

**CITY OF CHICAGO BOARD OF ETHICS**  
**June 11, 2024**

**SUMMARY INDEX OF BOARD-INITIATED INVESTIGATIONS (1986-2012) AND ENFORCEMENT ACTIONS (2012-Present)**

This index summarizes **every** investigation and enforcement action undertaken by the Board of Ethics since its establishment in 1986 (other than full campaign financing investigations, which the Board conducted from 1989 through 2012; but this index **does** include campaign financing enforcement actions commenced *after* that date).

The Board has been a robust investigative and enforcement authority through the years and will continue to commence enforcement actions based on public records that warrant a *prima facie* Board finding of probable cause to conclude that a violation of the City's Governmental Ethics Ordinance (the "Ordinance") has occurred – *where no factual investigation by the Office of Inspector General ("IG") is necessary*. [The purpose of an IG ethics investigation is to enable the Board to consider or make a probable cause finding; where the Board *already* has the facts it needs from public record or other materials presented to the Board, then an IG investigation is unnecessary.]

After a Board finding of probable cause, subjects are afforded an opportunity to present their case to the Board in a confidential meeting and explain why there was no violation. If they are unable to, the Board may make a final determination of a violation, and impose fines as provided in the Ordinance. The subject may then appeal the Board's final determination to the Circuit Court of Cook County on a petition for a writ of *certiorari*.

The Board updates this index regularly.

Please note that:

- ▶ **Before July 1, 2013, all complaints to the Board, as well as all investigations the Board commenced and concluded (whether based on complaints the Board received or commenced on the Board's own initiative) were and must remain confidential.** However, the Board may comment publicly on the disposition of its requests and recommendations based on those investigations and publish summary opinions about them. (See §2-156-400 prior to the date it was amended on July 1, 2013.)
  
- ▶ Since July 1, 2013, the Board no longer has authority to conduct investigations. Instead, the Board makes public: (i) all settlements and final determinations of Ordinance violations (or final determinations of no violation) based on enforcement actions it begins and concludes, including the names of City officials, employees, or lobbyists who have violated the Ordinance (names of those who are determined not to have violated the Ordinance are not made public unless the subject directs the Board to make them public), and the penalties the Board has imposed; and (ii) cases based on investigations conducted by the IG (or, from 2011-2015 the former Legislative Inspector General) where the Board, after considering all the evidence, has made a finding that there were violations of the Government Ethics Ordinance. In these cases, the Board will make public the names of persons found to have violated the Ordinance and the penalties imposed, or a final determination that the Ordinance was not violated (though in cases where there the Board makes a final determination of no violation, the subjects may opt to have their names omitted from the Board's public report), or where the Board has settled the case with the subject. A table summarizing *those* matters is posted on the Board's website, at: <https://www.cityofchicago.org/city/en/depts/ethics/provdrs/reg/svcs/ongoing-summary-of-enforcement-matters.html>

- ▶ From January 1998 through May 2010, the Board had authority to investigate signed and sworn complaints alleging violations of the Ordinance by City Council members, but never had the authority to initiate its own investigations in matters involving City Council members. This table does *not* include complaints against City Council members received that were, by law, referred to the City Council's Committee on Committees, Rules and Ethics. The Board was required to refer complaints it had no authority to investigate to that Committee. This index *does* include Board investigations of signed and sworn complaints alleging ethics violations by City Council members.
- ▶ This index does not include the numerous complaints received by the Board which it referred to other investigative agencies, such as the City's Inspector General.
- ▶ The Board also regularly posts the names and fines it assesses on City personnel or registered lobbyists it determines have violated the Ordinance by failing to complete ethics training, or make required lobbyists' disclosures, as required, or others who have failed to register as lobbyists as required, and of City personnel who have failed to file Statements of Financial Interests as required.

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<b>CASE NUMBER</b>	<b>TOPIC</b>	<b>BRIEF DESCRIPTION OF FACTS AND DISPOSITION</b> <b><u>ONGOING CASES ARE IN GREEN</u></b>
86031.I	<b>Gifts</b>	A Board investigation of gifts received by a high-level Executive Branch employee was terminated, because it showed insufficient evidence from which the Board could conclude that the gifts were given in return for advice or assistance on matters concerning the operation of City business.
86060.I and 87001.I	<b>Post-employment</b>	A Board investigation led to the conclusion that there was no violation or basis for further legal action where a former City employee received a City contract 11 months after leaving City service. The contract was awarded through the competitive bidding process; the former employee had not worked on the contract specifications. The Ordinance in effect at the time allowed former employees to have City contracts 6 months after leaving City service.
87002.I	<b>Gifts</b>	<p>After a Board investigation, the Board recommended that two (2) City employees who had won \$500 in cash prizes through a lottery held at a party hosted by a City contractor return the money. While winning cash gifts/prizes through a lottery hosted by a City contractor is not, <i>per se</i>, a violation of the Ordinance, the Board concluded that it raised a serious appearance of impropriety.</p> <p>Note: a revised version of the Ordinance that became effective two months after this lottery prohibited City contractors or others with business before the City from giving cash in any amount to City employees or officials who may affect the givers' transactions with the City.</p>
87006.I	<b>Prohibited political activities</b>	A Board investigation led to the conclusion that allegations that a City employee coerced a City contractor into advertising in a political newspaper were unsubstantiated.
87009.I	<b>Unauthorized use of City property</b>	A Board investigation led to the conclusion that allegations that two (2) City employees were using City resources to run their private business on City time were unsubstantiated. However, the Board reminded the employees that they were prohibited from having a financial interest in City business or in any City contracts while employed by the City.

<b>87013.I</b>	<b>Fiduciary duty; Conflict of interests</b>	A Board investigation led to the conclusion that there was insufficient evidence to substantiate allegations that a high-level Executive Branch City employee illegally extended concession contracts to individuals to individuals known to him.
<b>87024.I</b>	<b>Prohibited political activities</b>	A Board investigation based on allegations made in a media report led to the conclusion that there was insufficient evidence to substantiate allegations that a City employee was selling tickets to a Mayoral fundraiser while she was on City time.
<b>87041.I</b>	<b>Financial interest in City business</b>	A Board investigation led to the conclusion that there was no evidence to substantiate allegations that a City employee had a financial interest in City business where his ownership of a vendor's stock was, at fair market value, less than 1% of the company's outstanding shares (the shares were registered on the National Securities Exchange).
<b>87042.I</b>	<b>Unauthorized use of City property</b>	A Board investigation led to the conclusion that there was no evidence to substantiate allegations that a City employee answered questions regarding an advertisement for a private business while he was on City time.
<b>87054.I</b>	<b>Gifts</b>	A Board investigation led to the conclusion that offerings by various HMOs of a 50% savings to employees and officials who would enroll in their health plans did not constitute a prohibited gift for purposes of the Ordinance, but, rather, were part of a package of incentives and benefits offered to prospective clients.
<b>87071.I</b>	<b>Unauthorized use of City property</b>	A Board investigation found insufficient evidence to substantiate allegations that a City employee was using City time to conduct union business while he was on City time.
<b>88015.I</b>	<b>Unauthorized use of City property</b>	The Board received a complaint that a City employee was conducting a private business while on City time and referred it to the Office of Municipal Investigations ("OMI") for investigation. After receiving the OMI's investigative report, in which the OMI found that allegations were unfounded, the Board dismissed the matter.
<b>88049.I</b>	<b>Lobbying</b>	Pursuant to a news article questioning the propriety of a sale of City property to a partnership whose lawyer was a state elected official, the Board contacted the official to inquire if his activities on behalf of his

		client were such that he should file a lobbyist registration form with the Board. The official subsequently registered as a lobbyist with the City.
<b>88075.I</b>	<b>Improper Influence Employment of Relatives</b>	The Board received an anonymous complaint that a City employee attempted to influence a City contractor over which he had contract management authority to give work to his wife's business. The matter was referred to the Office of Municipal Investigations which found the allegations unsubstantiated. The Board determined there were no violations of the Ethics Ordinance.
<b>88115.I</b>	<b>No Jurisdiction</b>	The Board received a complaint alleging harassment on the part of a City employee. The matter was referred to the Office of Municipal Investigations ("OMI") as the matter did not involve the Ethics Ordinance.
<b>88120.I</b>	<b>No Jurisdiction</b>	The Board referred a complaint to the Office of Municipal Investigations ("OMI") for investigation; the complaint alleged harassment and unfair work treatment by a supervisor in a City department. After the OMI completed its investigations, it referred its report back to the Board, and recommended that the matter be handled as a union grievance. The Board concurred and dismissed the matter.
<b>88130.I and 88109.I (consolidated cases)</b>	<b>Political Activity</b>	An anonymous complainant alleging that certain City employees coerced others into buying tickets to a fundraiser was initially referred to the Office of Municipal Investigations ("OMI") for investigation. The OMI then referred the investigation to its successor, the Inspector General ("IG"). The IG reported to the Board that its investigation failed to identify any employee who had been coerced into buying tickets. As no foundation for the allegation was found, the Board dismissed the case.
<b>88155.I</b>	<b>Unauthorized use of City property</b>	The Board closed a case involving allegations that a City department head had acted improperly with respect to a City contractor, upon being informed that the department head was under investigation by other agencies.
<b>89140.I</b>	<b>Fiduciary duty Conflict of interests</b>	A Board investigation led to the conclusion that there was insufficient evidence to substantiate allegations that a high-ranking Executive Branch City employee improperly influenced the award of City contracts to a particular outside business.
<b>89089.I</b>	<b>Fiduciary duty Conflict of</b>	A Board investigation led to the conclusion that there was insufficient evidence to substantiate allegations that a high ranking City official derived an improper benefit when he purchased a garage from the City, subsequently resold it to another person, then used his position in City government to get the property

	<b>interests</b>	rezoned.  The Governmental Ethics Ordinance was not in effect when the alleged violations occurred, but, the Board concluded, even if it had been, there was no evidence that the official represented the purchaser of the garage before any City agencies that deal with zoning.
<b>89123.I</b>	<b>Representation; Improper Influence; No Jurisdiction</b>	The Board closed a case involving allegations that a City appointed official had improperly profited from the purchase and re-sale of a City garage, as the contract in question had been entered into before the Ethics Ordinance took effect.
<b>90015.I</b>	<b>Outside Employment; Fiduciary Duty</b>	The Board closed a case involving allegations that a City employee had accepted City pay for two (2) days during which he was working for his outside employer. The employee was no longer employed by the City at the time the Board reviewed the allegations and had made restitution to the City, so the Board did not impose sanctions.
<b>90026.I</b>	<b>Post-employment</b>	A Board investigation substantiated allegations that a former City high ranking employee who was working as a consultant for a real estate investment firm was actually working on a large development project over which the former employee had exercised contract management authority while with the City. The Board determined that the former employee was in violation of the Ordinance's permanent post-employment prohibition and recommended that the City's Law Department take appropriate legal or equitable action against the former employee.
<b>90030.I</b>	<b>Improper Influence; Conflict of Interests</b>	A Board investigation led to the determination that there was insufficient evidence to substantiate an allegation that a City employee who had hired a City contractor to do personal work for him was improperly denying bids to the City because of a dispute arising from the personal contract.
<b>90031.I</b>	<b>Post-employment</b>	A Board investigation revealed no evidence that a former City employee helped her new employer obtain a City contract over which she had exercised contract management authority while she was a City employee.
<b>90032.I</b>	<b>Post-</b>	A Board investigation substantiated allegations that a former employee in the Mayor's Office, who was a

	<b>employment</b>	lawyer, had been personally and substantially involved, while with the City, with companies that his current law firm represented then, and on an ongoing basis, but was not in violation of the Ordinance's post-employment restrictions, as he had no involvement with the companies (clients) while a City employee.
<b>90037.I</b>	<b>Lobbying</b>	A Board investigation led to the conclusion allegations that an individual had failed to register as a lobbyist were unfounded, as the individual's conduct did not amount to lobbying, The investigation uncovered no evidence of an attempt to influence any City legislative or administrative action.
<b>90072.I</b>	<b>Outside employment;  Financial interest in City business</b>	A Board investigation found no evidence to substantiate allegations that a City appointed official, who represented tort clients in actions against the City, was thereby in violation of the Ordinance, as his legal work was wholly unrelated to his official City duties and responsibilities. Further, the Board determined, his interest in his clients' potential recovery against the City did not amount to a financial interest in City business within the intended meaning of that term in the Ordinance.
<b>90085.I</b>	<b>Improper Influence;  Conflict of Interests</b>	The Board referred an investigation to the Office of the Inspector General investigation of allegations that two (2) City employees solicited golf outing expenses from City contractors in exchange for continued City business, but dismissed the matter after the IG's investigation shows that the allegations were unfounded.
<b>91032.I</b>	<b>Prohibited political activities; Unauthorized use of City property</b>	A Board investigation found no evidence substantiating allegations that a City employee used City equipment for his private benefit, engaged in prohibited political activity, coerced fellow employees to join his union, and received kickbacks from a City contractor.
<b>91088.I</b>	<b>Employment of Relatives or Domestic Partners</b>	<p>The Board investigated an anonymous complaint with three (3) allegations: (1) that a supervising City employee promoted his brother the year before; (2) that this supervisor was planning to promote his brother again; and (3) that this supervisor had previously promoted another relative.</p> <p>The Board's investigation found no evidence to substantiate the latter two charges and they were dismissed.</p> <p>However, the Board determined that the supervising employee committed two violations of Ordinance's anti-nepotism provisions by signing both an order that promoted his brother to a new position and signing his brother's salary increase approval form.</p>

