

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

Note: LIG cases are shaded green and IG cases are shaded pink

Case Number-BOE [Case Number- Legislative Inspector General (LIG) or Inspector General (IG)]	Issue	Date Board Approved OR Disapproved LIG Petition to Commence Investigation	Date Board Found OR Denied Probable Cause; OR Dismissed Per LIG's Findings; OR Investigation Still Ongoing; OR Date Referred to Law Enforcement	Date of Probable Cause Meeting and Disposition status
12008.OLIG [2012OLIG0002]	Fiduciary Duty/abuse of City title	Approved February 2012	October 2012: Board considered subject's written submission and materials	December 2012: Board determined that employee violated Ordinance and recommended suspension; employee was suspended for 15 days without pay
12009.OLIG [2012OLIG0001]	Personnel Rules	Approved February 2012	September 2013: Board dismissed case after LIG found that complaint was not sustained	
12031.OLIG [2012OLIG0009] Alderman Proco Joe Moreno	City Property	Approved May 2012	September 2013 Found Probable Cause	Subject met with Board pursuant to §2-156-385 in March 2015; Alderman Moreno entered into a settlement agreement with the Board regarding the allegation that he engaged in the unauthorized use of City property by paying the maximum \$2,000 fine.
12032.OLIG [2012OLIG0004] Renumbered as Cases 15028.LIG.01-.08	City Property/ Staff Time records/ uncooperativeness with LIG investigation	Approved May 2012	May 2015: Uncooperativeness charges as to the original subject and seven (7) additional persons are not within the Board's jurisdiction and were referred to the Law Department and LIG for appropriate action.	

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12033.OLIG [2012OLIG0008]	Harassment	Approved June 2012	May 2015: LIG dismissed the matter without seeking probable cause	
12034.OLIG [2012OLIG0008.2]	Personnel Rules	Approved May 2012	September 2013: Board dismissed case after LIG found that complaint was not sustained	
12035.OLIG [2012OLIG0007]	No Permit for Office Remodeling Work	Approved June 2012	September 2014: Board found no probable cause and dismissed case, on the basis that the evidence did not show a possible ethics ordinance violation	
12036.OLIG [2012OLIG0018]	Bribery/Gifts	Approved July 2012	July 2012 Referred to Law Enforcement	
12037.OLIG [2012OLIG0010]	City Property	Approved June 2012	July 2012 Referred to Law Enforcement	
12052.OLIG [2012OLIG0003]	Political Activity	Approved August 2012	August 2014 Board Found Probable Cause	May 2015: Subject met with Board pursuant to §2-156-385, and Board dismissed the case, as the materials presented by the subject showed that there was no ethics ordinance violation.
12061.OLIG [2012OLIG0030]	Improper Influence	Approved October 2012	May 2015: LIG dismissed the matter without seeking probable cause	
12062.OLIG [2012OLIG0017]	Fiduciary Duty	Approved October 2012	September 2013 Board dismissed case after LIG found that complaint was not sustained	
13003.OLIG [2012OLIG0053]	Fiduciary Duty/Time Sheets	Approved January 2013	Investigation Still Ongoing	

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<b>13009.OLIG</b> <b>[2013OLIG0003]</b>	Fiduciary Duty	Approved March 2013	September 2013 Found Probable Cause	July 2014: Subject met with Board pursuant to §2-156-385, and Board dismissed the case, as the materials presented by the subject showed that there was no ethics ordinance violation.
<b>13010.OLIG</b> <b>[2012OLIG0006]</b>	Fiduciary Duty	Approved March 2013	March 2014: Board dismissed case after LIG found that complaint was not sustained	
<b>13011.OLIG</b> <b>[2012OLIG0014]</b>	Personnel Rules	Approved March 2013	July 2013: Board found there was no probable cause and dismissed the case, on the basis that the evidence did not show a possible violation of the Governmental Ethics Ordinance	
<b>13012.OLIG</b> <b>[2013OLIG0013]</b>	Fiduciary Duty/Residency	Approved March 2013	Investigation closed by LIG, September 24, 2015*	
<b>13013.OLIG</b> <b>[2013OLIG0002]</b>	Fiduciary Duty	Approved March 2013	Investigation closed by LIG, September 24, 2015*	
<b>13014.OLIG</b> <b>[2012OLIG0040]</b>	Fiduciary Duty	Approved March 2013	September 2013- Found Probable Cause	December 2014: Subject met with Board pursuant to §2-156-385, and Board dismissed the case, as the materials presented by the subject showed that there was no ethics ordinance violation.
<b>13015.OLIG</b> <b>[2012OLIG0043]</b>	Fiduciary Duty	Approved March 2013	Investigation Still Ongoing	
<b>13030.OLIG</b> <b>[2012OLIG0047]</b>	Fiduciary Duty	Approved June 2013	Investigation Still Ongoing	

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<b>13031.OLIG</b> <b>[2012OLIG0029]</b>	Fiduciary Duty	Approved June 2013	March 2014: Board dismissed case following LIG’s finding that complaint was not sustained	
<b>12039.OLIG/13044.A</b> <b>(OLIG)</b>	Campaign Financing	Board referred signed and sworn complaint to OLIG in July 2012; OLIG then referred case back to Board in August 2013; Board issued advisory opinion in September 2013	September 2013 Board issued advisory opinion that affiliated companies exceeded contribution limits in violation of the Ordinance, but had cured those violations	
<b>13035.OLIG</b> <b>[2012OLIG0006]</b>	Fiduciary Duty	Approved July 2013	Investigation closed by LIG, November 4, 2015*	
<b>13036.OLIG</b> <b>[2013OLIG0009]</b>	Fiduciary Duty	Approved July 2013	May 2015: LIG dismissed the matter without seeking probable cause	
<b>13039.OLIG</b> <b>[2013OLIG0027]</b> <b>Alderman Howard</b> <b>Brookins, Jr.</b>	Time records	Approved August 2013	November 2014- Found Probable Cause; Settlement offered but declined by the subject; Merits hearing held July 2017	September 2017: following a four (4) day merits hearing before an Administrative Law Judge, the Board received the judge’s final report and recommendations, then entered into a Settlement Agreement with the Alderman for the maximum fine for these violations of \$5,000. Uncooperativeness charges are not within the Board’s jurisdiction and were referred to the Law Department and LIG for appropriate action.
<b>13040.OLIG</b> <b>[2013OLIG0032]</b>	Personnel Rules	Approved August 2013	Investigation closed by LIG, November 13, 2015*	

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<b>13046.OLIG</b> <b>[2013OLIG0026]</b>	Fiduciary Duty	Approved September 2013	November 2014- Found Probable Cause	April 2015: Subject met with Board pursuant to §2-156-385, and Board dismissed the case, as the materials presented by the subject showed that there was no ethics ordinance violation.
<b>13050.OLIG</b> <b>[2013OLIG0047]</b>	Fiduciary Duty	Approved October 2013	Investigation Still Ongoing	
<b>13057.OLIG</b> <b>[2013OLIG0043]</b>	Campaign Financing	Approved November 2013	Investigation closed by LIG, November 13, 2015*	
<b>14009.OLIG</b> <b>[2014OLIG0014]</b>	City-owned property/Political Activity	Approved March 2014	Investigation Still Ongoing	
<b>14010.OLIG</b> <b>[2014OLIG0013]</b>	Fiduciary Duty/Improper Influence/Conflicts of Interest	Approved March 2014	Investigation closed by LIG, November 13, 2015*	
<b>14027.OLIG</b> <b>[2013OLIG0051 <i>et seq.</i>]</b>	Fiduciary Duty/Improper Influence/Conflicts of Interest/Contract Inducement/Political Solicitation	Approved July 2014	Investigation closed by LIG, May 8, 2015*	
<b>14028.OLIG</b> <b>[2013OLIG0053]</b>	Aldermanic Expense Allowance/Time Records/Prohibited Political Activities/Political Solicitations	Approved July 2014	Investigation closed by LIG, November 13, 2015*	
<b>14029.OLIG</b> <b>[2014OLIG0046]</b>	Fiduciary Duty/ Time Records/Prohibited Political Activities	Approved July 2014	Investigation closed by LIG, February 20, 2015*	
<b>141272.OLIG</b> <b>[2014OLIG0039]</b>	Fiduciary Duty	Approved November 2014	Investigation Still Ongoing	

