

**Cases Brought to the Board of Ethics**  
**by the Inspector General (“IG”) and former Legislative Inspector General (“LIG”)**  
**updated: January 25, 2022**

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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13009.OLIG [2013OLIG0003]	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.
13010.OLIG [2012OLIG0006]	Fiduciary Duty	Approved March 2013	March 2014: Board dismissed case after LIG found that complaint was not sustained	
13011.OLIG [2012OLIG0014]	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	
13012.OLIG [2013OLIG0013]	Fiduciary Duty/Residency	Approved March 2013	Investigation closed by LIG, September 24, 2015*	
13013.OLIG [2013OLIG0002]	Fiduciary Duty	Approved March 2013	Investigation closed by LIG, September 24, 2015*	
13014.OLIG [2012OLIG0040]	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.
13015.OLIG [2012OLIG0043]	Fiduciary Duty	Approved March 2013	Investigation Still Ongoing	
13030.OLIG [2012OLIG0047]	Fiduciary Duty	Approved June 2013	Investigation Still Ongoing	

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13031.OLIG [2012OLIG0029]	Fiduciary Duty	Approved June 2013	March 2014: Board dismissed case following LIG’s finding that complaint was not sustained	
12039.OLIG/13044.A (OLIG)	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	
13035.OLIG [2012OLIG0006]	Fiduciary Duty	Approved July 2013	Investigation closed by LIG, November 4, 2015*	
13036.OLIG [2013OLIG0009]	Fiduciary Duty	Approved July 2013	May 2015: LIG dismissed the matter without seeking probable cause	
13039.OLIG [2013OLIG0027] Alderman Howard Brookins, Jr.	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.
13040.OLIG [2013OLIG0032]	Personnel Rules	Approved August 2013	Investigation closed by LIG, November 13, 2015*	

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13046.OLIG [2013OLIG0026]	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.
13050.OLIG [2013OLIG0047]	Fiduciary Duty	Approved October 2013	Investigation Still Ongoing	
13057.OLIG [2013OLIG0043]	Campaign Financing	Approved November 2013	Investigation closed by LIG, November 13, 2015*	
14009.OLIG [2014OLIG0014]	City-owned property/Political Activity	Approved March 2014	Investigation Still Ongoing	
14010.OLIG [2014OLIG0013]	Fiduciary Duty/Improper Influence/Conflicts of Interest	Approved March 2014	Investigation closed by LIG, November 13, 2015*	
14027.OLIG [2013OLIG0051 <i>et seq.</i> ]	Fiduciary Duty/Improper Influence/Conflicts of Interest/Contract Inducement/Political Solicitation	Approved July 2014	Investigation closed by LIG, May 8, 2015*	
14028.OLIG [2013OLIG0053]	Aldermanic Expense Allowance/Time Records/Prohibited Political Activities/Political Solicitations	Approved July 2014	Investigation closed by LIG, November 13, 2015*	
14029.OLIG [2014OLIG0046]	Fiduciary Duty/ Time Records/Prohibited Political Activities	Approved July 2014	Investigation closed by LIG, February 20, 2015*	
141272.OLIG [2014OLIG0039]	Fiduciary Duty	Approved November 2014	Investigation Still Ongoing	

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141273.OLIG [2014OLIG0049] (Board had referred signed and sworn complaint to LIG in March 2014)	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		
141274.OLIG [2014OLIG0029]	Fiduciary Duty/Improper Influence/Time Records	Approved November 2014	Investigation closed by LIG, November 4, 2015*	
141275.OLIG [2014OLIG0044]	Fiduciary Duty/Time Records	Approved November 2014	Investigation closed by IG*	
141276.OLIG [2014OLIG0078]	Fiduciary Duty	Approved November 2014	Investigation closed by IG*	
141281.OLIG [2014OLIG0056]	Fiduciary Duty/Political Activity	Approved November 2014	Investigation Still Ongoing	
141282.OLIG [2014OLIG0092]	Political Activity	Approved December 2014	Investigation closed by LIG, November 12, 2015*	
141284.IG [IG docket # 10-0922]	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.
15016.OLIG [2015OLIG0002; 2015OLIG0006]	Aspirational Code of Conduct; Fiduciary Duty; Conflicts of Interests	Approved March 2015	Investigation closed by IG*	
15017.OLIG [2015OLIG0022]	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="#">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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<p><b>Arthur Olvera</b></p> <p><b>18023.IG.2</b></p> <p><b>John McGuire</b></p>	<p>Statements of Financial Interests</p>		<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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<p><b>18039.IG</b>  <b>[IG Docket # 17-0082]</b></p>	<p>Gifts;          Use of City-owned          Property</p>	<p>N/A</p>	<p>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>	<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 “intentional misappropriation 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>

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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>
<p><b>21006.IG</b>  <b>[IG docket # 19-0605]</b>  <b>John LaGiglia</b></p>	<p>Financial Interest in City business</p>			<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>

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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 as 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		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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			<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 on 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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			<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, 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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			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		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, 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.	

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

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