		<p>However, the evidence also showed that the supervising employee had attempted to comply with the Ordinance by recusing himself from making any decisions with regard to his brother, and that signing of these documents involved standard departmental procedures.</p> <p>The Board recommended no sanctions in the matter, but it established that City employees must recuse themselves fully from any employment-related decisions involving their relatives.</p>
92011.I	<b>Campaign Financing</b>	A Board investigation found no evidence that managerial employees of a private company coerced subordinate employees of the company into making contributions to the Mayor's political fund. and the Board dismissed the case.
92019.I	<b>Gifts</b>	In preparing a position paper on whether City employees may accept honoraria, the Board investigated. The Board did not reach consensus on the issue, and thus advised that Board staff continue to permit the acceptance of honoraria while also recommending a legislative change that would limit the amount of honoraria.
92023.I	<b>Fiduciary duty; Conflict of interests Minor violations</b>	A Board investigation substantiated allegations that a City employee who made decisions in her City position that minimally affected a City contractor, with which she was also employed, violated the Ordinance. However, the Board did not recommend sanctions, as the nature of the violations was minor.
92028.I	<b>Unauthorized use of City property</b>	A Board investigation showed that allegations that a City employee used his City title to obtain information for political purposes were unsubstantiated. However, the investigation did reveal that the City employee made inquiries outside of the workplace but provided his City telephone number for those who had responsive information. While the Board found no violation, it did conclude that the employee's conduct caused needless confusion.
93002.I	<b>Unauthorized use of City property</b>	A Board investigation substantiated allegations that a City employee violated the unauthorized use of City property and fiduciary duty provisions of the Ordinance by using City letterhead stationery and official City envelopes in communications to his landlord concerning problems in his building. The Board recommended that the subject's department head impose appropriate employment sanctions.
93022.I	<b>Unauthorized</b>	The Board referred a complaint to the Inspector General ("IG") for investigation; the complaint alleged that



	<b>use of City property</b>	a City employee was taking City-owned supplies for use at his private business. The IG's investigation found no facts to support the allegations. The Board found the complaint unsubstantiated and dismissed the case.
<b>93040.I</b>	<b>Conflict of Interests</b>	<p>The Board received a complaint alleging that a City employee who reviewed and approved plans for certain construction contractors doing business with the City had solicited one of the contractors to provide services for his private residence. The complaint further alleged that the services had been provided at below the market rate, and that the City employee had implied to the contractor that did the work that, unless the contractor provided these services at below-market rates, the contractor would have difficulty processing future City permits.</p> <p>The matter was referred to the Inspector General ("IG") in November 1993 for investigation.</p> <p>In August 1996, the IG presented its investigative report. The Board voted to close the matter based upon the investigative report's conclusion that the allegations were unsubstantiated.</p>
<b>94041.I</b>	<b>Financial interest in City business</b>	A Board investigation based on a filed Statement of Financial Interests showed that a City employee had a 25% interest in a partnership that leased real estate to the City for use by a City department, and was in violation of the Ordinance by having a prohibited financial interest in a City contract. The employee was advised to dilute his interest in the partnership, and the Board recommended that his department impose appropriate employment sanctions. The Board also referred the matter to the City's Law Department to address whether the City should discontinue the lease.
<b>95003.I</b>	<b>Campaign financing</b>	A Board investigation found that a contributor to the Mayor's campaign committee, who was then reimbursed by his company for the amount of his contribution, was in violation of the City's Campaign Financing Ordinance, as he had made a pseudonymous contribution. The contributor brought himself into compliance with the Ordinance by paying back his company for its reimbursement of his contribution.
<b>95059.I</b>	<b>Employment of Relatives or Domestic Partners</b>	<p>A Board investigation found evidence to substantiate allegations made in an anonymous complaint that a high-ranking City employee had hired eight (8) of his relatives and awarded departmental subcontracts to his brother's company. Specifically, the evidence showed that the employee recommended that his relatives be hired and then signed their personnel forms. The evidence further showed that he signed off on payment authorization forms for his brother's company, which did work for the department.</p> <p>The Board recommended that the employee's department apply appropriate employment sanctions, which were imposed by the employee's department.</p>

<p><b>97002.I</b></p>	<p><b>Financial interest in City business</b></p> <p><b>Statements of financial interests</b></p>	<p>A Board investigation found evidence to substantiate allegations that a high ranking employee had a financial interest in City business by virtue of his ownership interest in a company that did business with the City, and also failed to disclose this on his annual Statements of Financial Interests over the course of several years, and also had sought but disregarded Board advice on the same topic (the advice was sought several years prior to this case).</p> <p>The Board recommended that the employee's department impose the most severe disciplinary sanctions available, including immediate discharge from his City employment. Charges were filed with a disciplinary board, and the employee was terminated.</p>
<p><b>97003.I</b></p>	<p><b>Financial interest in City business</b></p> <p><b>Statements of financial interests</b></p>	<p>In a companion case to 97002.I, a Board investigation found evidence to substantiate allegations that a high ranking employee had a financial interest in City business by virtue of his ownership interest in a company that did business with the City, and also failed to disclose this on his annual Statements of Financial Interests over the course of several years, and also had sought but disregarded Board advice on the same topic (the advice was sought several years prior to this case).</p> <p>The Board recommended that the employee be terminated immediately from his City employment. Charges were filed with a disciplinary board, and the employee was terminated.</p>
<p><b>98025.01-06.I</b></p>	<p><b>Prohibited political activities; Unauthorized use of City property</b></p>	<p>Upon receiving a complaint that an elected City official and five (5) members of the official's staff were being coerced into doing political work on City time and on City property, and that they were soliciting political contributions from entities doing business with the City, and threatening the entities with negative consequences for failing to contribute, the Board's initial investigation found evidence that criminal conduct had occurred. The Board suspended its investigation and referred the matter to the U.S. Attorney's Office, which, after a thorough investigation in conjunction with other law enforcement agencies, found numerous federal criminal violations and tried the matter in U.S. District Court.</p> <p>Once the criminal case was completed, the Board reopened its investigation into violations of the Governmental Ethics Ordinance. The Board's investigation substantiated allegations that several employees had violated the Ordinance's prohibitions with respect to engaging in political activity while on City compensated time and on City-owned property, and coercing subordinates into engaging in political activity, and the Board recommended employment sanctions (which were implemented) for each such employee, including terminations and suspensions.</p>
<p><b>98058.I</b></p>	<p><b>Employment of</b></p>	<p>A Board investigation found evidence to substantiate allegations that a City supervisor who assigned job duties to his brother and approved his brother's requests to accrue and use compensatory and vacation</p>

	<b>relatives</b>	<p>time, violated the Employment of Relatives section of the Ordinance.</p> <p>The Board did not recommend employment sanctions or discipline, but instead recommended that the employees' City department take immediate corrective action.</p>
<b>99036.I</b>	<b>Post-employment</b>	<p>A Board investigation found evidence to substantiate allegations that a former City employee who took an Executive Director position with a non-profit organization upon leaving City service had violated the Ordinance's post-employment provisions. The investigation revealed that the former City employee had exercised contract management authority during his City service over a contract that the non-profit had with the City. The Board determined that the former City employee had violated both the one (1) year and permanent prohibitions of the Ordinance, he must recuse himself immediately from all work related to the contract in question. The Board also recommended that the Law Department and operating department with the contract determine whether the contract should be voided by the City.</p>
<b>99045.I</b>	<b>Fiduciary duty</b> <b>Unauthorized use of City property</b>	<p>A Board investigation found that allegations that a City employee misused his City position to harass a neighbor by subjecting her to repeated inspections of her property were not sustained.</p> <p>The Board recommended that the City department for which the employee worked track all complaints received from the property in question, especially the source of any future complaints.</p>
<b>99047.I</b>	<b>Fiduciary duty</b> <b>Conflicts of interest</b>	<p>The Board conducted an investigation of a signed and sworn complaint alleging that: (i) an elected official disregarded his fiduciary duty by adding language to a proposed ordinance regarding a real estate development; (ii) a City department head violated his fiduciary duty to the City by informing the employer of a private citizen who had expressed opposition to the project at a public meeting with unfavorable future City action; and (iii) that appointed official had a conflict of interest by asking questions in a public City hearing on the project despite the fact that the developer was represented by a law firm in which the commission chair was a partner.</p> <p>The Board: (i) dismissed the allegation against the elected official, finding that there was no probable cause to conclude that it could be violation of the Ordinance and referred it to the standing committee of the City elected body with jurisdiction to investigate such complaints; (ii) there were insufficient facts to substantiate the allegation against the department head; and (iii) found that the appointed official had indeed participated in the proceeding, but recused himself from the final vote. The Board considered whether to further investigate the nature of the official's fee relationship with the law firm (did the official agree to forego all compensation from this matter?) and the firm's fee relationship with its client (was it a contingent fee?) but voted to exercise its discretion not to pursue the investigation further and instead, directed that the Board issue an advisory opinion discussing what it means to "participate in the making of a governmental decision" within the meaning of the Ordinance's conflict of interests and improper influence provisions, and what constitutes a proper recusal.</p>

		<p>The Board also determined: (i) a City employee or official who sits as a member of a City agency, board or commission and examines a witness at a hearing before that body, then recuses from a vote, but the vote results in a decision or action, has participated in the decision or action, despite recusal; and (ii) a City official who chairs a City board or commission presides over a hearing before the body, but does not examine witness, and recuses from a vote, has also participated in the decision or action. See <i>also</i> Case No. 00008.A, an advisory opinion, listed under Conflicts of Interest and Appointed Officials.</p>
<b>00004.I</b>	<b>Employment of relatives</b>	<p>A Board investigation found insufficient evidence to substantiate allegations that a City employee who served a general foreman, and whose brother worked for the same City department, had violated the Ordinance's Employment of Relatives provisions. The investigation showed that he did not assign his brother daily work tasks, or review his brother's work performance, or play any role in his brother's hiring.</p>
<b>00007.I</b>	<b>Prohibited conduct;  Statements of Financial Interests</b>	<p>The Board investigated a complaint alleging violations of the Ordinance's Prohibited Conduct provisions, which prohibits City employees from receiving loans from certain persons doing business with the City or from lobbyists. The investigation revealed that a City employee had solicited a loan for another employee from a person affiliated with business operating at various City facilities regulated by the loan recipient's City department. However, the investigation found, the loans were solicited and received prior to the time that the recipient became a City employee, hence, the Board determined that there was no violation of the Prohibited Conduct provisions. The investigation further showed that neither employee was involved in regulating the businesses operating at various facilities.</p> <p>The Board also investigated whether the employee who received the loans had violated the Ordinance for failing to disclose them on the annual Statements of Financial Interests, but determined that there had been no violation, since the loans did not originate with a person doing work for or business with the City.</p>
<b>01013.I</b>	<b>Post-Employment</b>	<p>The Board initiated its own investigation into whether a former high-ranking employee who had taken a position as a partner and lobbyist with a law firm upon leaving City service had violated the post-employment provisions of the Ordinance by assisting or representing a firm client in connection with a City contract. At issue was whether, during his City tenure, the former employee had participated personally and substantially in the subject matter of the transaction, exercised contract management authority over the City contract.</p> <p>The Board's investigation revealed no evidence that the former employee had violated either the one-year prohibition or the permanent prohibitions of the Ordinance's post-employment provisions by taking on this work, because, during his employment with the City, he had not participated personally and substantially in the subject matter of transaction at issue, nor had he exercised contract management authority over the contract.</p>

<b>01034.01.LOB</b>	<b>Lobbying contingent fees</b>	The Board informed a lobbyist that it had probable cause to conclude that a portion of a lobbying retainer agreement appeared to violate the prohibition against contingent fees. In response, the lobbyist and client modified the agreement to conform with the Ordinance.
<b>01034.02.LOB</b>	<b>Lobbying agreements</b>	The Board informed a lobbyist that its retainer agreements appeared to be for five (5) clients, and required that the lobbyist provide a written agreement for two (2) clients and provide an oral statement of the substance of the lobbying agreement for the remaining three (3) clients.
<b>01034.03.LOB</b>	<b>Lobbying agreements</b>	The Board informed a lobbyist that its registration required an oral statement of the substance of the lobbying agreement between the lobbyist and the client; the lobbyist provided this.
<b>01034.04.LOB</b>	<b>Lobbying contingent fees</b>	The Board informed a lobbyist that it had probable cause to conclude that a portion of a lobbying retainer agreement appeared violate the prohibition against contingent fees. In response, the lobbyist and client modified the agreement to conform to the Ordinance, and the lobbyist agreed to inform the Board of all compensation it received from this client to ensure these were in accord with the Ordinance.
<b>02002.11.LOB</b>	<b>Lobbying agreements</b>	The Board sought a proper copy or summary of a lobbyist's retainer agreement but closed the matter after the lobbyist informed the Board that its client's project giving rise to the lobbying initiative had been terminated.
<b>02002.12.LOB</b>	<b>Lobbying agreements</b>	The Board required that a lobbyist provide a current written lobbying agreement or a written summary of an oral agreement, not a prior one, and required the lobbyist to state the basis of compensation clearly so as to assure the Board that the arrangement did not constitute a prohibited contingency fee.
<b>03064.I</b>	<b>Post-Employment</b>	The Board investigated an anonymous complaint that one (1) current and two (2) former City employees had violated the Ordinance's post-employment provisions. Following its investigation, the Board determined that one of the former employees had violated the Ordinance by assisting the current City employee in providing services related to the work he during his City employment, within one year of leaving City service.