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<b>141273.OLIG</b> <b>[2014OLIG0049]</b> <b>(Board had referred signed and sworn complaint to LIG in March 2014)</b>	Fiduciary Duty/Improper Influence/Conflicts of Interest/Campaign Financing	Disapproved November 2014, on the basis that the matter did not involve even a possible ethics ordinance violation		
<b>141274.OLIG</b> <b>[2014OLIG0029]</b>	Fiduciary Duty/Improper Influence/Time Records	Approved November 2014	Investigation closed by LIG, November 4, 2015*	
<b>141275.OLIG</b> <b>[2014OLIG0044]</b>	Fiduciary Duty/Time Records	Approved November 2014	Investigation closed by IG*	
<b>141276.OLIG</b> <b>[2014OLIG0078]</b>	Fiduciary Duty	Approved November 2014	Investigation closed by IG*	
<b>141281.OLIG</b> <b>[2014OLIG0056]</b>	Fiduciary Duty/Political Activity	Approved November 2014	Investigation Still Ongoing	
<b>141282.OLIG</b> <b>[2014OLIG0092]</b>	Political Activity	Approved December 2014	Investigation closed by LIG, November 12, 2015*	
<b>141284.IG</b> <b>[IG docket # 10-0922]</b>	Post-Employment	N/A	January 2015 Board found Probable Cause	In April 2015 the subject met with Board pursuant to §2-156-385, and by a unanimous vote, the Board dismissed the case, as the materials presented by the subject showed that there was no ethics ordinance violation.
<b>15016.OLIG</b> <b>[2015OLIG0002;</b> <b>2015OLIG0006]</b>	Aspirational Code of Conduct; Fiduciary Duty; Conflicts of Interests	Approved March 2015	Investigation closed by IG*	
<b>15017.OLIG</b> <b>[2015OLIG0022]</b>	Political Activity; Campaign Financing	Approved March 2015	Investigation Still Ongoing	

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<b>15018.OLIG</b> <b>[2014OLIG00018]</b>	Fiduciary Duty; Improper Influence; Conflicts of Interest; Interest in City Business; Political Activity; Gifts	Approved March 2015	Investigation closed by IG*	
<b>15023.OLIG</b> <b>[2015 OLIG0019]</b>	Campaign Financing	Approved May 2015	Investigation closed by LIG, October 28, 2015*	
<b>15030.LIG</b> <b>[2014OLIG0028]</b>	Campaign Financing	Approved May 2015	Investigation Still Ongoing	
<b>15036.LIG</b> <b>[2015OLIG0044]</b>	Political Activity	Approved June 2015	Investigation closed by LIG, November 12, 2015*	
<b>151689.LIG</b> <b>[2015OLIG0016]</b>	City-owned Property; Prohibited Political Activities	Approved October 2015	Investigation closed by LIG, November 10, 2015*	
<b>151693.LIG</b> <b>[2015OLIG0085]</b>	Representation of other Persons	Approved October 2015	Investigation closed by IG*	
<b>151695.IG</b> <b>[IG docket # 14-0338],</b> <b>Michael Acciari</b>	Statements of Financial Interests	N/A	January 2016 Board found probable cause.	In April 2016, Mr. Acciari entered into a settlement agreement with the Board regarding the allegation that he knowingly failed to disclose on his 2014 Statement of Financial Interests that his spouse received compensation for services from a person doing business with the City, by paying the maximum \$2,000 fine.  To read the agreement, see this: <a href="https://www.chicago.gov/content/city/en/depts/ethics/prov">https://www.chicago.gov/content/city/en/depts/ethics/prov</a>

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				<a href="https://www.chicago.gov/content/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html">drs/reg/svcs/SettlementAgreements.html</a>
<b>17023.IG</b> <b>[IG docket # 15-0532]</b> <b>Evelyn Diaz</b>	Prohibited Conduct	N/A	Petition for a probable cause finding filed by IG on May 27, 2017. On June 13, 2017, the Board made a finding of probable cause	September 8, 2017: the Board settled the matter with Ms. Diaz for a \$1,500 fine.  To read the agreement, see this: <a href="https://www.chicago.gov/content/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html">https://www.chicago.gov/content/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html</a>
<b>17024.IG</b> <b>[IG docket # 14-0345]</b>	Financial Interest in City Business; Statements of Financial Interests	N/A	A petition for a probable cause finding was filed by IG on May 27, 2017.  The Board made a preliminary finding of probable cause at its September 2017 meeting. A meeting with the subject and the subject’s legal representative was held on February 26, 2018.	At its March 15, 2018 meeting, the Board voted 5-0 to dismiss the case, on the basis that the IG’s investigation had not been completed within 2 years, as required by §2-56-050(b)(3). The Board also determined, after examining the IG’s investigative file in depth, that the IG failed to present evidence sufficient to warrant a Board conclusion that the subject took affirmative action to conceal evidence, which, if shown, could have justified tolling or extending the two-year investigation completion deadline.  However, the Board also voted to request clarification



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				from the departments involved in the contract, on the basis that, the investigation’s dismissal notwithstanding, the facts cause concern that a City contract may be in violation of the Ordinance, and thus a waiver or sole source contract may be appropriate.
<b>18012.IG.1</b> <b>[IG docket # 16-0240]</b> <b>William Burns</b>  <b>18012.IG.2</b> <b>Airbnb</b>	Post-employment restrictions on lobbying; Prohibited Conduct	N/A	<p>At its May 23, 2018 meeting, the Board found probable cause as to one conclusion made by the IG (namely, that a former City elected official engaged in lobbying after leaving City service during the time the official was prohibited from doing so) but found no probable cause and dismissed another IG conclusion (namely, that the former elected official knowingly negotiated the possibility of future employment with a persons that had a matter currently before the official) because there was insufficient evidence in the record to warrant a finding of probable cause.</p> <p>The matter involving Mr. Burns was settled by agreement approved in January 2019. At that time, the Board found that</p>	<p>At its January 2019 meeting, the Board approved a settlement agreement with Mr. Burns for \$5,000. The agreement is posted here: <a href="https://www.chicago.gov/content/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html">https://www.chicago.gov/content/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html</a></p> <p>The Board also voted to find probable cause to conclude that Mr. Burns’s employer, Airbnb, violated the Ordinance by employing or retaining an unregistered lobbyist, and to notify the person of that finding. The Board settled the matter with Airbnb for the maximum \$2,000 fine. This settlement agreement is posted here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/ge">https://www.chicago.gov/content/dam/city/depts/ethics/ge</a></p>

