclusion of that hearing, the ALJ submits findings of fact and law to the Board, which can accept or reject them, based solely on the written record of the hearing. The Board will then publicly issue an opinion in which it may find violations of the Ethics Ordinance and impose appropriate fines, or find no violation and dismiss the matter.

These processes are based on specific recommendations of then-Mayor Emanuel's Ethics Reform Task Force in Part II of its 2012 Report—the primary purposes being to: (i) guarantee due process for all those investigated by the IG; (ii) ensure that only the Board of Ethics could make determinations as to whether a person investigated by the IG violated the Ordinance, given the Board's extensive jurisprudence and unique expertise in ethics matters; and (iii) balance due process for those investigated by the IG with an accurate adjudication by the Board and the public's right to know of ethics violations.

On our website, we have a publication describing this process in detail:

<https://www.chicago.gov/content/dam/city/depts/ethics/general/Publications/EnforceProcedures.pdf>

Note: fines range from \$500-\$2,000 per violation for non-lobbying or non-campaign financing violations that occurred before September 29, 2019, and \$1,000-\$5,000 per violation for such violations occurring between September 29, 2019, and September 30, 2022. For violations occurring on or after October 1, 2022, the fine range is between \$500 and \$20,000 per violation, and the Board may also assess a fine equal to any ill-gotten financial gains as a result of any Ordinance violation. Fines for unregistered lobbying violations remain at \$1,000 per day beginning on the fifth day after the individual first engaged in lobbying and continuing until the individual registers as a lobbyist.

Please note, finally, that, in all matters adjudicated or settled on or after July 1, 2013, the Board makes public the names of all violators and penalties assessed, or a complete copy of the settlement agreement. All settlement agreements are posted here: <https://www.chicago.gov/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html>

Disclosures of Past Violations

July 2013 amendments to the Ordinance provide that, when a person seeks advice from the Board about past conduct and discloses to the Board facts leading it to conclude that they committed a past violation of the Ordinance, the Board must determine whether that violation was minor or non-minor. If it is minor, the Board, by law, sends the person a confidential letter of admonition. If it was non-minor, then, under current law, the person is advised that they may self-report to the IG or, if he or she fails to do so within two (2) weeks, the Board must make that report. In 12 matters, the Board has determined that minor violations occurred, and the Board sent confidential letters of admonition, as required by the Ordinance. These letters are posted on the Board's website, with confidential information redacted.

On August 7, another such matter was presented to the Board by a City official who self-reported a potential Ordinance violation. That matter is on today's agenda.

Open Meetings Act/FOIA Challenges

The Board is currently involved in five (5) challenges filed with the Illinois Attorney General's Public Access Counselor ("PAC"), all filed by the same individual. These challenges request:

- (1) A review of the propriety of adjourning into executive session during the Board's September 11, 2023, meeting under the Open Meetings Act ("OMA");
- (2) A review of the propriety of adjourning into executive session during the Board's August 14 and September 11, 2023, meetings under the OMA;
- (3) A review of the Board not producing certain records pursuant to FOIA;

(4) A review of the propriety of the Board's method of taking final action at its April 15, 2024, and May 13, 2024, meetings; and

(5) A review of the Board's proceedings in both Open and Executive Session as to Case No. 24019.Q, at its September 30, 2024, meeting.

The Board has worked with the Law Department and responded to each.

Freedom of Information Act

Since the August 11 Board meeting, the Board has received five (5) FOIA requests.

The first was for a list of all lobbyists and their clients and contact information. The Board sent the requestor a links to this information on our website.

The second was for the Board's organization chart, information about Board members, and information about the Board's responsibilities. The Board sent the requester links to this information on our website.

The third, fourth, and fifth were from the same requester, for: i) all communications between Board members and the Law Department regarding Case No. 23045.IG; ii) all communications between the Executive Director and the Corporation Counsel, First Deputy Corporation Counsel, or the First Deputy Corporation Counsel's Assistant regarding Case No. 23045.IG on September 8 and 9, 2025; and iii) all communications from September 1, 2025 to the present between the Executive Director or Board and First Deputy Corporation Counsel, or the First Deputy Corporation Counsel's Assistant regarding Case No. 23045.IG.

The Board will timely respond to these requests by the deadline, which is before the close of business on September 17, 2025.