		<p>The Board requested that the City department confirm in writing that corrective action had been taken to ensure that this assistance was no longer occurring. The Board also recommended that the department issue a written memorandum to all department employees with authority to retain contractors/consultants on behalf of the Department, instructing them of the post-employment restrictions and that the Ordinance provides that any City contract negotiated, entered into or performed in violation of the Ethics Ordinance is voidable as to the City.</p> <p>The Board advised the former employee's department of its authority to void the City contract.</p>
<b>04069.LOB</b>	<b>Lobbying contingent fees</b>	The Board informed a lobbyist that it had probable cause to conclude that a portion of a lobbying retainer agreement appeared to violate the prohibition against contingent fees. In response, the lobbyist and client modified the agreement to conform to the Ordinance, and the lobbyist agreed to inform the Board of all compensation it received from this client to ensure these were in accord with the Ordinance.
<b>05014.LOB</b>	<b>Lobbying contingent fees</b>	The Board found probable cause to conclude that a portion of a lobbying retainer agreement appeared to violate the prohibition against contingent lobbying fees, but, after receiving information from the lobbyist and client, closed the matter and advised the lobbyist of the prohibition against contingent lobbying fees.
<b>05015.LOB</b>	<b>Lobbying contingent fees</b>	The Board found probable cause to conclude that a portion of a lobbying retainer agreement appeared to violate the prohibition against contingent lobbying fees, but after further investigation, the Board determined that the individual did not fall within the Ordinance's definition of lobbying and dismissed the matter.
<b>05018.LOB</b>	<b>Lobbying contingent fees</b>	The Board found probable cause to conclude that a portion of two (2) lobbying retainer agreements violated the prohibition against contingent fees, but closed the matter after the lobbyist provided information showing that it had mistakenly registered for the first clients, and that the other was no longer a client.
<b>05019.LOB</b>	<b>Lobbying contingent fees</b>	The Board found probable cause to conclude that a portion of a lobbying retainer agreement violated the prohibition against contingent fees. In response, the lobbyist and client modified the agreement to conform to the Ordinance, and the Board closed the matter, as no contingent fees had actually been received.
<b>05043.I</b>	<b>Financial Interest in City</b>	The Board investigated an anonymous complaint alleging that a City employee had received monies through the City's Low-Income Housing Trust Fund's Rental Subsidy Program in violation of the Ethics

	<b>business</b>	<p>Ordinance. The Board's investigation revealed that the City employee and his wife, in whose name the program's application was submitted, had received rent subsidy payments for a property they owned in the City.</p> <p>The Board determined that the City employee had a prohibited financial interest in City business, by having an interest that exceeded \$5000 in a rental subsidy agreement with the City's Low-Income Housing Trust Fund, and thus had violated the Ethics Ordinance. However, given specifics of the case, the Board did not recommend termination of the employee's and his spouse's participation in the program for calendar 2006, nor the employee's department impose appropriate disciplinary sanctions, but did recommend substantial changes to the Rental Subsidy Program's application form that would clarify the severe restrictions on the participation of City employees.</p>
<b>05063.I</b>	<b>Fiduciary Duty</b>  <b>Conflict of Interests; Improper Influence</b>  <b>Financial interest in City business</b>  <b>Gifts</b>	<p>The Board investigated a signed and sworn complaint alleging Ethics Ordinance violations in connection with the sale of two (2) real estate parcels to an alderman's Chief of Staff, pursuant to a City program for land conveyancing. The complaint alleged that: both parcels were conveyed to a developer through a City program; both conveyances required City Council approval and support from the alderman; the Chief of Staff worked for the alderman whose approval was required; the Chief of Staff was identified as the alderman's contract person for these parcels; that the terms of the redevelopment agreement between the developer and City governing these conveyances required the developer to perform certain improvements on the properties; that any re-conveyance of the properties required City approval; that the developer had not performed all required improvement and conveyed the property to the Chief of Staff for under their appraised value.</p> <p>After the Board's investigation was completed, it determined that the facts adduced in were insufficient to warrant the conclusion that the Chief of Staff had violated the Ordinance's Fiduciary Duty provision by using City property or resources for a purely personal benefit; that the facts adduced were insufficient to demonstrate that the Chief of Staff had, on behalf of the Developer, obtained the alderman's required support and did not have any economic interest or promise of any economic interest in the properties or developer at the time he obtained that support; that neither had a financial interest in City business given the purchase price from the City; and that there was insufficient evidence to warrant a conclusion that the Chief of Staff had received a prohibited gift.</p> <p>The Board forwarded its investigative report to the Chief of Staff, developer, the alderman, the City department that administered the program and the Law Department, and recommended that the alderman review the Chief of Staff's responsibilities as to this and other land conveyancing programs; that the department that administered the program perform regular property appraisals, and that the department, together with the Law Department, review the terms of the developer's sale to the Chief of Staff to determine whether either sale constituted a breach of the redevelopment agreements between the developer and the City.</p>

<b>06015.LOB</b>	<b>Unregistered lobbying</b>	The Board received a report of potential unregistered lobbying by two individuals, and commenced an investigation, and found that there was probable cause to conclude the individuals had violated the Ordinance. However, further information gathered by the Board showed that the two individuals reported to have contacted a City official had not actually had this contact. The Board dismissed the investigation but advised the individuals of the requirements of the lobbying laws.
<b>06058.I</b>	<b>Statement of Financial Interests</b>	A Board investigation found sufficient evidence to substantiate allegations that a candidate for aldermanic office violated the Campaign Finance Ordinance by failing to submit a Statement of Financial Interests as required by law. Upon being advised of this failure, the candidate submitted the form and the Board voted that in doing so, he was in compliance with the law.
<b>06059.I</b>	<b>Statement of Financial Interests</b>	A Board investigation found sufficient evidence to substantiate allegations that a candidate for aldermanic office violated the Campaign Finance Ordinance by failing to submit a Statement of Financial Interests as required by law. Upon being advised of this failure, the candidate submitted the form and the Board voted that in doing so, he was in compliance with the law.
<b>07016.I</b>	<b>Employment of relatives</b>	<p>A Board investigation found evidence to substantiate allegations that a City employee who was serving as an acting supervisor violated the Ordinance's Employment of Relatives provisions by supervising his spouse while "acting up."</p> <p>The Board recommended that the employee's department pursue appropriate disciplinary sanctions, in accordance with the relevant collective bargaining agreement, and recommended policy changes to the City department so as to prevent violations in the future when employees serve as acting supervisors ("acting up").</p>
<b>07017.I</b>	<b>Ethics training</b>	<p>A complaint was filed with both the Board of Ethics and the IG alleging that a City supervisor had taken the mandatory annual ethics training for five (5) of his employees. The Board and the IG agreed that the IG would investigate the matter.</p> <p>In 2012, the IG confirmed that it had investigated the matter. The Board amended the language on the log-in page of the annual on-line ethics training to remind City personnel clearly that taking ethics training for any other person constitutes a violation of the Ordinance and subjects the individual to fines and termination.</p>



<b>07034.C</b>	<b>Post-employment</b>	The Board received a complaint from a City department alleging that one of its former employees was in violation of the Ordinance's post-employment provisions. The Board reviewed the complaint, but determined that an investigation was not warranted, given that there were not enough facts alleged to indicate reasonable cause to investigate, and instead, in conjunction with the Department, informed the former employee and his employer in writing of the post-employment restrictions and penalties for violating them. Prior to receiving the former employee's and his employer's response, the Board learned that the Inspector General was investigating the former employee and his employer, and then submitted its information to the Inspector General pursuant to a subpoena. The Board decided to suspend any potential investigation pending the outcome of the Inspector General's investigation; that investigation subsequently showed that there had been violations of the Ordinance.
<b>09028.LOB</b>	<b>Unregistered lobbying</b>	The Board found probable cause to conclude that employees of a company had engaged in unregistered lobbying but closed the matter after receiving the firm's response regarding its agents' contacts with City officials, concluding that that contact did not constitute lobbying.
<b>09029.CNS</b>	<b>Conflict of interests</b>	At the Board's request, the Board's Executive Director and staff analyzed news reports that a City Council member had written letters of recommendation to other City employees and officials in support of projects on behalf of clients of the member's outside business. The reports also indicated that the City elected official recused from City Council consideration and voting on the projects. After hearing Board staff's report, the Board concluded that the information available to the Board did not warrant a conclusion that there was a possible violation of the Ethics Ordinance, and noted that the Board's Rules and Regulations did not allow for an investigation of the matter without a signed and sworn complaint, and that the Board was precluded from initiating an investigation into the matter.
<b>10001.LOB</b>	<b>Unregistered lobbying</b>	The Board found probable cause to conclude that an individual had engaged in unregistered lobbying, but the individual rebutted the Board's finding by showing that the organization on whose behalf the individual communicated with City personnel was a not-for-profit corporation, and the individual was a director of the organization. This rendered the question of lobbyist registration moot – "lobbying" as a director of a not-for-profit corporation is an exception to the requirement to register as a lobbyist.
<b>10023.I</b>	<b>Unauthorized use of City property</b>	The Board investigated a signed and sworn complaint alleging that a City Council member was using City property improperly and in an unauthorized manner. The facts adduced in the Board's investigation showed that the official was using the property as authorized. The Board dismissed the matter as

		unsubstantiated.
<b>10050.C.1</b> <b>10050.C.2</b> <b>10051.C.1</b> <b>10051.C.2</b> <b>(consolidated cases)</b>	<b>Unauthorized use of City property</b>  <b>Political activity</b>	<p>After receiving three (3) signed and sworn complaints that a City Council member was: (1) using the City seal on a privately funded website with political content; (2) advertising for a golf outing (a political fundraising event) on a City owned and maintained website; and (3) using his ward office as a campaign office and advising citizens to contact the ward office for campaign related matters, the Board investigated.</p> <p>The investigation showed that, as to the second complaint, the golf outing was not advertised on a City website and therefore there was no violation of the Ethics Ordinance.</p> <p>As to the first and third complaints, the Board advised the elected official to remove the City seal from his privately funded website, remove all political content from his ward office website, and make a concerted effort to advise both campaign workers and constituents that his campaign office is not a City office, and that City business should not be transacted there.</p> <p>In a fourth signed and sworn complaint, the Board's investigation showed that an allegation that another City Council member was using the City seal on his political website had already been addressed by the City's Law Department.</p>
<b>12060.I</b>	<b>Fiduciary duty</b>  <b>Unauthorized use of City property</b>	<p>After receiving a complaint, the Board conducted a full investigation into allegations that a long-time City employee had accessed departmental lists of licensed tradespeople and then photocopied the list without authorization, and that a blog with which he was affiliated then published a story about someone whose name was on that list.</p> <p>The Board's investigation substantiated allegations that the employee violated the Ordinance's fiduciary duty and use of City property provisions by printing the list of licensed tradespeople without authorization and using it for private purposes. The Board recommended that the employee be terminated, and the Department terminated the employee.</p>
<b>17005.LOB</b>	<b>Unregistered lobbying</b>	<p>Based on its examination of records released publicly for the first time, the Board commenced a regulatory action and determined that there was probable cause to conclude that David Plouffe had lobbied City officials on behalf of a company on November 20, 2015, but did not register as a lobbyist on behalf of that company, and that both the lobbyist and the person hiring or retaining him violated the Ordinance's lobbyist registration laws.</p>

		<p>The respondents were unable to rebut the Board's probable cause finding, and the Board made a final determination that both the individual and his lobbying client had violated the Ordinance, and assessed him a \$90,000 fine and his lobbying client a \$2,000 fine (for hiring or retaining an unregistered lobbyist). On April 18, 2017, the fines were paid.</p>
<p><b>17011.01 - .27.LOB</b></p>	<p><b>Unregistered lobbying</b></p> <p><b>Undisclosed lobbying</b></p>	<p>Based on its examination of public records released for the first time, the Board commenced 27 regulatory actions involving potential unregistered and/or unreported lobbying activity.</p> <p>As of July 25, 2017, the status of these cases is as follows:</p> <p>.01: The Board determined that an individual engaged in lobbying in 2011, and failed to register as required, and fine the individual \$1,000, which was the only fine provided in the version of the Ordinance in effect at the time of the lobbying. The Ordinance in effect at the time provided that all Board recommendations and findings must remain confidential.</p> <p>.02: The Board determined there is probable cause to conclude that an individual lobbied on behalf his company without registering. After considering the respondent's written response, the Board vacated its determination of probable cause and dismissed the matter on the basis that this was a sales call only.</p> <p>.03: The Board determined there is no probable cause to conclude that an individual lobbied on behalf of a non-profit entity; available information indicated that the activity was not performed for compensation.</p> <p>.04: The Board determined there is no probable cause to conclude that unregistered lobbying occurred, because the company on whose behalf the apparent lobbying occurred had several registered lobbyists at the time, who reported lobbying activity before the City department involved; it could not be determined whether the possible lobbying activity had been performed by someone other than these registered lobbyists.</p> <p>.05: The Board determined there is probable cause to conclude that an individual lobbied on behalf his company without registering. After considering the respondent's written response, and meeting with the respondent, the Board vacated its probable cause determination and dismissed the matter.</p> <p>.06: The Board determined that Anthony Davis lobbied the Mayor by sending an email on behalf of a business of which he was a patron, requesting a meeting regarding a request for assistance and to meet regarding a zoning change, but then failed to register as required. The Boar fined the respondent \$2,500 and dismissed the case against the company. At its October 2017 meeting, the Board voted to authorize settlement of the matter, whereby the Board would vacate its determination and fine provided the respondent does not engage in unregistered lobbying for one (1) year and complete a lobbyist training program developed by the Board.</p>