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			there is probable cause to conclude that the person who employed or retained him also thereby violated the Ordinance. That is Case No. 18012.IG.2.	<a href="http://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/18012.2IG-AirBB.pdf">neral/SettlementAgreements/18012.2IG-AirBB.pdf</a>
<b>18018.IG</b> <b>[IG docket # 16-0222]</b> <b>Karen Rittorno</b>	Financial Interest in City Business	N/A	<p>The IG delivered a completed ethics investigation to the Board on May 25, 2018. The matter involves a City employee who had an ownership interest in a company with a City sub-contract, thus an apparent financial interest in work, contracts, or business of the City, in violation of the Ordinance.</p> <p>At its July 2018 meeting, the Board found that there is probable cause to conclude that the employee violated the Ordinance.</p> <p>At its October 2018 meeting, the Board met with the subject and her attorney, and voted to sustain its finding of probable cause and pursue and public settlement of the matter for an \$8,000 fine and admission that the subject violated the Ordinance in six (6) successive years.</p>	<p>At its December 2018 meeting, the Board approved a settlement agreement in this matter and imposed an \$8,000 fine and advised the Law Department that it has the authority to maintain an action for an accounting for pecuniary benefits received by the subject. The settlement agreement is posted here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_InterestCityBusiness/18018.IG.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/AO_InterestCityBusiness/18018.IG.pdf</a></p>
<b>18023.IG.1</b> <b>[IG docket # 17-0148]</b>	Gifts;	N/A	After settling the matter with Mr. Olvera, the Board voted to	The Board met with the subject and the subject's

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<b>Arthur Olvera</b>  <b>18023.IG.2</b> <b>John McGuire</b>	Statements of Financial Interests		<p>proceed with a probable cause finding against the person who offered him the prohibited gift. This is Case No. 18023.IG.2.</p>	<p>attorney in December 2018. After the meeting, the Board voted 5-0 to sustain its probable cause finding and to forward a settlement offer of a \$500 fine.</p> <p>The Board approved a Settlement Agreement with Mr. Olvera, posted here: <a href="https://www.chicago.gov/content/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html">https://www.chicago.gov/content/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html</a></p> <p>The Board met with the gift-giver in this case and his attorney on May 14, 2019, and then voted 4-0 that he violated the Ordinance, but voted 3-1 to pursue a fine for the minimum amount for this kind of violation (\$1,001); the dissenting Board member voted for no fine.</p> <p>The settlement with the gift-giver, John McGuire, is posted here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/18023.IG.2.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/18023.IG.2.pdf</a></p>
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<b>18039.IG</b> <b>[IG Docket # 17-0082]</b>	Gifts; Use of City-owned Property	N/A	The IG delivered this case to the Board on November 30, 2018. It involves allegations that a City employee, and another, now-former employee, each violated the Ordinance’s gift restrictions by knowingly accepting prohibited gifts from a City contractor, and that the contractor violated the Ordinance by providing these gifts, and that now-former employee approved payment vouchers for the employee’s own travel paid by a vendor, in violation of the Use of City-owned property provision.	<p>At its February 2019 meeting, the Board determined, by a 4-0 vote, that the violations committed by the current City employee and the person that gave him dinners at which seminars on topics pertinent to his job were held, were minor, and to issue confidential letters of admonition to the employee and person. The dinners would have qualified as educational meetings, and would have been approved by the Board (and the employee would have needed to report them to the Board within 10 days after each event) had the employee sought the Board’s approval to attend them in the first place.</p> <p>The Board also determined, by the same vote, that there is probable cause to conclude that the former City employee violated the Ordinance’s gift and use of City-owned property provisions. The Board met with the subject meeting in June 2019, and at its July 2019 meeting, voted 4-0 that the (now-former) employee committed a minor</p>
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				violation by failing to seek and receive the Board’s approval to attend these meetings, some of which were held downstate. By the same vote the Board dismissed the matter regarding approvals of the travel, because the contract at issue contemplated the travel, and the now-former employee had received approval for these trips from a supervisor.
<b>19029.IG</b> <b>[IG docket # 17-0486]</b> <b>Thomas Wagner</b>	Post-employment; Confidential information; Conflicts of interest; appearance of impropriety	N/A	The Board made a preliminary finding of probable cause at its October 2019 meeting.	This case was delivered to the Board by IG on September 4, 2019. The IG’s investigation found that a City employee exercised contract management authority over a City contract by drafting a Request for Proposals (RFP) while negotiating and securing post-City employment with a company that responded to the RFP and was eventually awarded the contract, then, after retiring from City employment, was actively involved in the contract as an employee of the company that was awarded the contract both before and after the City officially

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				<p>awarded the contract to his post-City employer.</p> <p>The Board made a preliminary finding of probable cause at its October 2019 meeting. The parties will discuss resolving this matter by a fine.</p> <p>The respondent and his attorney met with the Board on July 13, 2020. At the meeting, the Board determined that the respondent had committed four (4) Ordinance violations (two (2) of the post-employment provisions—but the vote on the permanent prohibition’s violation was 3-1, with one Board member dissenting on the basis that there was no such violation); and one (1) each of the prohibited conduct and conflict of interests provisions, via 4-0 votes), but imposed the minimum fine of \$500 for each violation, for a total fine of \$2,000. The Board determined that the former employee committed four (4) Ordinance violations (two (2) of the post-</p>
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				<p>employment restrictions—but the vote on the permanent prohibition’s violation was 3-1, with one Board member dissenting on the basis that there was no such violation); and one (1) each of the prohibited conduct and conflict of interests provisions, via 4-0 votes).</p> <p>However, applying its powers of equity, the Board imposed the minimum fine of \$500 for each violation, for a total fine of \$2,000. The Board’s rationale for imposing the minimum fine was that the respondent’s former City colleagues asked for his assistance.</p> <p>The matter was concluded with a Settlement Agreement which you can read here: <a href="https://www.chicago.gov/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html">https://www.chicago.gov/city/en/depts/ethics/provdrs/reg/svcs/SettlementAgreements.html</a></p> <p>Note: the IG’s investigation was based on a 2017 complaint filed with the Board’s Executive Director, which he then immediately</p>
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				referred to the IG for investigation.
<b>19035.IG</b> <b>[IG docket # 17-0632]</b>	Unauthorized use of City property; Prohibited political activity	N/A		<p>On October 31, 2019, the IG delivered to the Board a completed investigation of an alderman. The IG requested that the Board make a finding of probable cause to conclude that the alderman had violated two sections of the Ordinance: (i) §2-156-060, by allowing a non-City employee to operate equipment the alderman had purchased with City funds from the aldermanic expense allowance; and (ii) §2-156-135(b), by directing City staff to place a sign on the equipment that stated “[Name and title of State elected official associated with Alderman/Alderman’s name/Office phone #].”</p> <p>The Board reviewed the investigative file, which showed : (i) a first anonymous complaint alleging violations of the Ordinance, received on October 18, 2017, and a second anonymous complaint, received on December 20, 2017, alleging that a City department head</p>



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				<p>had discussed the matter with the alderman; and (ii) that the IG did not have a written complaint signed by the complainant (an employee of the IG) until July 9, 2019, approximately 18 months after it first began investigating, despite the requirement in §2-56-045(a), in effect until September 27, 2019, that the IG “may not undertake an investigation of any alderman except pursuant to a complaint that (1) names the alderman; and (2) states the facts underlying the complaint; and (3) is signed by the person making the complaint. A city officer or city employee may be a signatory to a complaint.”</p> <p>The Board took two votes at its December 6, 2019 meeting.</p> <p>First, by a vote of 3-1, it dismissed the complaint for lack of jurisdiction in that the IG did not have a proper complaint on file until 18 months after it commenced investigating, and evidence gathered after the complaint</p>
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				<p>was signed was inextricably intertwined with evidence gathered before the complaint was properly filed and was insufficient to warrant a probable cause finding that either provision of the Ordinance could have been violated. Thus the Board dismissed the matter.</p> <p>Second, by a vote of 4-0, the Board directed its staff to send the alderman a letter of advisement that the equipment be operated solely by a City employee, and that this be implemented as soon as practicable.</p> <p>While the Board could not reach the issue of whether the signage on the equipment constituted “intentiona[l] misappropriat[ion] of any property or resources of the city in connection with any prohibited political activity,” concerns were raised that the signage merely identified the elected officials[s] who provide constituent services and did not constitute a “campaign sign or campaign material on behalf of any</p>
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				candidate for elective office,” per the definition of “prohibited political activity” in §2-156-010(v-1)(11).
<b>20005.IG</b> <b>[IG docket # 19-1202]</b> <b>William Helm</b>	Statements of Financial Interests	N/A	The Board made a preliminary finding of probable cause at its May 2020 meeting.	<p>In November 2019, the Board requested an investigation of a former Deputy Commissioner in the Department of Aviation. This request was based on media accounts that Helm had derived income from outside employment in excess of \$1,000 per year for several years. His filed Statements of Financial Interests disclosed no such outside employment or sources of outside income.</p> <p>On February 11, 2020, the IG delivered to the Board a completed investigative report, requesting that the Board find that there is probable cause to conclude that the respondent violated §2-156-160(a)(1) by knowingly filing false or misleading Statements of Financial Interests in 2018 and 2019, by failing to disclose income received in excess of \$1,000 in 2017 and 2018.</p>

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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				<p>After the respondent and his attorney presented the Board with a written response to the probable cause finding, the Board determined, at its July 13, 2020 meeting, that the respondent committed two (2) Ordinance violations by knowingly failing to disclose outside income on his 2018 and 2019 Statements of Financial Interests. The Board imposed the maximum fine of \$2,000 for each violation, for total fines of \$4,000.</p> <p>At the Board’s August 2020 meeting, it finalized the violation. The respondent failed to pay the fine within 35 days, so the Board referred the matter to the Law Department for collection.</p>
<b>21006.IG</b> <b>[IG docket # 19-0605]</b> <b>John LaGiglia</b>	Financial Interest in City business	N/A		<p>A completed IG investigation was delivered to the Board on January 22, 2021. At its February 8, 2021 meeting, the Board voted unanimously to make a preliminary finding that there is probable cause to conclude that the subject, a City employee, had a prohibited financial interest</p>

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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				in a subcontract in 2017 by virtue of owning a company that entered into that subcontract with a company to do work contracted by the Public Building Commission, as that subcontract, and the prime contract, were paid with funds belonging to or administered by the City. The Board considered mitigating factors that the employee’s counsel clarified the Ordinance’s restrictions as soon as possible and the employee instituted changes to ensure this type of violation does not recur. The Board and the subject agreed to end the matter for the minimum fine of \$500. Here is the full text of this agreement: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/21006.IG.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/21006.IG.pdf</a>
<b>21027.IG</b> <b>[IG docket # 20-1282]</b> <b>Jay Doherty</b>	Unregistered lobbying	N/A	On August 13, 2021, the IG delivered to the Board a completed investigation of a formerly registered lobbyist, Jay Doherty. The IG requested that the Board find probable cause that the individual lobbied on	

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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>three (3) occasions on behalf of entities for which the individual had not registered, and that on four (4) occasions lobbied but failed to properly report that activity as required in the quarterly activity reports.</p> <p>At its September 2021 meeting, the Board determined by a 4-0 vote that there is probable cause to conclude that the individual may have violated the Ordinance by lobbying for three (3) clients for which he was not registered, and never registered, even though he was registered on behalf of other clients during these years. The Board did not find probable cause to conclude that the lobbyist failed to file activity reports for these activities.</p> <p>The respondent was entitled to meet with the Board to attempt to rebut the Board’s probable cause findings, pursuant to §2-156-385, and was notified that, if no response was received, the Board would make a final determination that Mr. Doherty violated the Ordinance on three occasions. The Board received no response from the respondent or the attorney he had used in the IG</p>	
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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>investigation. Accordingly, the Board determined that Mr. Doherty violated the Ordinance on three separate occasions by lobbying City employees and assessed a \$75,000 fine; fines would have totaled in excess of \$2 million on their face, given the dates of the unregistered lobbying, in 2015 and 2019.</p> <p>On November 1, 2021, respondent petitioned the Board to reconsider its determination and fine, pursuant to §2-156-396. At its November 15 meeting, the Board voted 5-0 (Chair William Conlon recusing) to deny the petition, on the basis that no newly discovered facts were presented.</p> <p>In December 2021, the respondent again petitioned the Board to reconsider its determination, this time the amount of its fine. The Board considered this petition at its January 2022 meeting, but voted 4-0 to deny it, as it was defective under §2-156-396, and because the respondent did not respond to the Board’s multiple entreaties inviting respondent to a hearing, even to request an extension.</p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			The respondent has the right to challenge the Board’s determinations in court.	
<b>21035.IG</b> <b>[IG docket # 21-1900]</b>	Statements of Financial Interests; Conflicts of Interests; Appearance of Impropriety	N/A	The IG referred this matter to the Board on October 28, 2021. It involves allegations that a City appointed official failed to disclose a financial interest pending before the City, per §2-156-080(c). On November 15, 2021, the Board voted unanimously to refer the matter back to the IG for further investigation, as the facts show that there may have been one or more Ordinance violations, but not of the provision cited by the IG, but rather of §2-156-160, which governs the annual filing of Statements of Financial Interests.	
<b>23041.IG</b> <b>[IG docket # 23-0000000023]</b>	Fiduciary Duty; Unauthorized use of City property; Prohibited political activities; Solicitation or acceptance of political contributions and membership on political fundraising committees	N/A	The IG referred this matter to the Board on May 1, 2023. It involves allegations that an elected City official was responsible for the unauthorized use of City property for prohibited political activity, for violation of the official’s fiduciary duty, and for the solicitation of political contributions in violation of several sections of the Ordinance,	



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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			including §§2-156-020, -060, -135(b), and -140(a). At its May 22, 2023 meeting, the Board voted unanimously to find probable cause that the official violated these sections of the Ordinance. The subject and subject’s counsel met with the Board at its September and October 2023 meetings to attempt to rebut the Board’s finding. At its November 13 meeting, the Board voted 4-0 to dismiss the matter on the basis that the factual record before it, including the evidence submitted by both the IG and official, was insufficient to warrant a finding that the official violated these Ordinance sections. Three Board members joined in this opinion; a fourth member issued their own opinion, concurring with the result but for different reasons. These opinions are posted here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/Publications/23041.ig.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/Publications/23041.ig.pdf</a>	
<b>23043.IG</b> <b>[IG docket # 22-000043133]</b>	Offering, receiving and soliciting of gifts and favors	N/A	The IG referred this matter to the Board on May 10, 2023. It involves allegations that a building owner bribed a building	