		<p>.07: The Board determined there is probable cause to conclude that an individual lobbied on behalf his company without registering. In response, the individual provided written sufficient evidence that actions were taken on behalf of a “one-tier” non-profit, without compensation. The Board vacated its probable cause determination and dismissed the matter.</p> <p>.08: The Board determined that James Abrams lobbied the Mayor by sending an email on behalf of a friend whose company was seeking an exemption from a City ordinance, but then failed to register as required. The Board fined the respondent \$2,500 and dismissed the case against the company. At its October 2017 meeting, the Board voted to authorize settlement of the matter, whereby the Board would vacate its determination and fine provided the respondent does not engage in unregistered lobbying for one (1) year and complete a lobbyist training program developed by the Board.</p> <p>.09: The Board determined there was no probable cause to conclude that an individual had lobbied on behalf of a non-profit entity, and information available to the Board indicated that the activity was not performed for compensation.</p> <p>.10: The Board determined that Alan King lobbied the Mayor by requesting that the Mayor assist in a matter involving the Chicago Park District and Army Corps of Engineers but failed to register as required, and that the request was made on behalf of another person, and was a request for the Mayor to act as Mayor with respect to action by another governmental entity. The Board fined the respondent \$2,500 and dismissed the case against the person on whose behalf the emails were sent. At its October 2017 meeting, the Board voted to authorize settlement of the matter, whereby the Board would vacate its determination and fine provided the respondent does not engage in unregistered lobbying for one (1) year and complete a lobbyist training program developed by the Board.</p> <p>.11: The Board determined there is probable cause to conclude that a registered lobbying engaged in lobbying activity on behalf of a company but failed to report that on the lobbyist’s activity report. After considering the respondent’s response, the Board vacated its probable cause determination and dismissed the matter because the evidence before the Board did not warrant a finding that the respondent’s communications constituted lobbying.</p> <p>.12: The Board determined that Marc Andreessen lobbied on behalf a company without registering, by emailing the Mayor with respect to the direction legislation then-pending before the City Council was taking. The Board fine the respondent \$2,500 and dismissed the case against the company, after hearing from the respondent and the company.</p> <p>.13 The Board determined there is probable cause to conclude that an individual lobbied on behalf a company without registering. After considering the individual’s response, the Board concluded that the individual had not lobbied, vacated its probable cause finding, and dismissed the case.</p>
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<b>17017.CF</b>	<b>Campaign Financing</b>	<p>The Board found probable cause to conclude that a political contributor and the authorized political committee of a City elected official each violated the Ordinance's limitations on campaign or political contributions. By operation of law, any violation would be erased if the amount of the excess contributions is refunded by the committee to that contributor with the specified time. The Board issued notices of probable cause to both the contributor and committee notifying them of the apparent violation and provision and issued a companion advisory opinion in the matter. The respondents exercised their right to request that the Board reconsider its opinion.</p> <p>The parties argued on reconsideration that the contributor was not "seeking to do business" because it would not have an ownership in the actual "bricks and mortar" location at the City facility, but would instead be a licensor/franchisor, and thus did not have a matter involving concession agreements pending before the City Council. The rejected that argument because: (i) the contributor's affiliated businesses were still named in documents submitted to City Council as potential concessionaires; and (ii) for purposes of the campaign financing provisions of the Ordinance, the contributor was still the party-in-interest, like any franchisor, because of the degree of control it would exercise over the licensee and because good will (or bad will) would redound to the contributor, not to the licensee.</p>
<b>17026.CF</b>	<b>Campaign Financing</b>	<p>The Board found probable cause to conclude that a political contributor and the authorized political committee of a City elected official each violated the Ordinance's limitations on campaign or political contributions. By operation of law, any violation would be erased if the amount of the excess contributions is refunded by the committee to that contributor with the specified time. The Board issued notices of probable cause to both the contributor and committee notifying them of the apparent violation.</p> <p>The contributor argued on reconsideration that the contributor was not "seeking to do business" because it would not have an ownership in the actual "bricks and mortar" location at the City facility, but would instead be a licensor/franchisor, and thus did not have a matter involving concession agreements pending before the City Council. The rejected that argument because: (i) the contributor's affiliated businesses</p>

		<p>were still named in documents submitted to City Council as potential concessionaires; and (ii) for purposes of the campaign financing provisions of the Ordinance, the contributor was still the party-in-interest, like any franchisor, because of the degree of control it would exercise over the licensee and because good will (or bad will) would redound to the contributor, not to the licensee.</p> <p>The contributor received appropriate refunds, thus ending the matter.</p>
<b>17027.CF</b>	<b>Campaign Financing</b>	<p>The Board found probable cause to conclude that a political contributor and the authorized political committee of a City elected official each violated the Ordinance's limitations on campaign or political contributions. By operation of law, any violation would be erased if the amount of the excess contributions is refunded by the committee to that contributor with the specified time. The Board issued notices of probable cause to both the contributor and committee notifying them of the apparent violation.</p> <p>The contributor argued on reconsideration that the contributor was not "seeking to do business" because it would not have an ownership in the actual "bricks and mortar" location at the City facility, but would instead be a licensor/franchisor, and thus did not have a matter involving concession agreements pending before the City Council. The rejected that argument because: (i) the contributor's affiliated businesses were still named in documents submitted to City Council as potential concessionaires; and (ii) for purposes of the campaign financing provisions of the Ordinance, the contributor was still the party-in-interest, like any franchisor, because of the degree of control it would exercise over the licensee and because good will (or bad will) would redound to the contributor, not to the licensee.</p> <p>The contributor received appropriate refunds, thus ending the matter.</p>
<b>17030.LOB</b>	<b>Lobbyist disclosure;</b> <b>Lobbyist training</b>	<p>In September 2012, the Board found that a registered lobbyist violated the Ordinance for failing to file a required quarterly activity report, and to complete annual required ethics training as required. It imposed fines and referred these fines for collection. No collection was effected. The lobbyist attempted to re-register as a lobbyist in June 2017, but the Board's electronic lobbyist registration blocked that attempt. At its June 2017 meeting, the Board determined that, to re-register, the individual must pay \$3,500 in fines, which is double the amount of the fine for the training violation and double the minimum amount for the filing violation.</p>
<b>17036.CF</b>	<b>Campaign financing</b>	<p>Based on its review of lobbyists' quarterly activity reports, the Board noticed that a registered lobbyist disclosed political contributions in the calendar quarter in excess of \$1,500 to the political committee of a City elected official, in apparent violation of the Ordinance. The Board notified the lobbyist of the apparent</p>

		violation, and the lobbyist confirmed that its quarterly report was incorrect and that it had mistakenly double-reported this contribution, and that the actual amount contributed was less than \$1,500 to the political committee. The lobbyist corrected its quarterly report, and the Board dismissed the matter.
<b>17037.CF</b>	<b>Campaign financing</b>	Based on its review of lobbyists' quarterly activity reports, the Board noticed that a registered lobbyist disclosed political contributions in the calendar quarter in excess of \$1,500 to the political committee of a City elected official, in apparent violation of the Ordinance. The Board notified the lobbyist of the apparent violation, and the lobbyist confirmed that its quarterly report was incorrect and that it had mistakenly double-reported this contribution, and that the actual amount contributed was less than \$1,500 to the political committee. The lobbyist corrected its quarterly report, and the Board dismissed the matter.
<b>17038.CF</b>	<b>Campaign financing</b>	Based on its review of lobbyists' quarterly activity reports, the Board noticed that a registered lobbyist disclosed political contributions in the calendar quarter in excess of \$1,500 to the political committee of a City elected official, in apparent violation of the Ordinance. The Board notified the lobbyist of the apparent violation, and the lobbyist confirmed that its quarterly report was incorrect and that it had mistakenly double-reported this contribution, and that the actual amount contributed was less than \$1,500 to the political committee. The lobbyist corrected its quarterly report, and the Board dismissed the matter.
<b>17044.C</b>	<b>Financial interest in City business</b>	At its September 2017 meeting, the Board, based on facts presented to it, found probable cause to conclude that a full-time City employee had a prohibited financial interest in a City contract by virtue of entering into contracts with a City Council member as an independent contractor to assist with legislative services related to the operation of the Ward, and has been paid more than \$18,000 for such services, with City money, over several years. After the Board met with the employee and her attorney at its April 2018 Board meeting, the Board determined that the employee committed a minor violation of the Ordinance and sent a private letter of admonition. The Board's determination was based on the facts that the individual terminated her personal services with the alderman as soon as the Board made its probable cause finding, and neither the individual's own City department nor the alderman's office flagged the personal services contract as a problem or contacted the Board for advice. The Board will send out a reminder to all City Council members of this restriction.
<b>17048.CF</b>	<b>Campaign financing</b>	Based on materials presented to it, the Board determined at its October 2017 meeting that there is probable cause to believe that a company doing business with the City and the political committee of a City elected official violated the Ordinance due to an excess political contribution in 2015. The parties were notified of their right to dispute the finding or cure any violation by effecting a refund of the excess amount within 10 days of the notice. The elected official notified the Board that the excess amount of the contribution had in fact been refunded in 2015, though the refund was marked as an expenditure on the official's committee D-2 form filed with the State Board of Elections. After the official informed the Board



		of that fact, the Board closed the case.
<b>17049.CF</b>	<b>Campaign financing</b>	Based on materials presented to it, the Board determined at its October 2017 meeting that there is probable cause to believe that a company doing business with the City and the political committee of a City elected official violated the Ordinance due to an excess political contribution in 2015. The parties were notified of their right to dispute the finding or cure any violation by effecting a refund of the excess amount within 10 days of the notice. The elected official notified the Board that the excess amount of the contribution had in fact been refunded in 2015, though the refund was marked simply in a letter to the Illinois State of Elections and was not notated on the official's committee's D-2. After the official informed the Board of that fact, the Board closed the case.
<b>17050.CF</b>	<b>Campaign financing</b>	Based on materials presented to it, the Board determined at its October 2017 meeting that there is probable cause to believe that a company doing business with the City and the political committee of a City elected official violated the Ordinance due to an excess political contribution in 2015. The parties were notified of their right to dispute the finding or cure any violation by effecting a refund of the excess amount within 10 days of the notice, and the refund was effected. The Board thus closed the case.
<b>18002.C</b>	<b>Representation of other persons;</b> <b>Use of City property;</b> <b>Fiduciary duty</b>	Based on materials presented to it, the Board determined at its January 2018 meeting that there is probable cause to believe that elected City official violated the City property, representation of other persons and fiduciary duty provisions of the Ordinance by repeatedly contacting a City department regarding a pending matter that did not involve a constituent of the official in an apparent attempt to influence the speed and outcome of the matter. The official and the official's attorney met with the Board in June 2018. At its July 2018 meeting, the Board determined that: (i) the official did not violate the Ordinance's Representation of other persons section by contacting a department on behalf of persons who did not live in the official's ward (on behalf of colleagues) but did commit a minor violation of the Ordinance's fiduciary duty provision by informing a City department that if it did not resolve a pending matter by a particular date, the official planned to do something it would not like. The official was sent a confidential letter of admonition.
<b>18008.LOB</b>	<b>Unregistered lobbying</b>	A membership-based non-profit advocacy organization, operating nationwide, sent an open letter to all members of the City Council advocating that they vote against a proposed package of financial assistance being offered by the City to a business. Board staff wrote the organization that there was probable cause to believe that two employees who authored and sent the letter were lobbying on behalf of the organization's membership and required to register. In response, the organization stated that all of its members are natural persons, and none is a corporation or other entity. Staff concluded that the two employees were not required to register as lobbyists.
<b>18036.C</b>	<b>City-owned Property;</b>	Based on a complaint filed with it, the Board determined that there was probable cause to conclude that an aldermanic candidate (who happened to be a City employee) may have violated the Ordinance by authorizing the publication and distribution of printed campaign materials or electioneering

	<b>Political Activity</b>	<p>communications that displayed the City seal. After meeting with the respondent and the respondent's attorney on December 14, the Board determined that the violation was minor and technical, and assessed no fine, but sent the respondent a letter of admonition.</p> <p>The Board also issued an advisory opinion connected with this matter, making clear that any and all candidates for elected City office are prohibited from using the City seal in campaign materials or other electioneering communications. See</p> <p><a href="https://www.cityofchicago.org/city/en/depts/ethics/provdrs/reg/news/2018/november/cityseal.html">https://www.cityofchicago.org/city/en/depts/ethics/provdrs/reg/news/2018/november/cityseal.html</a></p>
<p><b>18044.C.1</b></p> <p><b>18044.C.2</b></p>	<b>Improper Influence</b>	<p>Based on public documents and information available to the Board, the Board determined in January 2019 that there was probable cause to conclude that Alderman Edward Burke violated the Ordinance's Improper Influence provision, §2-156-030(b), by participating in City Council discussions regarding two distinct matters involving persons from whom his law firm had received compensation in the 12 months prior to the participation or reasonably expected to receive compensation in the 12 months following the participation. Fines for violations of this section range between \$500-\$2,000 for each offense.</p> <p>The respondent's attorneys met with the Board to present arguments and documents in order to rebut the Board's finding on April 26, 2019.</p> <p>Case No. 18044.C.1 involves the alderman's presiding over that portion of a Committee on Finance meeting on January 12, 2018, at which a matter involving one of his law firm's clients was heard and voted upon. The alderman had properly disclosed to the Board of Ethics that he intended to recuse from a matter involving Presence Health Care, which entity his law firm represented on an unrelated matter within the 12 months prior to the meeting but presided over that portion of the meeting at which the Presence matter was discussed, introduced witnesses, and answered procedural questions from his colleagues. He then recused himself from the vote. The Board determined by a 4-0 vote (Nancy Andrade, Stephanie Cox-Batson, and Daisy Lezama, absent) that this constituted participation in the matter, pursuant to §2-156-030(b) and Board Case No. 00008.A, <a href="https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/00008-AO-redact.pdf">https://www.chicago.gov/dam/city/depts/ethics/general/AO_ConflictOfInterest/00008-AO-redact.pdf</a> in violation of §2-156-030(b) and assessed a fine of \$2,000 for the violation.</p> <p>Case No. 18044.C.2 involves the alderman's oral and written report to the Mayor and City Council regarding votes taken by the Committee on Finance in its March 26, 2018, meeting relating to General Airport Revenue Bonds. He had properly disclosed that he intended to recuse from this matter because his law firm had represented some of the financial institutions named in it and did properly recuse himself. The Board had before it no evidence that he had presided over that portion of the Committee on Finance meeting in which the airport bond matter was discussed. Hence, by the same 4-0 vote above, the matter was dismissed and closed by the Board.</p> <p>On May 20, 2019, the alderman's attorneys petitioned the Board to reconsider its determination that the</p>