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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>inspector during an inspection conducted in August 2021, by placing cash in the inspector’s shirt. The inspector refused the money and together with the Department of Buildings filed a complaint with the IG.</p> <p>At is May 22, 2023 meeting, the Board voted unanimously to find probable cause that the building owner violated §2-156-142(c) of the Ordinance, which provides that “no person shall offer, with the intent to violate, or make a gift that violates this section.”</p> <p>The subject met with the Board at its August 2023 meeting to attempt to rebut the Board’s finding. The Board voted 5-0 to refer the matter back to the IG for further investigation, per §2-156-380(h-1).</p> <p>The IG then submitted its supplemental investigative report to the Board on October 18, 2023. After reviewing it, the Board voted 4-0 at its November 2023 meeting to invite the subject to meet with the Board to attempt to rebut the IG’s supplemental findings.</p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>The IG then submitted its supplemental investigative report to the Board on October 18, 2023. After reviewing it, the Board voted 4-0 at its November 2023 meeting to invite the subject to meet with the Board to attempt to rebut the IG’s supplemental findings. The subject met with the Board at its December 2023 meeting. Following that meeting, the Board voted 5-0 to dismiss the matter, as the evidence did not support a finding that the subject attempted to place cash in the building inspector’s shirt.</p>	
<p><b>23045.IG</b>  <b>[IG docket # 22-000041401]</b></p>	<p>Fiduciary duty;          Unauthorized use of City property</p>	<p>N/A</p>	<p>The IG referred this matter to the Board on June 6, 2023. It involves allegations that a City official misused City staff and resources for personal, non-official purposes, in violation of §§2-156-020 (Fiduciary duty) - 060 (Unauthorized use of City property) of the Ordinance.</p> <p>At its June 12, 2023 meeting, the Board voted unanimously to find probable cause that the official violated these sections of the Ordinance. The subject and subject’s counsel met with the Board at its August, September, and October 2023 meetings to attempt to rebut the Board’s</p>	

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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>finding. At its October 16 meeting, the Board voted 5-0 that the official committed five (5) violations each of these two provisions, and voted to impose the maximum fine of \$20,000--\$2,000 per violation.</p> <p>At its November 2023 meeting, the Board voted 4-0 to pursue an action before an administrative law judge, pursuant to §2-156-392 of the Ordinance, as the matter was not settled, and the subject has not paid the fine.</p> <p>The matter was referred to the Law Department for the drafting of charges, and to the Department of Administrative Hearings, which appointed an Administrative Law Judge to hear the matter in a confidential proceeding pursuant to §2-156-392. The proceeding has been ongoing since November 2024.</p>	
<b>23050.IG</b> <b>[IG docket # C2022-000042869]</b> <b>Ioannis Fegos</b>	Offering, receiving, and soliciting of gifts and favors	N/A	<p>The IG referred this matter to the Board on August 17, 2023. It involves allegations that a restaurant employee attempted to bribe an inspector from the City’s Department of Public Health by slipping an envelope containing a restaurant gift card and a \$100 into the inspector’s pocket—but</p>	

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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>the inspector refused to accept them and immediately returned them to the restaurant. At its September 11 meeting, the Board voted unanimously to find probable cause that the restaurant employee violated §2-156-142(c) of the Ordinance, which provides that “no person shall offer, with the intent to violate, or make a gift that violates this section.”</p> <p>The subject’s counsel met the Board at its November 2023 meeting to attempt to rebut the Board’s finding. After that meeting, the Board voted 4-0 to determine that the subject violated §2-156-142(c) of the Ordinance, and to impose the maximum fine: \$5,000.</p> <p>At its December 2023 meeting, the Board voted 4-0 to pursue an action before an administrative law judge, pursuant to §2-156-392 of the Ordinance, as the matter was not settled and the subject has not paid the fine. The matter was referred to the Law Department for the drafting of charges, and to the Department of Administrative Hearings, which appointed an Administrative Law Judge to hear the matter in a</p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>confidential proceeding pursuant to §2-156-392.</p> <p>At the Board’s January 2024 meeting, the Board voted 5-0 to reject the subject’s offer to settle the matter for a \$1,250 fine, and to proceed to an administrative hearing to collect the maximum fine: \$5,000.</p> <p>At its April 2024 meeting, the Board vote 5-0 to direct the City’s specially hired counsel to offer terms of settlement agreeable to the Board.</p> <p>At its May 2024 meeting, the Board voted 4-0 to reject the settlement terms proffered by the subject (through the subject’s attorney), and to pursue the matter in an administrative hearing or enable the subject to pay the fine on terms previously offered by the Board.</p> <p>The subject then agreed to pay the fine, and final terms were agreed on. The agreement is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/23050.IG.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/23050.IG.pdf</a></p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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<b>23053.IG</b> <b>[IG docket # C2022-000041400]</b> <b>Joe Haughey</b>	Offering, receiving, and soliciting of gifts and favors	N/A	<p>This matter was referred to the Board by the IG on October 13, 2023. It involves allegations that an employee of a company that supplies materials to several City vendors delivered holiday gifts to the home of a City employee, in violation of §2-156-142(c) of the Ordinance. That section that “no person shall offer, with the intent to violate, or make a gift that violates this section.”</p> <p>The employee and their supervisor contacted the Board immediately after the gift was returned, and the Board advised them to turn the matter over to the IG. The Board thanks the employee, their supervisor, and the IG, for the conscientious manner this matter was handled. At is November 2023 meeting, the Board voted 4-0 to determine there is probable cause to conclude the subject violated §2-156-142(c) of the Ordinance.</p> <p>The subject’s counsel met with the Board at its February 2024 meeting to attempt to rebut the Board’s probable cause finding. After that meeting, the Board</p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>voted 4-0 to find that the subject violated the Ordinance by giving prohibited gifts to the City employee and to impose the minimum fine of \$1,001.</p> <p>The subject paid the fine.</p>	
<p><b>23054.IG</b>  <b>[IG docket # C2022-000041814]</b></p>	Whistleblower protection	N/A	<p>This matter was referred to the Board by the IG on October 16, 2023. After its investigation, the IG petitioned the Board to find probable cause to conclude that a City official wrongfully terminated the employment of two (2) City employees, in violation of §2-156-019 of the Ordinance.</p> <p>At its November 2023 meeting, the Board voted 4-0 to determine there is probable cause to conclude that the official violated §2-156-019 of the Ordinance by wrongfully terminating the employees.</p> <p>The subject’s counsel met with the Board at its February 2024 meeting to attempt to rebut the Board’s probable cause finding. At the Board’s April 2024 meeting, the Board voted 5-0 to seek further clarification from the IG, pursuant to §2-156-380(h-1),</p>	



**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>and to continue the matter to its May meeting.</p> <p>At the Board’s May 2024 meeting, the Board, having analyzed the further clarification provided by the IG, voted 4-0 to find that the subject committed two (2) violations of §2-156-019(b) and to assess the maximum \$5,000 fine for each violation.</p> <p>The Board rejected an offer to settle the matter made by the subject. At its June 2024 meeting, the Board voted to pursue the fines, totaling \$10,000 through a confidential administrative hearing, pursuant to §2-156-392 of the Ordinance. The City has appointed counsel to represent it, and the Department of Administrative Hearings has appointed an Administrative Law Judge to hear the matter.</p>	
<p><b>23055.IG</b>  <b>[IG docket # C2022-000042213]</b></p>	<p>Fiduciary duty;          Unauthorized use of City property; Prohibited political activities</p>	<p>N/A</p>	<p>This matter was referred to the Board by the IG on October 16, 2023. After its investigation, the IG petitioned the Board to find probable cause that a City official misappropriated City resources for political and otherwise unauthorized purposes, in</p>	

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>violation of §§2-156-020, -060, and -135 of the Ordinance, arising out of the official’s appearance at church services where the official engaged in partisan political activities but used City resources and property in the course of and to in preparation for those services.</p> <p>At its November 2023 meeting, the Board voted 4-0 to determine there is probable cause to conclude that the official violated these Ordinance sections on multiple occasions.</p> <p>The subject’s counsel met with the Board at its February 2024 meeting to attempt to rebut the Board’s probable cause finding, and submitted extensive written materials attempting to rebut the Board’s finding. After that meeting, the Board sought further clarification from the IG and the subject, and received further written materials from the subject and IG.</p> <p>At the April 2024 meeting, the Board, having considered the entire record before it, voted 5-0 to find that the subject committed 12 violations of the Ordinance –</p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>four violations each of §§2-156-020, -060, and -135, and to pursue a fine of \$60,000 – assessing the maximum fine of \$5,000 for each violation.</p> <p>At its June 2024 meeting, the Board voted to reject the settlement offer made by the subject and proceed to a confidential administrative hearing, pursuant to §2-156-392 of the Ordinance, in order to collect the \$60,000 fine.</p> <p>The City has appointed counsel to represent it, and the Department of Administrative Hearings has appointed an Administrative Law Judge to hear the matter.</p>	
<p><b>Case No. 23059.IG</b>  <b>[IG docket # C2022-000043794]</b>  <b>Paul Smola</b></p>	<p>Offering, receiving, and soliciting of gifts and favors</p>	<p>N/A</p>	<p>After an investigation, the IG referred this matter to the Board on November 14, 2023. It petitioned the Board to find probable cause to conclude that a business owner gave a prohibited gift of cash to an inspector from the Department of Buildings during an inspection.</p> <p>At its December 2023 meeting, the Board voted 5-0 to determine that there is probable cause to conclude that the business owner</p>	

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>violated §2-156-142(c) of the Ordinance, which provides that “no person shall offer, with the intent to violate, or make a gift that violates this section.”</p> <p>The subject met with the Board at its February 2024 meeting; after that meeting the Board voted 4-0 to find the subject in violation of the Ordinance and imposed a fine of \$2,000. The subject is paying the fine.</p>	
<p><b>Case No. 23063.IG</b>  <b>[IG docket # C2022-000043299]</b></p>	<p>(Prohibited) financial interest in city business</p>	<p>N/A</p>	<p>After an investigation, the IG referred this matter to the Board on November 20, 2023. It petitioned the Board to find probable cause that a City employee received in excess of \$1,000 in City funds as compensation for contracting work performed by a company owned by the employee, in violation of §2-156-110(a) of the Ordinance. That section prohibits City employees and elected officials from having a “financial interest” (defined as an ownership interest in one’s own name or in the name of another, such as a company one owns worth more than \$1,000 in a calendar year) in any City contract, work or business of the City.</p>	

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>At its December 2023 meeting, the Board voted 5-0 to determine there is probable cause to conclude that the employee violated that Ordinance provision. The employee and their union representative met with the Board at its February 2024 meeting. After that meeting, the Board voted 4-0 to find that the employee had committed a minor violation of the Ordinance, and sent a confidential letter to the employee advising them of the prohibition on having a financial interest in any City contract, work, or business—and that an employee’s spouse could have a financial interest in City business only if it is through the spouse’s “independent occupation, business, or profession,” which was not the case here.</p> <p>Should the employee repeat this type of violation, the violation would not be considered minor.</p>	
<b>23065.IG</b> <b>[IG docket # C2022-000044076]</b>	Unauthorized use of City property; Prohibited political activities	N/A	<p>After its investigation, the IG referred the matter to the Board on December 18, 2023, and petitioned the Board to find probable cause that a City employee violated §2-156-060 of</p>	

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>the Ordinance. The employee was a candidate for elected City office in 2023, and campaigned in their City uniform, and authorized photos of themselves to be used for their campaign social media accounts.</p> <p>At its January 2024, meeting, the Board voted 5-0 to find that the subject had committed a minor violation of the Ordinance. If the conduct is repeated, the violation will not be considered minor.</p>	
<p><b>23066.IG</b>  <b>[IG docket # C2022-000043298]</b>  <b>Patrick Lavelle</b></p>	<p>Statements of Financial Interests</p>	<p>N/A</p>	<p>After its investigation, the IG referred the matter to the Board on December 26, 2023, and petitioned the Board to find probable cause that the subject, a City employee, violated §2-156-160(a)(1) of the Ordinance for failing to disclose, on their 2020 and 2021 Statement of Financial Interests, income received in excess of \$1,000 from a company of which the City employee was the sole employee.</p> <p>Because the employee’s 2023 Statement of Financial Interests was filed after the subject was interviewed by the IG, but the facts showed that there was a failure to make this disclosure on that form, the Board voted to find</p>	

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>probable cause that the subject committed three (3) violations of the Ordinance. The subject’s counsel submitted written materials to the Board in an attempt to rebut the Board’s probable cause finding.</p> <p>At its April 2024 meeting, the Board voted 5-0 to determine that the subject violated the Ordinance by failing to disclose income received on their 2020, 2021, and 2023 Statement of Financial Interests, and to pursue a fine of \$4,000--\$1,000 for the 2020 and 2021 violations, and \$2,000 for the 2023 violation, which occurred after the subject’s interview with the IG as to these two previous failures to disclose.</p> <p>At its May 2024 meeting, the Board voted 4-0 to accept a payment plan whereby the subject will pay the \$4,000 fine. The agreement is posted here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/23066.IG.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/23066.IG.pdf</a></p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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<b>23067.IG.01</b> <b>Christopher King</b>  <b>23067.IG.02</b>  <b>23067.IG.03</b> <b>Steven Clay</b>  <b>23067.IG.04</b>  <b>[IG docket # C2022-000043881]</b>	(Prohibited) Financial interest in city business; Duty to report corrupt or unlawful activity	N/A	<p>After its investigation, the IG referred this matter to the Board on December 30, 2023, and petitioned the Board for a probable cause finding.</p> <p>The matter involves three (3) employees from the same City department; the IG concluded that one of them had a prohibited financial interest in City contracts, in violation of §2-156-110(a), and that the others knew of this violation but failed to report the unlawful activity to the IG as required by §2-156-018(a).</p> <p>At its January 2024 meeting, the Board voted 5-0 to refer the matter back to the IG, because the evidence adduced in the IG’s investigation appears to show that a <i>fourth</i> employee from the same department also violated §2-156-018(a) by failing to report the violation to the IG. The Board requested that the IG review its investigation, and, if it appropriate, to properly petition the Board for a probable cause finding with respect to that fourth employee.</p> <p>The IG then reviewed its investigation, and petitioned the</p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>Board for a probable cause finding as to the fourth employee.</p> <p>At its May 2024 meeting, the Board voted 4-0 to find probable cause that all four employees violated various provisions of the Ordinance: the first, for having a prohibited financial interest in City business by owning a company that was a contractor to the employee’s department (in violation of §2-156-110); the other three, as having failed to report the unlawful activity to the IG as required by §2-156-018(a).</p> <p>Three subjects met with the Board at its July and September meetings, together with counsel.</p> <p>At its October 2024 meeting, the Board voted 7-0 to find: (i) that the employee in 23067.IG.01 violated §2-156-110(a) twice, for having a prohibited financial interest in City business by virtue of owning a company that was a subcontractor known to the City to be owned by a City employee, and to assess the maximum fine of \$5,000 per violation; (ii) that the employees in .02 and former employer in .03 each violated §2-156-018(a), two times, and to</p>	
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**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>assess the maximum fine of \$5,000 per violation as to the employee in .02 and \$2,500 per violation as to the former employee in .03, for a total of \$15,000; and (iii) to assess a fine of \$1,750 for two violations each of §2-156-018(a), with respect to the employee in .04.</p> <p>At its December 2024 meeting, the Board considered settlement offers from three (3) of the employees, and rejected them by a 5-0 vote, and voted to send the matter to the Law Department to draft charges to enforce the Board’s determination in a confidential administrative hearing pursuant to §2-156-392.</p> <p>The subjects in 23067.IG.01 and .03 entered into agreements to pay their fines in full. The agreement in .01 is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/23067.IG.01%20%20%20%20Christopher%20King.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/23067.IG.01%20%20%20%20Christopher%20King.pdf</a></p> <p>and: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/23067.IG.03%20%20%20%20Christopher%20King.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/23067.IG.03%20%20%20%20Christopher%20King.pdf</a></p>	
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**updated: April 15, 2025**