		alderman violated the Ordinance in Case No. 18044.C.1. At its June 2019 meeting, the Board voted unanimously to deny the petition; the alderman raised no facts or information that were not before the Board when it made its determination at its April 2019 meeting.
<b>19008.C</b>	<b>City-owned Property</b>	<p>An aldermanic candidate self-reported that electioneering mailings were sent to voters in the ward showing photographs of the candidate wearing apparel that had the official City seal emblazoned it, and also showed a person apparently in a Chicago Police uniform (but did not display CPD insignia) and a Chicago Fire Department engine with CFD insignia clearly visible.</p> <p>The Board determined that there is probable cause to conclude that the candidate violated §2-156-060 of the Ordinance, and also referred the matter to the Chicago Police and Fire Departments for action they deem appropriate. After meeting with the respondent's attorney, the Board determined, by a 6-0 vote) that: (i) considering the candidate's self-report to the Board, and the overall placement of the City seal within the campaign mailers, the use of the City seal in the mailers constituted a minor Ordinance violation, and to issue the candidate a confidential letter of admonition; and (ii) to direct Board legal staff to work with the General Counsels' office of the Chicago Police and Fire Departments and the Law Department to issue definitive guidance as to the use of CPD and CFD personnel, insignia, or equipment in political or electioneering materials or communications.</p>
<b>19018.C.1</b> <b>19018.C1.LE</b> <b>19018.C.2</b> <b>19018.C.3</b> <b>19018.C4</b>	<b>Unregistered lobbying</b>	<p>Based on documentary evidence made available to the Board, the Board determined, at its May 2019 meeting, that there was probable cause to believe that the three (3) individuals in Case Nos. 19018.C.1, C.2, and C.4 engaged in unregistered lobbying of a City elected official, in violation of the Ordinance. The respondents in cases 19018.C.2 and C.4 met with the Board in July 2019. After that meeting, the Board dismissed both matters, holding that in C.2, the respondent's actions did not constitute lobbying because they were part of the process for applying for a permit, and in C.4 that there was insufficient evidence from which the Board could determine that there was lobbying.</p> <p>In Case No. 19018C.3, the Board determined that there is insufficient evidence for it to find probable cause that the individual engaged in unregistered lobbying and dismissed the matter.</p> <p>In Case No. 19018.C.1, the Board, at its September 2019 meeting, met with Roberto Caldero and his attorney. The Board had informed Mr. Caldero in May 2019, pursuant to §2-156-245 of the Governmental Ethics Ordinance, that: (i) it had determined, based on documents made available in the media, that there was probable cause to conclude that he had engaged in several acts of unregistered lobbying in 2015, in violation of §2-156-230 of the Governmental Ethics Ordinance; (ii) he had the right to rebut the Board's finding; and (iii) if his attempt was unsuccessful, the Board could determine that he violated the Ordinance and make public his name, violation, and the sanction imposed. After this meeting, the Board determined, by a vote of 4-0 (three members absent), that: (i) Mr. Caldero engaged in unregistered lobbying in violation of §2-156-230 of the Ordinance, as he had not rebutted the finding that the facts available to the Board demonstrated he engaged in unregistered lobbying in several attempts to influence a City elected official on behalf of a client with respect to taking City action in both a legislative matter and an</p>

		<p>administrative matter; and (ii) pursuant to its authority set forth in §2-156-265(b)(3) of the Ordinance, the Board fined Mr. Caldero \$25,000 for the violation.</p> <p>At the Board's October 2019 meeting, the Board:</p> <p>(i) denied a request by Mr. Caldero to reconsider its determination; and</p> <p>(ii) in Case No. 19018.C.1.LE, the Board found probable cause to conclude that Elgin Sweeping, Inc., the person who retained or employed Mr. Caldero, violated to §2-156-305 of the Governmental Ethics Ordinance. At its December 6 meeting, the approved resolution of this matter, in which Elgin neither admits nor denies the allegations but nonetheless paid the \$2,000 maximum fine for this type of violation.</p> <p>At the Board's December 2019 meeting, the Board voted unanimously to send the matter of the unpaid \$25,000 fine assessed as to Mr. Caldero to the Department of Law for collection proceedings.</p>
<p><b>19028.01.CF</b>  <b>19028.02.CF</b>  <b>19028.03.CF</b></p>	<p><b>Campaign Financing</b></p>	<p>Based on documents presented to the Board, and on Chicago Park District records that are publicly available, the Board determined there was probable cause to believe a company that did business with the Park District violated §2-156-445(a) of the Governmental Ethics Ordinance by contributing in excess of \$1,500 on three separate occasions to the authorized political committees of two (2) different elected City officials, in 2014 and 2018. In all the cases, the contributor successfully effected refunds of the excess amounts of the contributions. Thus, the Board dismissed each by operation of law without a finding of any violations of the Ordinance.</p>
<p><b>19030.C.1</b>  <b>19030.C.2</b>  <b>19030.C.3</b></p>	<p><b>Improper Influence; Conflicts of Interest/Appearance of Impropriety</b></p>	<p>Based on publicly available documents, the Board determined that:</p> <p>(i) in Case No. 19030.C.1, there was probable cause to conclude that an alderman violated §§2-156-030(b) and -080(b)(2) in a matter involving a client of the alderman's law firm by voting for a matter involving that client within 12 months of when his law firm represented the client. After meeting with the alderman's counsel at its January 2020 Board meeting, the Board voted to dismiss this matter, as the alderman successfully rebutted the Board's probable cause finding by providing evidence that he was not physically present in the Council for the vote on the matter, and subsequently had the record corrected to reflect that in the Council of Journal Proceedings.</p> <p>(ii) in Case No. 19030.C.2, the alderman, Edward Burke, did not successfully rebut the Board's probable cause finding that he violated §2-156-030(b) by writing a letter to another City official in a matter involving a client of his law firm within 12 months of when the alderman's law firm represented this client. Hence, at its meeting on January 13, 2020, the Board determined unanimously that he violated this section of the Ordinance and assessed the maximum fine of \$2,000 for this violation. While he did properly recuse himself from the matter (a Class 6(b) property tax classification application) when it came before City Council committees and the full Council, approximately one year after he wrote this letter, the record showed he failed to do a "due diligence check" before writing the letter to another City official in the matter, which involved a client of his law firm—even though his law firm did not represent the client in this matter.</p> <p>(iii) in Case No. 19030.C.3, the Board does not have sufficient factual information to determine whether there is probable cause to conclude that the alderman violated §2-156-030(b), and requested a factual</p>

		<p>investigation from the Office of Inspector General in the matter, given that a matter pending before City Council appears to have involved a client of the alderman's law firm and the client appears to have been a client within the 12 months preceding the introduction of the matter to City Council.</p>
<p><b>20026.CF.1</b> <b>20026.CF.2</b></p>	<p><b>Campaign Financing</b></p>	<p>At its October 2020 meeting, based on publicly available documents, the Board found probable cause to conclude that a company that was doing business with the City made two (2) campaign contributions to "committees of aldermen" in excess of the amount permitted by the Ordinance. The Board notified the contributor and each of the committees.</p> <p>In Case 20026.CF.1, the Board did not receive any response from the contributor, Benchmark Construction Company, Inc. ("Benchmark"), or the committee, the 34<sup>th</sup> Ward Regular Democratic Committee (the "Committee"), despite receiving "green cards" back with signatures from each, from the Board's certified mailing of its probable cause notice. At its November 2020 meeting, the Board attempted to resolve the matter by directing that Benchmark request and receive a refund of the excessive amount contributed, \$48,500, per §2-156-445(d) to the Committee. Not having heard from the Committee after Benchmark requested the refund, the Board, at its December 2020 meeting, directed that Benchmark and the Committee either appear before the Board at its January 2021 meeting and explain why a refund of the excess amount contributed was not effected or does not need to be effected (or submit written materials explaining this), or the Board could determine there was a violation of the Ordinance, which could subject both the contributor and committee to fines of up to three times (3x) the excessive amount contributed, per §2-156-465(b)(5).</p> <p>Because this did not occur, but Benchmark did make another attempt to effect a refund, the Board, at its January 2021 meeting, voted unanimously to determine that Benchmark and the Committee each violated the political contribution limits in §2-156-445(a). It assessed a \$145,500 fine against the Committee and a \$5,000 fine against Benchmark. 34<sup>th</sup> Ward Alderman Carrie Austin has several political committees, two of which support candidacies for committeeperson of either her Ward or her State legislative district. One of those committees is a party-political committee, the 34<sup>th</sup> Ward Regular Democratic Committee, which, per its filings with the Illinois State Board of Elections, could support either or both of the Alderman's candidacies for alderman or ward or legislative district committeeperson. At its February 2021 meeting, the Board heard from the Committee and its attorney, and agreed to continue the matter to its March 2021 meeting in order to enable the Committee to respond fully to the Board's determinations. At its March meeting, the Board again heard from the Committee and its attorney, who argued that the Board did not provide proper notice of its probable cause finding to the Committee, and that the Committee did not know when it accepted the contribution that Benchmark was doing business with the City, but did also not check the list of persons doing business with the City (and its sister agencies) that the City maintains precisely for this purpose, pursuant to §2-156-520. The Board then voted to re-issue the probable cause notice to the Committee, given that the original notice sent to the Committee after the Board's October probable cause finding contained a typographical error and was misaddressed to an incorrect street address, even though the Board received a certified mail "green card" back signed by an individual on November 5, 2020. The Committee stated to the Board that the signature on the returned green card was not that of an employee of the Committee.</p>

		<p>At its April 12 meeting, after considering all the equities in the case, including the Committee's ability to pay a fine and reimburse Benchmark the \$48,500 in excess contributions, the impact on Chicagoans in Alderman Austin's ward of a treble damage fine, and the Committee's admission that Benchmark's \$50,000 contribution exceeded the limitation in §2-156-445(a) by \$48,500, the Board voted to impose a \$5,000 fine against the Committee, the same fine it imposed on Benchmark, and to direct that the Committee pay the fine and reimburse Benchmark for the excess amount by May 10, 2021, or the Board will take appropriate steps to enforce its determinations. The Board explicitly rejected the argument that a recipient committee, like the 34<sup>th</sup> Ward Regular Democratic Committee in this case, could claim it did not "knowingly accept a contribution that is in violation" of §2-156-445(a) if, as here, it failed to check the database provided by the City (pursuant to §2-156-520) of persons doing business with the City and other named sister agencies.</p> <p>As the Committee had paid neither the \$5,000 fine nor reimbursed Benchmark in the amount of the excessive contribution, the Board voted unanimously at its May 10 meeting to refer the matter to the Law Department for collection of the fine and to file an action compelling the Committee to refund the excessive contribution amount, if neither was effected before May 11, 2021. Neither was, so the matter was referred to the Law Department for collection.</p> <p>In Case 20026.CF.2, after the parties received the Board's probable cause letter, the excess amount (\$1,000) was properly and promptly refunded to the contributor and the case was closed by operation of law.</p>
<p><b>20036.C</b></p>	<p><b>Fiduciary Duty</b></p>	<p>Based on publicly available documents, the Board voted unanimously at its November 16, 2020 meeting to determine there is probable cause to conclude that Alderman Howard Brookins (21<sup>st</sup> Ward), a licensed Illinois attorney, may have violated the Ordinance's fiduciary duty provision, §2-156-020, by filing an appearance on October 29, 2020 to represent a client in a criminal case pending in the Cook County Circuit Court, as the case is one in which Chicago Police Department members were the arresting officers and will be material witnesses. This is in direct contravention of an advisory opinion the Board issued in September 2019 and of the Board's denial to change its opinion after the respondent asked for reconsideration of that opinion in October 2019.*</p> <p>The Alderman was entitled to meet with the Board and/or present written arguments and materials to attempt to rebut the Board's finding but did neither. The Board voted unanimously at its December 2020 meeting that Alderman Brookins violated the Ordinance's fiduciary duty provision and imposed the maximum \$5,000 fine for this violation. At its January 2021 meeting the Board voted unanimously to send the fine to the Department of Law for collection proceedings.</p> <p>*See <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/A19027.A.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/A19027.A.pdf</a> and <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-Attorneys/19027.AReconsid.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-Attorneys/19027.AReconsid.pdf</a></p>

<b>21009.C</b>	<b>Statements of Financial Interests; Conflicts of Interest; Appearance of Impropriety</b>	<p>Based on publicly available documents, the Board voted unanimously at its April 2021 meeting to refer a matter to the IG for any action it deems appropriate, including investigation. Publicly available documents indicate that a City official did not disclose items on two previously filed Statements of Financial Interests, and also failed to disclose the potential conflict of interest and recuse from a City Council meeting involving a person from which the official had, in the previous 12 months, received income or compensation, or reasonably expected to receive compensation or income from the person in the following 12 months. Officials and employees are subject to a determination they violated the Ordinance if they are found to have “knowingly” filed a false or misleading Statement of Financial Interests, and to appropriate sanctions, including fines and removal from office, or if they failed to properly disclose a potential conflict of interests to the Board and recuse from a City Council vote in a matter involving a person from whom they have received income or compensation within the past 12 months, or reasonably expect to receive income or compensation in the following 12 months.</p> <p>On May 7, 2021, the IG confirmed that it is unable to commence an investigation into these matters because they occurred more than five (5) years prior and thus an investigation into them is barred by §2-56-155 of the Municipal Code of Chicago.</p>
<b>21014.C</b>	<b>Aspirational Code of Conduct</b>	<p>Since its May 2021 meeting, the Board received five (5) written citizen complaints, each alleging in varying degrees that a public statement by a City official constituted “illegal” and “disrespectful” discrimination and racism.</p> <p>The sole section in the City’s Governmental Ethics Ordinance (the “Ordinance”) relevant to these complaints is the “aspirational” “code of conduct,” §2-156-005 of the Ordinance. It provides, in pertinent part:</p> <p>“The code of conduct set forth in this section shall be aspirational and shall guide the conduct of every official and employee of the City. All officials and employees of the City shall ... (5) act impartially in the performance of their duties, so that no private organization or individual is given preferential treatment ... (11) adhere to all applicable laws and regulations that provide equal opportunity for all persons regardless of race, color, religion, gender, national origin, age, sexual orientation, or handicap.”</p> <p>However, §2-156-005(c) provides that “This section is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the City ... its officers, employees, or agents, or another person.”</p> <p>After due deliberation, the Board voted unanimously at its June 2021 meeting to dismiss these complaints and take no further action on them. Pursuant to §2-156-400 of the Ordinance, the identity of the complainants, as well as the person complained against, shall remain confidential.</p>

<p><b>21019.L.1</b></p>	<p><b>Unregistered Lobbying</b></p>	<p>Based on publicly available documents indicating that a businessperson may have engaged in unregistered lobbying of the Mayor, the Board determined, at its July 2021 meeting, there was probable cause to conclude that the respondent violated §2-156-245 of the Ordinance (entitled “Failure to Register”). The Board met with the respondent at its September 2021 meeting. After that meeting, the Board voted 4-0 to determine that the respondent, Michael Alter, violated the Ordinance by lobbying the Mayor to influence “administrative action” on behalf of the Chicago Women’s Basketball Operation, LLC (the “Sky”), by requesting that the Mayor take a public position, in her capacity as Mayor, supporting the Sky’s position as to gaming legislation then pending before the General Assembly in Springfield but failing to register with the Board as a lobbyist for this activity. The Board also voted to assess a fine of \$5,000, which was paid on October 18.</p>
<p><b>21029.C</b></p>	<p><b>City-owned Property; Aspirational Code of Conduct</b></p>	<p>1. Based on publicly available documents, at its September 2021 meeting, the Board determined there is probable cause to conclude that a City official violated §2-156-060 (entitled “City-owned property”) on two separate occasions by:</p> <ul style="list-style-type: none"> <li>(i) directing a City employee under the official’s supervision to consider and discuss with the official withholding City services to a constituent because the constituent appears to have supported a political opponent of the official, and</li> <li>(ii) directing a City employee under the official’s supervision to obtain and “leak” to social media criminal records of a constituent who had taken a position on matter different from the official’s.</li> </ul> <p>2. The Board also determined (citing Case No. 21012.A <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/21012.A.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_ElectOfficials/21012.A.pdf</a> ) that directing City employees under one’s supervision to carry out personal tasks in the ways described in 1 above while on compensated time violates the §2-156-060 of Ordinance as a matter of law.</p> <p>3. The Board also determined that, while the Ordinance’s language precludes the Board from enforcing the “aspirational” code of conduct (§2-156-005, entitled “Code of Conduct”), §§2-156--005(a)(4) and (5) of this code, respectively, require City officials and employees to “treat members of the public with respect and be responsive and forthcoming in their requests for information” and “act impartially in the performance of their duties, so that no private organization or individual is given preferential treatment” <b>and that failure to adhere to these standards in the ways alleged and described in 1 above is per se unethical.</b></p> <p>4. Finally, the Board voted to formally request that the IG conduct a full factual investigation into any other</p>



		<p>instances where this official’s conduct may have violated these or other Ordinance provisions.</p> <p style="text-align: center;">***</p> <p>The official was entitled to meet with the Board to attempt to rebut these probable cause findings. An attorney for the official did meet with the Board at its November 2021 meeting. The official proffered several defenses. Based on new factual issues raised by the official here, and, having considered the record before it, the Board then voted unanimously, 5-0, that the veracity and accuracy of these new factual claims and defenses must be investigated by an agency with appropriate authority, and referred the matter to the Office of Inspector General for a full factual investigation.</p> <p>Additionally, the Board, as part of its formal motion, called on the City Council to amend the Governmental Ethics Ordinance so as to make enforceable and sanctionable certain requirements of the “aspirational code of conduct,” currently in §2-145-005 of the Ordinance, to address matters of official misconduct. This “aspirational code of conduct” was added to the Ordinance effective November 1, 2012. The Board has previously called for this “aspirational code” to be amended, as it weakens the perception that ethical behavior is taken seriously. See <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/memos/PressRelMay2019.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/memos/PressRelMay2019.pdf</a></p> <p>Many of these now “aspirational” goals describe conduct by City employees and elected and appointed officials the public is absolutely entitled to expect from its public employees and officials. Failure to meet these standards should be actionable and enforceable by the Board of Ethics; the Ordinance should be amended by the City Council accordingly. The public deserves no less.</p>
<p><b>21033.CF.01;</b>  <b>21033.CF.02;</b>  <b>21033.CF.03</b></p> <p><b>22005.A</b></p>	<p><b>Campaign Financing</b></p>	<p>Based on a citizen complaint, the Board, at its October 2021 meeting, found probable cause to conclude that an entity that was seeking a zoning amendment (and thereby was “seeking to do business” with the City as defined in §2-156-445(a)(ii)) made three (3) political contributions to two (2) political fundraising committees in 2020 and 2021, within six (6) months of the time the zoning matter was pending before City Council.</p> <p>The contributor and recipient political committees were notified that by law they had the right to effect reimbursement of the excessive contribution amounts or contest the Board’s findings in writing on or before October 29, 2021.</p> <p>In Case No. 21033.CF.03, the recipient committee refunded the excess amount contributed on October 29, thereby ending the matter without a finding of a violation.</p> <p style="text-align: center;">***</p> <p>The two remaining matters, 21033.CF.01 and -.02, were taken up by the Board at its November and</p>

		<p>December 2021 and January 2022 meetings. The contributor and receiving political committee argued that the committee was independent of any elected official, organized as a Political Action Committee (PAC) under the Illinois Election Code. At its December meeting, the Board voted to request the assistance of the Office of Inspector General to assist the Board in determining whether the PAC constitutes a “candidate’s authorized political committee,” or a “political fund-raising committee of a candidate for City office or elected official.” In late December 2021, the PAC and contributor effected a refund of the excessive contributions. Thus, at its January 2022 meeting, the Board dismissed Cases 21033.CF.1 and -CF.2 as a matter of law, without a finding of a violation, per §2-156-445(d).</p> <p>However, at its January 2022 meeting, based on evidence in the public record that the Board became aware of after its December meeting, voted 5-0 to determine that the PAC in the case before it indeed constitutes “one of the candidate’s political fundraising committees.”</p> <p>At its February 2022 meeting the Board issued a formal advisory opinion delineating the factors it will consider in determining whether <b>any</b> political fundraising committee other than an official “candidate” committee established under 10 ILCS 5/9-1.8(b) would constitute a “political fundraising committee of a candidate for City office or elected official” such that contributors to it would be subject to the contribution limits in the Ordinance, and that these contributors and committees may effect refunds pursuant to per §2-156-445(d) or be subject to the fine provisions in per §2-156-465(b(5)). See Case 22005.A: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinanacing/21033.AO.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinanacing/21033.AO.pdf</a></p>
<b>21037.C</b>	<b>Prohibited Political Activities</b>	In December 2021 a City official self-reported that they had inadvertently sent an invitation to a political fundraiser from their City email account, but then, immediately realizing the error, recalled it and re-sent it from an appropriate email account. At the Board’s December 2021 meeting, it voted 6-0 to determine that this constituted a minor violation and sent the official a confidential letter of admonition.
<b>22004.C</b>	<b>Prohibited Political Activities; Unauthorized Use of Real or Personal City Property</b>	At its March 2022 meeting the Board considered a citizen complaint alleging that an elected official improperly posted political content on a social media account that effectively functioned as an official City account (given that the official has posted Ward-related material on it). The Board determined by a 5-0 vote that the postings at issue did not warrant a finding of probable cause that the elected official had intentionally misappropriated City property or resources in connection with any “prohibited political activity” as defined in the Ordinance and dismissed the matter.
<b>22013.IG</b>	<b>Prohibited Political Activities; Unauthorized Use of Real or Personal City Property</b>	<p>At its April 2022 meeting, the Board voted 5-0 to find there is probable cause to conclude that an elected City official violated both §§2-156-060 and -135(b) of the Governmental Ethics Ordinance by including photographs of the official with City-owned property on the official’s political/campaign social media page, contrary to the Board’s determination in Case No. 18038.A.1: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/18038.A.1.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO-City%20Owned%20Property/18038.A.1.pdf</a>.</p> <p>The official met with the Board at its June 2022 meeting to attempt to rebut the Board’s finding. After the meeting, the Board voted 5-0 to continue the matter, provided that the official work with the Board to</p>

		<p>ensure the official's social media pages and official website comply with the Ordinance, and to retain appropriate technical assistance if needed to properly maintain social media sites. The official met with Board staff and made appropriate modifications and corrections to the site, and the Board dismissed the matter.</p> <p>The matter was based on a referral to the Board from the Office of Inspector General, based on a citizen complaint it received.</p>
<b>22022.C</b>	<b>Prohibited Political Activities; Unauthorized Use of Real or Personal City Property</b>	<p>At its June 2022 meeting the Board voted 5-0 to find there is probable cause to conclude that an elected City official violated §§2-156-060 and -135(b) of the Government Ethics Ordinance by distributing an official ward newsletter that contained an invitation to an event that was political, that is, to kick-off another candidate's campaign, emailed from a cityofchicago.org email address. This is contrary to Board guidance on the improper mixing of political and official content in newsletters and websites that was sent to all City elected officials in January 2020.</p> <p>The official, Ald. Derrick Curtis (18<sup>th</sup> Ward), with his attorneys, met with the Board at its August 2022 meeting to attempt to rebut the Board's finding. After that meeting, the Board voted 6-0 to determine that he violated the above provisions of the Ordinance and assessed a fine of \$1,000. Ald. Curtis paid the fine and the Board dismissed the matter, which was based on a citizen complaint the Board received.</p>
<b>22023.CF.1</b> <b>22023.CF.2</b>	<b>Campaign Financing</b>	<p>At its June 2022 meeting, the Board voted 5-0 to request that the IG conduct a factual investigation to aid the Board in determining whether three (3) entities are "affiliated" companies, per §2-156-445(b) of the Ordinance. Two (2) of these companies each contributed in excess of \$1,500 to an authorized political fundraising committee of a City elected official. If the Board determines that the companies are indeed "affiliated," then it could find probable cause that both these companies and the recipient political fundraising committee violated the Ordinance, subjecting each to fines of three times (3x) the amount of their excess contributions.</p> <p>The Board has delineated the factors to be considered in determining whether companies are "affiliated" (for purposes of §2-156-445) in these advisory opinions:  <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/03010.55.CF.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/03010.55.CF.pdf</a>,  <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/17017.cf.doc">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/17017.cf.doc</a>  and <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/17017.cf-recon.docx">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_CampFinancing/17017.cf-recon.docx</a></p>
<b>22028.L</b>	<b>Lobbyist Registration</b>	<p>An individual registered as a lobbyist in 2021 failed to timely re-register or terminate for 2022, and was found in violation of the Ordinance and fined. The individual then asked the Board to reconsider its determination and judgment on the basis that the individual had health issues precluding their re-registration, and to enable the individual to re-register for 2022 and waive all fines. At its October 2022 meeting, the Board 6-0 voted to offer to meet with the individual at its November 2022 meeting to consider the matter. At its November 2022 meeting, the Board heard from the individual and dismissed any outstanding fines for their failure to re-register or terminate, thereby enabling the individual to re-register as a lobbyist without penalty if the individual so wishes.</p>