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			<a href="#">tlementAgreements/23067.03IG%20Steven%20Clay.pdf</a>  The Board referred cases .02 and .04 to the Law Department for confidential administrative hearings to collect the fines assessed: \$10,000 and \$3,500, respectively.  The Law Department declined to file charges in .04. As to Case No. 23067.IG.02, ALJ Frank Lombardo has been assigned to hear the matter.  The total fines assessed by the Board for eight (8) violations came to \$28,500.	
<b>24003.IG</b> <b>[IG docket # C2022-000042912]</b>	Unauthorized use of real or personal City property	N/A	After its investigation, the IG referred this matter to the Board on February 2, 2024, and petitioned the Board for a probable cause finding.  The matter involves an investigation into the deletion of comments from an elected City official’s governmental social media account. The IG’s investigation found that the official improperly used a comment moderation tool that	

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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>resulted in the deletion of comments that did not meet the Board’s prescriptions for the kinds of comments that can be deleted.</p> <p>At its April 2024 meeting, the Board voted 5-0 to seek additional information and clarification, pursuant to §2-156-380(h-1) of the Ordinance. The IG then responded.</p> <p>Then, at the Board’s May 2024 meeting, it voted 4-0 to refer the matter back to the IG for an analysis applying the test set out by the US Supreme Court in its March 15, 2024 decision in <i>Lindke v. Freed</i>, <a href="https://www.supremecourt.gov/opinions/23pdf/22-611_ap6c.pdf">https://www.supremecourt.gov/opinions/23pdf/22-611_ap6c.pdf</a> to the blocked comments to determine whether the blocking is actionable.</p> <p>The IG then presented additional information to the Board. At its September 30 meeting, the Board voted 5-0 to continue the matter for further study until the October meeting.</p>	
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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			After further discussion of the matter at its October meeting, the Board voted 7-0 to continue the matter, pending guidance from federal courts before which litigation on social media blocking by elected officials is proceeding, in light of <i>the Lindke v. Freed</i> decision.	
<b>24004.IG</b> <b>[IG docket # C2022-000043917]</b>  <b>Yat Fan Tam</b>	Offering, receiving, and soliciting of gifts and favors	N/A	<p>After its investigation, the IG referred this matter to the Board on February 27, 2024, and petitioned the Board for a probable cause finding.</p> <p>The matter involves an investigation of a business owner who bribed a City building inspector during a building inspection.</p> <p>At its April 2024 meeting, the Board voted 5-0 to issue a notice of probable cause that the subject violated the Ordinance’s gift prohibitions.</p> <p>The subject did not respond to the Board’s notices or elect to meet with the Board or submit materials to attempt to rebut the Board’s finding. At the Board’s May 2024 meeting, it voted 4-0 to assess the maximum \$5,000 fine</p>	

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**24005.IG**  
**[IG docket # C2022-**  
**000043902]**  
**Bogden Klejka**

## Offering, receiving, and soliciting of gifts and favors

N/A

for the violation. The subject notified the Board that they intend to take the matter to a confidential administrative hearing pursuant to §§2-156-385 and -392. At its June 2024 meeting, the Board voted 4-0 to pursue the fine through a confidential administrative hearing.

The City appointed counsel to represent it. After the Board voted to send the matter to a confidential administrative hearing to enforce its determination, the subject of agreed in December 2024 to pay the fine. The payment agreement is here: <https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/24004.IG%20%20%20%20%20%20%20%20%20%20Yat%20Fan%20Tam.pdf>

After its investigation, the IG referred this matter to the Board on February 27, 2024, and petitioned the Board for a probable cause finding.

The matter involves an investigation of a property owner who bribed a City building

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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>inspector during a building inspection.</p> <p>At its April 2024 meeting, the Board voted 5-0 to issue a notice of probable cause that the subject violated the Ordinance’s gift prohibitions.</p> <p>The subject did not respond to the Board’s notices or elect to meet with the Board or submit materials to attempt to rebut the Board’s finding. At the Board’s May 2024 meeting, it voted 4-0 to assess the maximum \$5,000 fine for the violation. The subject paid the fine in full.</p>	
<b>24013.IG</b> <b>[IG docket # C2022-000044111]</b> <b>O. Patrick Brutus</b>	Unauthorized use of City property	N/A	<p>On June 10, 2024, the IG delivered a completed investigation to the Board. In it, the IG concluded that a City employee who ran for elected City office in 2023 improperly used City property (an official City photograph) for electioneering communications in the campaign.</p> <p>At its July 2024 meeting, the Board voted unanimously to find probable cause that the subject violated §2-156-060 of the Ordinance. At its September</p>	

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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>2024 meeting, the Board voted 5-0 to continue the matter, at the subject’s request. The subject met with the Board at its October 2024 meeting in order to attempt to rebut the Board’s probable cause finding. After that meeting, the Board voted 5-1 (with one abstention) to determine that the employee violated the Ordinance and to assess a \$1,500 fine.</p> <p>At its December 2024 meeting, the Board voted 5-0 to send the matter to the Law Department to draft charges and collect the fine in a confidential administrative hearing pursuant to §2-156-392. However the subject paid the fine in full on December 30, 2024, so the matter was not referred.</p>	
<p><b>24015.IG</b>  <b>[IG docket # C2022-000044002]</b>  <b>Lemuel Austin</b></p>	<p>Action on behalf of relatives or domestic partners</p>	<p>N/A</p>	<p>On June 25, 2024 the IG delivered a completed investigation to the Board, and petitioned the Board for a probable cause finding. After its investigation the IG concluded that a City employee supervised (and thereby “employed”) their relative in the same department in which they both worked, in violation of §2-156-130(a) of the Ordinance.</p>	



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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>At its July 2024 meeting, the Board voted unanimously to find probable cause that the subject violated the Ordinance. The subject presented written materials to the Board.</p> <p>At its September 2024 meeting, the Board voted 5-0 to determine that the subject violated the Ordinance on two occasions, and to impose the maximum fine of \$5,000 per violation, for a total of \$10,000. At its October 2024 meeting, the Board voted 7-0 to vacate the \$5,000 fine for the first violation and to assess the maximum fine of \$2,000 instead, as the violation occurred before September 29, 2019, and thus to assess total fines of \$7,000 for both violations.</p> <p>At its December 2024 meeting, the Board voted 5-0 to enter into a settlement agreement with the subject whereby the subject is paying the maximum \$7,000 fine. The agreement is here: <a href="https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/24015.IG%20Settlement%20Agreement.pdf">https://www.chicago.gov/content/dam/city/depts/ethics/general/SettlementAgreements/24015.IG%20Settlement%20Agreement.pdf</a></p>	
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<b>24016.IG</b> <b>[IG docket # C2022-000044008]</b> <b>Robin Seelhammer</b>	Post-employment restrictions on assistance and representation	N/A	<p>On June 27, 2024, the IG delivered a completed investigation to the Board, and petitioned the Board for a probable cause finding. After its investigation, the IG concluded that a now-former City employee assisted or represented their post-City employer in a matter that arose under a contract with a City department, and that the employee had exercised contract management authority with respect to that contract during City employment, thereby violating §2-156-100(b) of the Ordinance.</p> <p>The subject’s attorneys presented written materials and met with the Board at its September meeting. After that meeting, the Board voted 5-0 to determine that the subject violated the Ordinance’s post-employment provisions and assess a \$2,000 fine. The subject paid the fine in full.</p>	
<b>24018.IG</b> <b>[IG docket # C2023-000000349]</b>	Lobbyists holding elected office	N/A	<p>On August 8, 2024, the IG delivered a completed investigation to the Board, and petitioned the Board for a probable cause finding. After its investigation, the IG concluded that an elected official from a</p>	