<p><b>22030.01C</b>  <b>22030.02.C</b>  <b>22030.03.C</b></p>	<p><b>Prohibited Political Activities; Unauthorized Use of City Property</b></p>	<p>In these three cases, each based on citizen complaints against an elected official, the Board voted 5-0 at its November 2022 meeting to take no action and dismiss them. The first two alleged that the official improperly announced a re-election bid on an “official” social media page. The Board held that this is a factual announcement and there was no electioneering communication made on the page, thus there was no improper use of City property for prohibited political activity. In the third, a citizen alleged that the official failed to condemn hate speech or the person who allegedly posted the hate speech on the official’s social media page. The Board held that, while this hate speech is abhorrent, the Governmental Ethics Ordinance does not impose an affirmative duty on the official to condemn it or block the poster—rather, this important issue is one for the electorate to consider.</p>
<p><b>22031.C</b></p>	<p><b>Prohibited Political Activities; Unauthorized Use of City Property</b></p>	<p>In this matter, a complaint was filed against a candidate for elected City office alleging that the candidate, a City employee, was improperly campaigning for elected office with City property, and improperly using City property in electioneering communications. Because the facts were not clear, the Board voted 5-0 at its November 2022 meeting to refer the matter to the Office of Inspector General for a factual investigation.</p>
<p><b>22032.C</b></p>	<p><b>Prohibited Political Activities; Unauthorized Use of City Property</b></p>	<p>In this matter, a complaint was filed against a candidate for elected City office, alleging that the candidate improperly used photographs of City property on a campaign internet page. Given the change in the Ordinance that took effect on October 1, 2022, granting jurisdiction to the Board over candidates who are not already City officials or employees, with respect to the use of City property for prohibited political activity, the Board voted 5-0 at its November 2022 meeting to send an explanatory letter to the candidate, directing the candidate to take down or edit the postings, and to send a general letter of advisement to all candidates for City elected office regarding the restrictions on such postings.</p>
<p><b>22036.L</b></p>	<p><b>Lobbyist Registration</b></p>	<p>At its December 2022 meeting, the Board voted 5-0, pursuant to §2-156-390, to issue a 10-day notice to an individual about whom the Board has facts indicating the individual may have lobbied City officials or employees without having registered as a lobbyist for the person on whose behalf the individual communicated with those City officials or employees. The individual had 10 business days to respond to the Board to argue that the matter should be dismissed, and no finding of probable cause made. The individual did respond.</p> <p>At its January 2023 meeting, the Board considered the subject’s response to its 10-day notice, and voted 5-0 to issue a Notice of Probable Cause. At its February 2023 meeting, the Board voted 4-0 to continue the matter and authorize potential settlement discussions, and at its April 2023 meeting, voted 4-0 to approve a settlement with Carmen Rossi for \$5,000. The Agreement is posted here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/22036.L.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/22036.L.pdf</a></p>
<p><b>22036.01-11.IG</b></p>	<p><b>Limitation of contributing to candidates and elected officials</b></p>	<p>At its December 2022 meeting, the Board 5-0 voted to refer these matters, involving political contributions made to candidates for elected City office, to the Office of Inspector General for a full factual investigation.</p>
<p><b>22037.IG</b></p>	<p><b>Limitation of contributing to</b></p>	<p>At its December 2022 meeting, the Board voted 5-0 to refer this matter, alleging that a political contribution made to a candidate for elected City office may have constituted a <i>quid pro quo</i>, to the Office of Inspector</p>

	<b>candidates and elected officials</b>	General for a full factual investigation.
<b>22038.01.IG</b>	<b>Fiduciary duty; Unauthorized Use of City property; Prohibited political activities</b>	At its December 2022 meeting, the Board voted 5-0 to refer this matter to the Office of Inspector General for a full factual investigation. It arises from a citizen complaint against a candidate for elected office, alleging that the candidate violated the Ordinance's fiduciary duty, unauthorized use of City property, and prohibited political activities provisions, by allegedly harassing individuals gathering petition signatures on behalf of an electoral opponent.
<b>22038.02.IG</b>	<b>Use of City property; Prohibited political activities</b>	At its December 2022 meeting, the Board voted 5-0 to refer this matter to the Office of Inspector General for a full factual investigation. It arises from a citizen complaint against a candidate for elected office, alleging that electioneering materials in support of the official were improperly posted in a City facility.
<b>22039.01-06</b>	<b>No Jurisdiction</b>	At its January 2023 meeting, the Board 5-0 voted to dismiss a citizen complaint alleging that six (6) City employees violated the Governmental Ethics Ordinance by posting racially/culturally insensitive comments on another's social media page. The employees' department investigated the matter and determined the employees had violated departmental policy, and disciplined them. The Board dismissed the complaint on the basis that the matter had already been investigated and adjudicated by the employees' City department.
<b>23004.C</b>	<b>Use of City property; Prohibited political activities</b>	The Board received repeated citizen complaints alleging that campaign signage violated one or more provisions of the City's Municipal Code other than the Governmental Ethics Ordinance, and thereby allegedly violated the Governmental Ethics Ordinance. At its January 2023 meeting, the Board voted 5-0 to refer this matter to the Office of Inspector General for a full factual investigation, and to approve staff's advice to the complainant/s, referring the complainant/s to the appropriate City agency that has jurisdiction to investigate and/or adjudicate the alleged violation/s of the Municipal Code other than the Governmental Ethics Ordinance.
<b>23006.C</b>	<b>Use of City property; Prohibited political activities</b>	<p>The Board received a formal complaint in this matter on January 12. The complaint alleges that the campaign of a candidate for elected City office violated the Ordinance's gift and prohibited political activities provisions by sending emails asking to governmental employees at their official governmental email addresses; the emails requested participation in the campaign.</p> <p>At its January 2023 meeting, the Board voted 5-0 to refer the complaint for full factual investigations to the Offices of the Inspectors General of the City and of the government entity that employs the emails' recipients.</p> <p>On behalf of the entire Board, the Chair made a public statement urging that all candidates for elected office and their affiliated campaign officials and staff immediately and thoroughly scrub their email lists of any governmental addressees, as emails sent to such addresses soliciting political contributions or requesting other participation in political activity may be considered coercive.</p>

		Note: the Board does not have jurisdiction to administer, interpret or enforce ethics codes or policies of agencies other than the City of Chicago. However, the Board does have authority to receive and refer complaints alleging violations of such codes or policies to the relevant Inspectors General, per §2-156-380(a) of the Ordinance, and exercised that authority in this matter.
<b>23007.C</b>	<b>Prohibited political activities</b>	In January 2023 a City official self-reported that they had inadvertently sent emails soliciting political contributions from their City email account, on their personal, non-City laptop, but then, immediately realizing the error, recalled the emails and re-sent them from an appropriate email account. Following Case nos. 21037.C and 20008.C, the Board voted 5-0, at its January 2023 meeting, to determine that this constituted a minor violation and sent the official a confidential letter of admonition.
<b>23008.C</b>	<b>Use of City property; Prohibited political activities</b>	Based on a citizen complaint, the Board voted 5-0 at its January 2023 meeting to issue a candidate a 10-day notice of intent to find probable cause. The complaint alleges that electioneering communications on behalf of the candidate improperly displayed City intellectual property. Pursuant to §2-156-390 of the Ordinance, the subject has 10 business days to respond to the Board’s notice to urge the Board to dismiss the matter and not make a finding of probable cause.  At the Board’s June 2023 meeting, the Board, having considered the candidate’s response, voted to find that the candidate committed a minor violation of the Ordinance’s Unauthorized Use of City Property and Prohibited Political Activity provisions.
<b>23009.C</b>	<b>Use of City property; Prohibited political activities</b>	The Board received multiple citizen complaints alleging that a social media post on an official City social page of an elected official constituted improper harassment of a citizen, and contained improper electioneering content. At its January 2023 meeting, the Board voted 5-0 to approve staff’s referral of the complaint to the Office of the Inspector General for a full factual investigation.
<b>23010.C</b>	<b>Use of City property; Prohibited political activities</b>	Based on a complaint, the Board voted 5-0 at its January 2023 meeting to issue a candidate a 10-day notice of intent to find probable cause. The complaint alleges that electioneering communications on behalf of the candidate improperly displayed City intellectual property. Pursuant to §2-156-390 of the Ordinance, the subject had 10 business days to respond to the Board’s notice to urge the Board to dismiss the matter and not make a finding of probable cause. The candidate did respond.  At its February 2023 meeting, the Board considered the candidate’s written response, and voted 4-0 to dismiss the matter, as no City-owned property was in fact used—logos in the electioneering communications did not contain City-owned property, although there was an apparent resemblance to such property.
<b>23011.C</b>	<b>Representation of Other Persons</b>	At its February 2023 meeting, the Board voted 4-0 to dismiss a matter in which a City Council contractor self-reported a potential past Ordinance violation involving their representation of a person in a judicial proceeding in which the City was an adverse party, that matter being wholly unrelated to their City work.
<b>23012.C</b>	<b>Prohibited political activities</b>	At its February 2023 meeting, the Board voted 4-0 to dismiss this matter, involving a complaint that a candidate for elected City office has engaged in vote-buying. The Board took notice of the provision in the Illinois Election Code that prohibits vote-buying, 10 ILCS 5/29-1, and that interpretation, administration, and enforcement of this statute falls to other agencies and is outside of the Board’s purview.

<b>23013.C</b>	<b>Use of City property; Prohibited political activities</b>	The Board received multiple citizen complaints alleging that a candidate's electioneering communications improperly displayed City intellectual and other property. At its February 2023 meeting, the Board voted 4-0 to issue the candidate a 10-day notice of intent to find probable cause. Pursuant to §2-156-390 of the Ordinance, the candidate responded in writing. At the Board's June 2023 meeting, the Board, having considered the candidate's response, voted to find that the candidate committed a minor violation of the Ordinance's Unauthorized Use of City Property and Prohibited Political Activity provisions. The letter is of admonition is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23013.C.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23013.C.pdf</a>
<b>23014. C</b>	<b>Use of City property; Prohibited political activities</b>	The Board received a complaint alleging that a candidate's electioneering communications improperly displayed City intellectual and other property. At its February 2023 meeting, the Board voted 4-0 to issue the candidate a 10-day notice of intent to find probable cause. Pursuant to §2-156-390 of the Ordinance, the candidate responded in writing. At the Board's June 2023 meeting, the Board, having considered the candidate's response, voted to find that the candidate committed minor violations of the Ordinance's Unauthorized Use of City Property and Prohibited Political Activity provisions. The letter of admonition is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23026.C.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23026.C.pdf</a>
<b>23015.C</b>	<b>Use of City property; Prohibited political activities</b>	At its February 2023 meeting, the Board voted 4-0 to continue this matter, involving assertions that a candidate's apparent electioneering communications improperly displayed City property, as the Board cannot verify that the communications were actually disseminated. At its March, April, and June 2023 meetings, the Board voted to again continue this matter, as it was referred to the Civilian Office of Police Accountability for investigation.
<b>23016.C.1 23016.C.2</b>	<b>Use of City property; Prohibited political activities</b>	In Case 23016.C.1, the Board voted 4-0 at its February 2023 meeting to dismiss a complaint alleging that a candidate improperly engaged in prohibited political activity while in a City facility, answering questions put to that candidate at an event that was open to the public; the Governmental Ethics Ordinance does not prohibit a candidate from answering questions regarding that candidate's stances on issues important to the electorate under such circumstances.  In Case 23016.C.2, based on a complaint that a candidate improperly used City property for electioneering purposes, the Board voted 4-0 at its February 2023 meeting to refer the matter to the Office of the Inspector General to help ascertain whether the property is available for public use.
<b>23017.C</b>	<b>Use of City property; Prohibited political activities</b>	The Board received multiple citizen complaints alleging that a candidate's electioneering communications improperly displayed City intellectual and other property. The Board voted 4-0 at its February 2023 meeting to issue the candidate a 10-day notice of intent to find probable cause. Pursuant to §2-156-390 of the Ordinance, the candidate responded in writing to the Board's notice. At the Board's June 2023 meeting, the Board, having considered the candidate's response, voted to find that the candidate committed a minor violation of the Ordinance's Unauthorized Use of City Property and Prohibited Political Activity provisions.
<b>23018.C</b>	<b>Use of City property; Prohibited political activities</b>	The Board received a citizen complaint alleging that a candidate's electioneering communications improperly displayed City intellectual and other property. The Board voted 4-0 at its February 2023 meeting to issue the candidate a 10-day notice of intent to find probable cause. Pursuant to §2-156-390 of the Ordinance, the candidate responded in writing. At the Board's June 2023 meeting, the Board, having considered the candidate's response, voted to find that the candidate committed a minor violation of the



		Ordinance's Unauthorized Use of City Property and Prohibited Political Activity provisions.
<b>23019.C</b>	<b>Use of City property; Prohibited political activities</b>	The Board received a citizen complaint alleging that a candidate's electioneering communications improperly displayed City intellectual and other property. The Board voted 4-0 at its February 2023 meeting to issue the candidate a 10-day notice of intent to find probable cause. Pursuant to §2-156-390 of the Ordinance, the subject responded in writing. At the Board's June 2023 meeting, the Board, having considered the candidate's response, voted to find that the candidate committed a minor violation of the Ordinance's Unauthorized Use of City Property and Prohibited Political Activity provisions.
<b>23020.C.1 230210.C.2-C.5 23020.C.6</b>	<b>Use of City property; Prohibited political activities</b>	<p>The Board received multiple citizen complaints alleging that a candidate improperly used City property for electioneering purposes on the candidate's official and/or political social media accounts.</p> <p>The Board voted 4-0 to dismiss Case C.1 at its February 2023 meeting on the basis that the posting did not constitute electioneering or political activity in the first place.</p> <p>The Board voted 4-0 to dismiss Case C.2 at its February 2023 meeting on the basis that a posting and other communication contained no electioneering content, rather, contained just information on the location and hours of polling places, which is politically neutral and can be posted properly on either official or political social media accounts.</p> <p>The Board voted 4-0 to dismiss Cases C.3-C.5 at its February 2023 meeting on the basis that including an advertisement for a candidate forum sponsored by local non-profit and religious organizations in either a Ward newsletter or on an official or political social page does not constitute prohibited political activity.</p> <p>In Case C.6, the Board voted 4-0 at its February 2023 meeting to issue the candidate a 10-day notice of intent to find probable cause, on the basis that a political social media account appears to improperly use images of City intellectual property. Pursuant to §2-156-390 of the Ordinance, the subject responded in writing, arguing that the posting had been voluntarily removed prior to the Board's February 2023 meeting and 10-day notice. At the Board's June 2023 meeting, the Board, having considered the candidate's response, voted to find that the candidate committed a minor violation of the Ordinance's Unauthorized Use of City Property provision. The letter of admonition is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23020.C.6.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23020.C.6.pdf</a></p>
<b>23021.C</b>	<b>Prohibited political activities; Incidental use of the City seal— Authorized when</b>	<p>The Board voted 3-1 at its February 2023 meeting to issue a candidate a 10-day notice of intent to find probable cause, on the basis that an electioneering communication appeared to use the City seal in a manner that was not consistent with §2-156-050 of the Ordinance. Pursuant to §2-156-390 of the Ordinance, the candidate responded.</p> <p>At its March and April 2023 meetings, the Board, having considered the candidate's response, voted to proceed with this matter, and to request an original version of the electioneering communication so as to further examine the use of the City seal in it.</p> <p>At the Board's June 2023 meeting, the Board, having considered the candidate's response, voted to find that the candidate committed a minor violation of §2-156-050, "Incidental use of the City seal—Authorized</p>