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**updated: April 15, 2025**

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			<p>non-City jurisdiction lobbied the City, in violation of the “cross-lobbying” ban, §2-156-309 of the Ordinance.</p> <p>At its September 30 meeting the Board voted 5-0 to refer the matter back to the IG for further investigation and clarification, pursuant to §2-156-380(h-1). The IG responded on November 1.</p> <p>At its January 2025 meeting, the Board voted 4-0 to find probable cause that the subject violated the Ordinance’s lobbying provisions.</p> <p>The subject and their counsel met with the Board at its April 14, 2025 meeting. After that meeting, the Board voted 5-0 to dismiss the case, as the evidence adduced in the IG’s investigation, and its follow-up with the Board, was insufficient to demonstrate a violation.</p>	
<b>24020.IG</b> <b>[IG docket # 000000313]</b>	Statements of Financial Interests		<p>The IG referred this matter to the Board for a probable cause finding on August 27, 2024. After its investigation, the IG concluded that a now-former City employee failed to disclose financial interests in real estate</p>	

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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			<p>located in the City on three (3) Statements of Financial Interests filed in 2019, 2020, and 2021, in violation of the law. At its September 2024 meeting, the Board voted 5-0 to find probable cause. The subject was entitled to meet with and/or present evidence to the Board at its November or December meeting to attempt to rebut that finding. Despite the Board’s repeated attempts to serve the subject with the probable cause finding and advise them of their rights, the subject never responded. Thus, at its December 2024 meeting, the Board, taking the subject’s non-response as an admission, voted 5-0 to find that the subject violated the Ordinance three (3) times and assessed the maximum fine for each violation: \$2,000 for the 2019 violation, and \$5,000 each for the 2020 and 2021 violations, for a total of \$12,000, and to send the matter to the Law Department to draft charges to enforce the Board’s determination in a confidential administrative hearing pursuant to §2-156-392.</p>	
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**updated: April 15, 2025**

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			Settlement discussions are continuing; the Board continued the matter at its April 2025 meeting.	
<b>24021.IG</b> <b>[IG docket # 000043941]</b>	Statements of Financial Interests		<p>On August 27, 2024, the IG deliver a completed investigation to the Board and petitioned the Board for a probable cause finding. After its investigation, the IG concluded that a now-former City appointed official failed to disclose, on Statements of Financial Interests filed for years 2017-2019, that they served on various boards, and failed to disclose certain outside, non-City income received. At its September 30 meeting, the Board voted 5-0 to find probable cause.</p> <p>The subject and their counsel met with the Board at its November meeting to attempt to rebut that finding. After that meeting, the Board, with the entire factual record before it, voted: (i) 6-0 to conclude that the subject committed violations of the Ordinance; and (ii) 4-2 to conclude that the violations were minor, and to send the subject a confidential letter of admonition. Should the subject repeat these types of violations, the violations would not be considered minor.</p>	

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**updated: April 15, 2025**

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<b>24025.IG</b> <b>[IG docket # C2023-0000328]</b>	Unauthorized use of City property		The IG referred this matter to the Board for a probable cause finding on December 2, 2024. After an investigation, the IG concluded that an elected official repeatedly invoked their City title to demand expedited service from a private business and threatened to use their position and authority improperly, all in violation of §2-156-060. At its December 2024 meeting, the Board voted 5-0 to refer the matter back to the IG for further investigation and clarification, pursuant to §2-156-380(h-1). The IG responded on April 7, 2025, and the matter will be on the agenda for a probable cause finding at the Board’s May 2025 meeting.	
<b>24026.IG</b> <b>[IG docket # 2024-000009971]</b>	Unauthorized use of City property		The IG referred this matter to the Board on December 5, 2024, for any action the Board deems appropriate. The IG received a complaint about an elected official’s alleged improper use of an official social media account, but declined to investigate the complaint. At its December 2024 meeting, the Board voted 5-0 to send the official formal notice of the proper and improper uses of an official social media account.	

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<p><b>24027.IG</b>  <b>[IG docket # C2023-000000119]</b></p>	<p>Financial Interest in City contracts; Statements of Financial Interests</p>		<p>The IG referred this matter to the Board for a probable cause finding on December 23, 2024. The IG concluded that the subject, a City employee, had a prohibited financial interest in a City business, in violation of §2-156-110(a) of the Ordinance by virtue of their ownership of a company that entered into a subcontract in December 2020 to provide consulting services to a City contractor on that contractor’s for a City department, which subcontract was worth more than \$10,000 in a calendar year, and was disclosed to the City. The OIG also concluded that the subject failed to disclose their interests in the company on their 2021-2024 Statement of Financial Interests.</p> <p>At its February 2025 meeting, the Board voted 5-0 to find probable cause that the subject committed violations of the Ordinance. The subject and their counsel met with the Board at its April 2025 meeting to attempt to rebut the finding.</p> <p>After that meeting, the Board voted 5-0 to determine that the</p>	
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**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: April 15, 2025**

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			subject committed eight (8) violations of the Ordinance: four each of §§2-156-160, for failing to properly disclose information about the company they owned as required on filed Statements of Financial Interests for four (4) years; and four (4) violations of §§2-156-110(a), for having a prohibited financial interest in a City contract (here a subcontract) through that company, for four (4) years, and assessed total fines of \$69,000. The subject may attempt to negotiate a settlement of these fines.	
<b>25006.IG</b> <b>[IG docket # C2022-000000046]</b>	Post-employment restrictions on assistance and representation		<p>The IG referred this matter to the Board on March 11, 2025, with a request that the Board find probable cause. It involves a former employee who, the IG found, assisted their post-City employer on the very same matters in which the employee participated personally and substantially during their City employment.</p> <p>At its April 14, 2025 meeting, the Board voted 5-0 to find probable cause to conclude that the subject violated the Ordinance one-year revolving door prohibition, §2-156-100(b). The subject is</p>	



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**updated: April 15, 2025**

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			entitled to meet with the Board at its May or June meeting to attempt to rebut that finding.	
<b>25007.IG</b> <b>[IG docket # C2024-000000189]</b>	Statements of Financial Interests		The IG referred this matter to the Board on March 11, 2025, with a request that the Board find probable cause. It involves a former employee who, the IG found, failed to disclose income from their outside employment in excess of \$1,000 on Statements of Financial Interests filed in 2023 and 2024 (covering 2022 and 2023, respectively). At its April 14, 2025 meeting, the Board voted 5-0 to find probable cause. The subject is entitled to meet with the Board at its May or June meeting to attempt to rebut that finding.	

\* The Board was informed of this by the IG, in May 2016.

Updated April 15, 2025