		when.” The letter of admonition is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23021.C.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23021.C.pdf</a>
<b>23022.C</b>	<b>Use of City property; Prohibited political activities</b>	At its February 2023 meeting, the Board voted 4-0 to continue this matter, involving assertions that a candidate’s apparent electioneering communications improperly displayed City property, as the Board cannot verify that the communications were actually disseminated. At its March, April, and June 2023 meetings, the Board voted to again continue this matter, as it was referred to the Civilian Office of Police Accountability for investigation.
<b>23023.C</b>	<b>Use of City property; Prohibited political activities</b>	The Board received a citizen complaint alleging that a candidate’s electioneering communications improperly displayed City intellectual and other property. The Board voted 4-0 at its February 2023 meeting to issue the candidate a 10-day notice of intent to find probable cause. Pursuant to §2-156-390 of the Ordinance, the candidate responded in writing and demonstrated that the communication was sent by an independent expenditure committee. On March 20, the Board voted 5-0 to dismiss the matter for lack of jurisdiction.
<b>23026.C</b>	<b>Use of City property</b>	At its June 2023 meeting, the Board voted to send the candidate a 10-day notice of intent to find probable cause, and a minor violation of the Unauthorized Use of City Property provision. The Board had received a citizen complaint that the candidate’s electioneering communications improperly used City property.  At its August 14, 2023 meeting, the Board met with the candidate and candidate’s counsel. After considering the arguments made, the Board voted 5-0 to determine the candidate committed a minor violation of the Ordinance’s Use of City property provision. The subject then asked the Board to reconsider its determination, but the Board denied that request at its September 2023 meeting. The letter of admonition is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23026.C.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AOMinorViolations/23026.C.pdf</a>
<b>23030.C</b>	<b>Use of City property</b>	At its June 2023 meeting, the Board voted to send the candidate a 10-day notice of intent to find probable cause, and a minor violation of the Unauthorized Use of City Property provision. The Board had received a citizen complaint that the candidate’s electioneering communications improperly used City property.  On August 14, 2023, the Board considered the candidate’s written submission, and voted 5-0 to determine the candidate had committed a minor violation of the Ordinance’s Use of City property provision.
<b>23033.C</b>	<b>Prohibited political activities</b>	At its March 2023 meeting, the Board voted 5-0 to confirm the referral of this matter to the Office of the Inspector General for a full factual investigation. The matter involves a complaint that a candidate’s auto-response to emails contained electioneering content, and was sent in reply to persons emailing the candidate, including persons emailing the candidate from governmental email addresses.
<b>23035.C</b>	<b>Statements of Financial Interests</b>	At its April 2023 meeting, the Board discussed complaints it received alleging a candidate for elected City office failed to disclose required items on their Statement of Financial Interests. The Board noted that: i) these complaints require a factual investigation; and ii) the complaints were also filed with the IG, which can conduct a factual investigation and, at the conclusion of any such investigation, if it believes there were any violations of the Ordinance, petition the Board to adjudicate matter pursuant to §§2-156-385 and -392 of the Ordinance.
<b>23042.L</b>	<b>Lobbying:</b>	At its August 2023 meeting, the Board voted 5-0 to enter into an agreement with Djavan Conway, who had failed either to re-register or terminate his 2021 lobbyist registration in January 2022, despite the fact he

	<b>Failure to register; Termination of lobbying</b>	had been sent multiple notices of the requirement to do one or the other. Under the agreement, he is paying a \$10,000 fine. After paying the fine he will be able to re-register as a lobbyist should he wish to do so. The agreement is posted here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/Djavan-Conway-23042.L.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/Djavan-Conway-23042.L.pdf</a>
<b>23050.C</b>	<b>Prohibited political activity; Fiduciary Duty; Unauthorized use of real or personal City property</b>	At its September 2023 meeting the Board voted 5-0 to affirm the referral to the IG of a complaint alleging that a City elected official has engaged in violations of three provisions of the Ordinance.
<b>23056.CF</b>	<b>Campaign Financing</b>	At its November 2023 meeting, the Board voted 4-0 that there is probable cause to conclude that an entity that is “affiliated” with another entity doing business with the City (and thus subject to the Ordinance’s \$1,500 annual limit in political contributions to any candidate for elected City office) made a political contribution to the candidate committee of a City Council member that exceeded \$1,500, in violation of §2-156-445(a) and (b) of the Ordinance. The Board directed that a notice of probable cause be sent to both the contributor and the committee.  The contributor and the committee effected a refund within 10 days of the Board’s notice, thus the Board dismissed the matter pursuant to §2-156-445(d) at its December 2023 meeting.
<b>23057.CF</b>	<b>Campaign Financing</b>	At its November 2023 meeting, the Board voted 4-0 that there is probable cause to conclude that an entity that is doing business with the City (and thus subject to the Ordinance’s \$1,500 annual limit in political contributions to any candidate for elected City office) made a \$5,000 political contribution to the candidate committee of a Mayoral candidate, Vallas for Mayor, that exceeded \$1,500, in violation of §2-156-445(a) and (b) of the Ordinance. The Board directed that a notice of probable cause be sent to both the contributor and the committee. If the contributor and the committee had effected a refund of the excess amount contributed within 10 days of the Board’s notice, the Board would have dismissed the matter, per §2-156-445(d); or the contributor or committee could have attempted to rebut the Board’s probable cause determination.  At its December 2023 meeting, the Board considered the fact that the contributor provided evidence to the Board that had made a good faith effort to secure a refund of the excess amount of the contribution from the committee, that is, \$3,500, but received no response from the committee. The Board voted 5-0 to direct the committee to explain to the Board why it has not effected a refund of the excess amount contributed. The committee is subject to a penalty of the higher of \$5,000 or three times the amount of the excess contribution, pursuant to §2-156-465(b)(4).*  At its January 2024 meeting, the Board, having received no response from the candidate committee, voted 5-0 to fine the committee, Vallas for Mayor, three times (3x) the amount of the excess contribution, that is, \$10,500, pursuant to §2-156-465(b)(4).*

		*Note: on July 1, 2024, §2-156-465(b)(4) will be renumbered to §2-156-465(b)(5).
<b>23058.EO</b>	<b>Campaign Financing; Executive Orders</b>	<p>At its November 2023 meeting, the Board voted 4-0 to find probable cause that a registered lobbyist made a political contribution to the candidate committee of the Mayor, in apparent violation of Mayoral Executive Order 2011-2*. The Board directed that a notice of probable cause be sent to both the contributor and the committee. The lobbyist argued that the contribution came from an entity connected with the lobbyist, not the lobbyist personally. At its December 2023 meeting, the Board voted 5-0 to refer the matter to the IG for a factual investigation.</p> <p>At its May 2024 meeting, the Board voted 4-0 to close this matter for lack of jurisdiction, and to advise the IG accordingly. The Board's vote was based on an opinion from outside, independent counsel. That opinion is here:  <a href="https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf</a></p> <p>Note that the Board also voted 4-0, at its May 2024 meeting, to formally recommend to the Mayor and City Council that the substantive terms of the Executive Order be codified into law so that the Board can enforce it, and the IG can investigate potential violations of it where necessary. The Board's recommended amendment would prohibit not only lobbyists from contributing to the Mayor or the Mayor's political committee, but also prohibit any person or entity in which a lobbyist has a financial interest from making such contributions. It would also extend the prohibition on such contributions to all candidates for Mayor or their political committees.</p> <p>*See <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf</a></p>
<b>23060.EO</b>	<b>Campaign Financing; Executive Orders</b>	<p>At its December 2023 meeting, the Board voted 5-0 to find probable cause that a registered lobbyist violated Mayoral Executive Order 2011-2* by contributing to the candidate committee of the Mayor. The Board directed that a notice of probable cause be sent to both the contributor and the committee.</p> <p>At its April meeting, the Board, having received an opinion from outside, independent counsel, voted 5-0 to dismiss this matter for lack of jurisdiction to enforce this Mayoral Executive Order. That opinion is here:  <a href="https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf</a></p> <p>Note that the Board also voted 4-0, at its May 2024 meeting, to formally recommend to the Mayor and City Council that the substantive terms of the Executive Order be codified into law so that the Board can enforce it, and the IG can investigate potential violations of it where necessary. The Board's recommended amendment would prohibit not only lobbyists from contributing to the Mayor or the Mayor's political committee, but also prohibit any person or entity in which a lobbyist has a financial interest from</p>

		<p>making such contributions. It would also extend the prohibition on such contributions to all candidates for Mayor or their political committees.</p> <p>*See <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf</a></p>
<b>23061.EO</b>	<b>Campaign Financing; Executive Orders</b>	<p>At its December 2023 meeting, the Board voted 5-0 to find probable cause that a registered lobbyist violated Mayoral Executive Order 2011-2* by contributing to the candidate committee of the Mayor. The Board directed that a notice of probable cause be sent to the lobbyist.</p> <p>At its April meeting, the Board, having received an opinion from outside, independent counsel, voted 5-0 to dismiss this matter for lack of jurisdiction to enforce this Mayoral Executive Order. That opinion is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf</a></p> <p>Note that the Board also voted 4-0, at its May 2024 meeting, to formally recommend to the Mayor and City Council that the substantive terms of the Executive Order be codified into law so that the Board can enforce it, and the IG can investigate potential violations of it where necessary. The Board's recommended amendment would prohibit not only lobbyists from contributing to the Mayor or the Mayor's political committee, but also prohibit any person or entity in which a lobbyist has a financial interest from making such contributions. It would also extend the prohibition on such contributions to all candidates for Mayor or their political committees.</p> <p>*See <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf</a></p>
<b>23062.EO</b>	<b>Campaign Financing; Executive Orders</b>	<p>At its December 2023 meeting, the Board voted 5-0 to find probable cause that a registered lobbyist violated Mayoral Executive Order 2011-2* by contributing to the candidate committee of the Mayor. The Board directed that a notice of probable cause be sent to the lobbyist. The lobbyist's counsel submitted extensive written materials attempting to rebut the Board's probable cause finding.</p> <p>At its April meeting, the Board, having received an opinion from outside, independent counsel, voted 5-0 to dismiss this matter for lack of jurisdiction to enforce this Mayoral Executive Order. That opinion is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf</a></p> <p>Note that the Board also voted 4-0, at its May 2024 meeting, to formally recommend to the Mayor and City Council that the substantive terms of the Executive Order be codified into law so that the Board can enforce it, and the IG can investigate potential violations of it where necessary. The Board's recommended amendment would prohibit not only lobbyists from contributing to the Mayor or the Mayor's political committee, but also prohibit any person or entity in which a lobbyist has a financial interest from making such contributions. It would also extend the prohibition on such contributions to all candidates for Mayor or their political committees.</p>

		<p>* See <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf</a></p>
<p><b>23064.L</b> <b>23064.EO</b></p>	<p><b>Campaign Financing; Executive Orders</b></p> <p><b>Reports of Lobbying Activities</b></p>	<p>At its January 2024, the Board vote 5-0 to find probable cause that a registered lobbyist:</p> <p>(1) in Case 23064.L, failed to disclose, on their 3<sup>rd</sup> Quarter 2023 activity report, a political contribution made to a candidate for City elected office during that quarter. At its April 2024 meeting, the Board, having met with the subject and subject’s counsel, voted 5-0 to impose the minimum fine of \$500 for this violation on the subject, Joseph A. Moore. The fine was paid.</p> <p>(2) in Case 23064.EO, violated Mayoral Executive Order 2011-2* by contributing to the candidate committee of the Mayor. The lobbyist’s counsel submitted extensive written materials attempting to rebut the Board’s probable cause finding. At its April meeting, the Board, having received an opinion from outside, independent counsel, voted 5-0 to dismiss this matter for lack of jurisdiction to enforce this Mayoral Executive Order. That opinion is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/documents/Board%20Resolves%20Four%20Executive%20Order%20Cases%20Involving%20Political%20Contributions%20to%20the%20Mayor.pdf</a></p> <p>Note that the Board also voted 4-0, at its May 2024 meeting, to formally recommend to the Mayor and City Council that the substantive terms of the Executive Order be codified into law so that the Board can enforce it, and the IG can investigate potential violations of it where necessary. The Board’s recommended amendment would prohibit not only lobbyists from contributing to the Mayor or the Mayor’s political committee, but also prohibit any person or entity in which a lobbyist has a financial interest from making such contributions. It would also extend the prohibition on such contributions to all candidates for Mayor or their political committees.</p> <p>* See <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/Ordinances/ExecutiveOrders1_6.pdf</a></p>
<p><b>24011.C.1 – C.4</b></p>	<p><b>Aspirational Code of Conduct</b></p>	<p>At its June 10, 2024 meeting, the Board voted 4-0 to refer four (4) citizen complaints to the appropriate City Council Committee for any action deemed appropriate. The complaints relate to posts allegedly made to a City Council member’s personal, non-official social media site.</p>

June 11, 2024